Havering Local Plan – matters following May 2019 hearings

Outstanding actions

1. Please submit all latest Statements of Common Ground (SoCG). Where there are no SoCG please set out the latest position reached with the party.
2. Please submit the latest LDS

Possible Main Modifications required

These are set out without prejudice to my ultimate conclusions in relation to the soundness of the Plan. The Council is aware of the outstanding matters following the May 2019 hearings. No conclusion regarding the soundness of the Plan will be made until that information has been submitted and considered. If that information results in my concluding that the Plan can be made sound subject to modifications, I will write formally to the Council setting out the Main Modifications needed.

In the interim, the Proposed Modifications document should be redrafted in Word using the attached template. The wording in the submitted Plan should be used as a starting point. Proposed deletions should be struck through and proposed insertions underlined as per the attached template.

Looking forward to the consultation, a column will be needed setting out a brief reason for the proposed modification. The Council should therefore insert the reasons for all ‘PM’ modifications which have been identified below. The Inspector will identify the reasons for the ‘EP’ modifications.

Modification numbering should have the prefix MM (not PM or EP) and should start at 1. Modifications and associated changes to the justification should be included as one modification number, to reduce the overall number of modifications.

3. PM12 ‘with suitable brownfield sites being developed first’ to be deleted.
4. A modification is required to set out which Plans / policies in the existing LDF will be superseded by the Havering Local Plan, in accordance with Reg 8(5) of the Town and Country Planning (Local Plans) (England) Regulations 2012.
6. Policy 2 – include PM28; modification needed to explain ‘generous floor to ceiling heights’ as per EP2.
7. Policy 3 – Council to draft modified policy as per further work on Matter 3. Relook at wording of review timing.
8. Policy 4 – alter wording to ‘10 or more’ to comply with London Plan.
12. Policy 11 – Council to draft modified policy as per request for further work.
16. Policy 17 – EP17 and PM78 / PM18 are contradictory. The discussion at the hearing was that criteria vi should be altered to remove ‘on site’ as per EP17. However, the Council appears
to have altered this in PM78 to the effect that this would only relate to the Council’s own sites. I am concerned that this is not justified. The modification should be as per EP17.

17. Policy 19 – include EP19, PM83 & PM84
18. Policy 20 – include PM86.
19. Policy 21 – include EP20 - 27, PM89 – PM100 (all as one modification). Please redraft the policy (with deletions and insertions) for my consideration.
20. Policy 22 – include PM101
21. Policy 23 – include PM103
22. Policy 24 – I am considering what modifications will be required to this policy following the further information and discussion at the May hearing. In order to assist my consideration, please redraft the policy to include the suggested modifications from TfL.
27. Policy 38 – include alteration to the first paragraph as per PM34 in order to ensure consistency with the London Plan
29. PM142
30. EP40 – update figures
31. Modifications to clarify criteria in various policies requiring strategic infrastructure connections / improvements applies to major developments only: (EP1 xvii, xxxii, EP12, EP33). Some of these may already have been identified in the above list.
32. Modifications to increase the flexibility of policies to ensure they are positively prepared (PM41, PM46, PM48, EP13, EP19). Some of these may already have been identified in the above list.

Susan Heywood
INSPECTOR
14.6.19