Dear Ms Heywood

Havering Local Plan Examination – Responses from London Borough of Havering to questions from the Inspector

This letter is to provide you with the Council’s further responses to the matters that you raised in your e-mails of August 5 and August 13, 2019. It follows the comments that the Council set out in its letter of August 21, 2019.

The Council has now also had your letter of August 29, 2019 setting out an outline of the Main Modifications needed to the Havering Local Plan. The Council appreciates that you were able to prepare and provide this to enable it to maintain progress on the Local Plan towards its adoption.

The Council has set out below (and in the enclosures) responses to each of the outstanding matters.

Inspector questions on Proposals Map and Highways England
The Council’s letter response on August 21, 2019 addressed the queries you raised on:

- the Proposals Map (your e-mail of August 13, 2019)
- the Highways England Regulation 19 response (your e-mail of August 13, 2019)

It is noted that an e-mail from the Programme Officer to the Council on August 28, 2019 confirmed that you were satisfied with these responses subject to the Council providing a revised document agreed by Highways England for your further consideration.

The Council is pleased to confirm that the position with Highways England is being resolved to the satisfaction of both parties.

The parties have agreed to the preparation of a revised and updated Memorandum of Understanding to take account of the earlier responses from Highways England and the latest position with regard to the proposed project for improvements at the junction of the
M25 and A12 trunk road. Earlier items have incorrectly referred to this as a Statement of Common Ground and this has been adjusted where necessary.

This is with Highways England’s lawyers and they have indicated they expect to have a response back to LBH by 26th September.

A copy of the revised draft Memorandum of Understanding is enclosed with this letter.

**Draft Main Modifications Schedule (with Inspector comments)**

It was helpful that you were able to provide initial interim comments on the draft Main Modifications Schedule before your holiday.

The Council has addressed all your comments and has indicated under your comments in blue text the changes made.

The document retains for the moment the version of Policy 11 Gypsy and Traveller accommodation that you have made comments on and once the Council has a final version of this policy (see below) it will include it in the Main Modifications document.

We have delayed what were the draft proposed Main Modifications no. 4 and 29 (at your suggestion) but at this stage have not renumbered the subsequent Main Modifications as we are aware that reference has been made to the current numbers in correspondence with yourself and also your letter dated 29th August. We will await your instructions before renumbering.

**Updated Sustainability Appraisal**

Further to your e-mail of 19th August 2019 setting out that the Council should undertake further sustainability appraisal on the draft Main Modifications, our consultants have started this work based on the current draft list of proposed main modifications.

They require the final agreed list before they can complete this task. We will aim to get this to you by 1st October but it will depend on getting an early sign off from yourself of the main modifications proposals accompanying this letter.

This includes the Sustainability Appraisal for the proposed Gypsy and Traveller site allocations.

**Updated Habitat Regulations Assessment**

As per the Sustainability Appraisals.

**Updated Health Impact Assessment**

As per the Sustainability Appraisals.
Policy 11 Gypsy and traveller accommodation
The Council acknowledges the helpful comments in your note of August 14 2019.

The Council has prepared a number of items to evidence how it has addressed your concerns. Details of these are set out below. In summary, these comprise:

- Narrative responses to the twenty five points in your note of August 14 2019
- Draft revised Policy 11 Gypsy and Traveller accommodation (in ‘tracked changes’ and ‘clean’ versions)
- Draft revised Policy 11 Gypsy and Traveller accommodation (suggested re-ordered policy)
- Revised Excel spreadsheet and plans setting out how and where pitches will be accommodated

The Council has prepared a document setting out narrative responses to the twenty-five points / questions you raised in your note of August 14 2019. Subject to your views on the draft revised policy (see below), it may be necessary to adjust some of the responses to the questions.

The Council also attaches a revised copy of Policy 11, which includes the comments in your note of August 14 2019.

For your convenience, the Council has included margin comments to identify where specific matters in your note have been included in the revised policy and explanatory text.

The response document for the Policy includes both a ‘tracked changes’ version of the further revised Policy 11 Gypsy and Traveller accommodation and a ‘clean’ version of this as well.

The Council has reviewed the further revised Policy 11, which addresses your comments in your note of August 14 2019.

The Council would like to suggest that the policy (with these changes and any further that you require) is ‘re-ordered’ so that it has two components and addresses:

- Identifying and addressing accommodation needs
- Development criteria for sites for Gypsy and Traveller and Travelling Showpeople

The suggested re-ordered policy retains all the content in the version with tracked changes and is unaltered in regard to the explanatory text which is common to both versions. In summary, it deals with all the matters linked to the GTAA and planning for sites in the first part and matters linked to development management for sites in the second part.

You will see as well that the suggested re-ordered Policy 11 also enables sub-headings to be inserted for the various 5 year periods of the Local Plan. It is considered that this
greatly helps explain the position that the Local Plan takes on addressing the accommodation needs of Gypsy and Traveller and Travelling Showpeople households.

The Council would be pleased to have your thoughts on this approach, please.

Two items (an Excel spreadsheet and maps) are enclosed to include the further work that the Council has done to show the capacity of sites and where future growth may be accommodated (to respond to specific questions in your August 14 2019 note).

The indicative layout plans previously provided have been amended to clarify the geographic and capacity extent for each of the individual sites and are accompanied by an excel spreadsheet as evidence and presented in the ‘order’ of sites identified in the table in Policy 11 Gypsy and Traveller accommodation.

The boundaries of the sites are shown with a red outline. This red line boundary is the boundary that will be indicated on the Proposals Map subject to the Local Plan being adopted.

The plans also distinguish between the separate periods of need arising for 2016-2021 and 2021-2031 by yellow and blue ‘hatching’. The plans also show the 7 unallocated pitches, including The Grove site 6-15 year need, all of which have been accommodated at the Willow Tree Lodge site.

**Proposals Map booklet changes**

Further changes to address issues arising from the work on Policy 11 Gypsy and Traveller accommodation are included in a revised Proposals Map changes booklet. This is included as an attachment to this letter.

**Local Development Scheme and Site Specific Allocations**

You initially wrote to the Council on August 5 2019. The Council provided a response to that on August 12 2019.

You responded further on August 13 2019 to set out your concern on the Council’s approach and the late stage that this issue has appeared. In particular, you have expressed concerns about sites in the Romford Area Action Plan and the lack of certainty for these moving forward.

The Council has considered this matter carefully in the light of your initial and subsequent comments. It fully recognises and understands the concerns you have raised about Site Allocations in the existing Local Development Framework documents (specifically, the Site Allocations Plan and the Romford Area Action Plan) that have not been implemented and the importance of clarity for these as the Local Plan is adopted.

The Council accepts the importance of its planning documents being able to demonstrate that proper process has been followed with regard to these sites in moving from the Local
Development Framework to the new Local Plan so that there is certainty over these earlier allocations.

As previously indicated, the Council is fully committed to an immediate update of the Local Plan and is already engaged in the preparation of Site Specific Allocations linked to the Local Plan.

The Council has prepared a response document to the matters you raise and this is enclosed.

**Evidence submitted following October 2018 and May 2019 Examination hearings**
The Council responded by e-mail to the Programme Officer on August 23 2019 with a list of the further evidence that it had prepared and submitted following the Examination hearings in October 2018 and May 2019.

The Council’s e-mail noted that this was an initial review with further work undertaken to confirm this.

Enclosed with this letter is a schedule listing all of the further evidence documents submitted since the Examination hearings started in October 2018.

**Havering website**
The Havering Local Plan website is up to date and as previously, this letter and its attachments will be uploaded to the Local Plan pages of the Council’s website.

**Draft Modification Policy 24 Parking**
We note your comment in your letter dated 29th August 2019 that you consider that the plan is unsound in respect of policy 24 and that main modification MM22 is therefore required in order to ensure that the plan is in general compliance with the London Plan and is therefore sound.

Yours sincerely,

S.Lansley

p.p Martyn Thomas

Head of Spatial Planning