Examination into the Havering Local Plan 2016 - 2031

Document from London Borough of Havering to the Inspector

Responses to questions from the Inspector on August 13 2019 about the Local Plan Proposals Map

August 21 2019
Havering Local Plan – responses from Havering to Inspector questions on the Proposals Map

The Inspector has asked in her e-mail of August 13 2019 for clarification about the Local Plan Proposals Map.

This document sets out the Council responses to these matters.

Inspector questions on the Proposals Map

The Inspector has sought clarification on the following points:

The Council has indicated in its draft Proposed Main Modification (reference : MM1) that the Proposals Map in the Havering Local Development Framework will be superseded by the Havering Local Plan.

- Can the Council please advise me how this aligns with the ‘Proposals Map Changes Booklet’, July 2017 ‘. In particular, part 2 of the Changes Booklet sets out the additions, deletions and amendments to the 2008 Proposals Map and states that all other designations on the 2008 Proposals Map remain unchanged. How does the Council's suggested wording of the above proposed modification fit in with this statement?
- How does this change align with the NPPF’s requirement to provide a key diagram and proposals map and with PPG advice?
- How will the extent of land use designations referred to in the policies be determined, eg the extent of the Green Belt, district and local centres, Mineral Safeguarding Areas, to name a few?
- How does this change align with references to the Proposals Map in the submitted Local Plan?

The Council’s response to these questions are set out below. For convenience, the individual questions from the Inspector are set out before the Council’s response:

Overarching comment from the Council

The Council would like to make it clear that it has always been the intention that the preparation of the new Havering Local Plan will be complemented by the preparation of a new Proposals Map in line with the requirements in the National Planning Policy Framework (2012).

It is the Council’s intention that this will be available from the date that the Local Plan is formally adopted.

In regard to the individual matters raised by the Inspector, the Council comments as follows:

- Can the Council please advise me how this aligns with the ‘Proposals Map Changes Booklet’, July 2017 ‘. In particular, part 2 of the Changes Booklet sets out the additions, deletions and amendments to the 2008 Proposals Map and states that all other designations on the 2008 Proposals Map remain unchanged. How does the Council's suggested wording of the above proposed modification fit in with this statement?
Council response:

Section 2 of the Changes Map 2017 booklet (and subsequent 2018 addendum) clearly identifies proposed additions, deletions and amendments to the existing Local Development Framework 2008 Proposals Map.

Paragraph 1.4 of the 2017 booklet says that a full version of the Proposals Map incorporating any changes identified in the booklet will be produced on adoption of the Local Plan.

The Council considers that the Proposed Main Modification which says that the Proposals Map will be superseded is consistent with this commitment.

Notwithstanding that, the Council suggest that it will assist if and clarify if the Proposed Main Modification is expanded by the addition of new text (shown in bold here) in the bullet point for the Proposals Map as follows:

Proposals Map (2008) will be superseded by a new Proposals Map for the Local Plan and this will include the changes identified in the Proposals Map Changes booklet(s) submitted for Examination and those elements of the existing Proposals Map which will be unchanged.

- How does this change align with the NPPF’s requirement to provide a key diagram and proposals map and with PPG advice?

Council response:

As identified above, throughout the preparation of the new Havering Local Plan, the Council’s intention has always been to prepare a new Proposals Map to accompany the Local Plan when it is adopted.

This is in line with paragraph 157 of the National Planning Policy Framework (2012) which says that broad locations for development should be indicated on a key diagram and land-use designations identified on a policies map (Council’s emphasis).

The Submission Local Plan includes a Key Diagram as Figure 2 in Section 5 Borough-wide Strategy for growth. Additionally, Policies 1 and 2 for the Romford and Rainham and Beam Park Strategic Development Areas, respectively, both include supporting diagrams to indicate key features to inform understanding of these policies. It is intended that each of these diagrams will be included in the adopted Local Plan.

- How will the extent of land use designations referred to in the policies be determined, eg the extent of the Green Belt, district and local centres, Mineral Safeguarding Areas, to name a few?

Council response:

The new Proposals Map will reflect the commentary in the Proposals Map Changes booklet(s).

Thus it will include the changes identified in the text in the booklets and retain as unchanged all other designations on the 2008 LDF Proposals Map as is set out in the pre-amble text to Section 2 of the 2017 document. For example, the Local Plan does
not bring forward any changes to the Green Belt boundary other than the ‘insetting’ of sites for Gypsies and Travellers and the substantive boundary of the Green Belt will remain as it was designated in the Local Development Framework in 2008.

- How does this change align with references to the Proposals Map in the submitted Local Plan?

Council response:

The references in the submitted Local Plan to the Proposals Map are set out in paragraph 1.1.3 of the Local Plan.

The text in paragraph 1.1.3 of the submission Local Plan explains that the Local Plan and the Proposals Map together with the London Plan, the Joint Waste Development Plan Document for the East London Waste Authority Boroughs and Havering’s forthcoming Site Specific Allocations Local Plan will comprise the Development plan for the borough and will be the primary basis against which planning applications are assessed.

The Council considers that its intention to prepare a new Proposals Map to accompany the Local Plan (when adopted) is consistent with this and there will be clarity on how the Local Plan and the Proposals Map inform, support and complement each other.

Martyn Thomas
August 21 2019