Dear Sir/Madam

Havering Local Plan: Consultation on Proposed Main Modifications Monday 17th August to Monday 12th October 2020

The Havering Local Plan is undergoing an independent public examination following its submission to the Government in March 2018.

Examination hearings took place in October 2018 and May 2019 under the direction of a Planning Inspector (Ms Susan Heywood BSc (Hons) MCD MRTPI).

The Council and the Inspector are now undertaking further work aimed at the Council formally adopting the Local Plan in 2020.

Why this letter has been sent to you

This letter is to tell you that you have an opportunity to comment on some specific parts of the Local Plan. These comprise:

- proposed Main Modifications to the Local Plan;
- proposed changes to the Proposals Map;
- revisions and updates to the evidence base supporting the Local Plan; and
- Statement from the Council on changes to the Use Classes.

The proposed Main Modifications to the Local Plan

The Inspector considers that the Local Plan could be found ‘sound’ subject to it including a number of Main Modifications. These are identified in a schedule (see below).

The proposed Main Modifications are put forward without prejudice to the Inspector’s final conclusions regarding the soundness of the Plan. All representations made on the proposed Main Modifications during this consultation period will be taken into account by the Inspector before she reaches final conclusions on the Main Modifications required to the Plan.
You can also view a tracked changes version illustrating how the proposed modifications to the Local Plan would be incorporated into the Local Plan. This can be found at:

https://www.havering.gov.uk/info/20034/planning/183/planning_policy/12

Revisions and updates to the Proposals Map

The Inspector is inviting comments on a document prepared to support the proposed modifications to Policy 11 Gypsy and Traveller Accommodation.

The document entitled ‘Gypsy and Traveller Accommodation & Proposals Map Changes January 2020’ replaces earlier addendums to the Proposals Map Changes booklet in March 2019 and September 2019. The document details additional sites that have been included in Policy 11 and site boundary changes to specified other sites.

Revisions and updates to the Local Plan evidence base

The Inspector is also inviting comments on some specific parts of the evidence base material informing the preparation of the Local Plan. This is because some of this has been revised and updated since the Local Plan was submitted.

This latest work also takes account of comments made during the earlier consultation(s) and at the Examination hearings.

Most of the changes to the evidence base are focussed on the Council’s commitment to satisfying the Inspector about ensuring:

- the supply of new housing over the Plan Period; and
- how the Local Plan caters for the Gypsy and Traveller community in Havering over the Plan Period

The changes to the evidence base also address the need for some adjustments to be made in regard to the data on housing completions set out in the housing trajectory.

Statement from the Council on changes to the Use Classes


The amendments to the Use Classes relate to town centre uses will mean that some parts of the following policies can no longer be implemented.

- Policy 13 Town centre development
- Policy 14 Eating and drinking
- Policy 17 Education
- Policy 19 Business growth

Addressing these changes at this late stage in the Examination process would delay the consultation on the Main Modifications and subsequent adoption of the Local Plan. The Council intends to address the changes to the Use Classes through an immediate update of the Local Plan.

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Parts of the Local Plan which have not changed

This consultation only deals with the proposed Main Modifications, changes to the Proposals Map and the updates to the evidence base as set out above.

The rest of the Local Plan is no longer open for comment and any comments not related to the proposed Main Modifications, Proposals Map changes or updated evidence base will not be taken into account.

If you have already submitted comments on the Local Plan then there is no need to repeat these or re-submit them as they have already been considered as part of the examination process.

What you may comment on

Comments are invited on:

- The proposed Main Modifications;
- Changes to the Proposals Map;
- Revisions and updates to the evidence base; and
- Statement from the Council on changes to the Use Classes

Comments on the proposed Main Modifications should focus on whether you think the proposed Main Modifications are necessary to make the Local Plan ‘sound’ (including legally compliant) as required by paragraph 20 of the Planning and Compulsory Purchase Act 2004.

The National Planning Policy Framework (2012) explains that to be ‘sound’, Local Plans have to be positively prepared, justified, effective and consistent with national policy (paragraph 182).

For information, it was agreed at the initial Local Plan Examination hearings in October 2018 that the Local Plan would be considered under the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (2019).

Comments on other aspects of the submission version of the Local Plan will not be taken into account and will be disregarded.

The documents which are included in the consultation

At the request of the Inspector, the following documents form part of this consultation:

- MMC01 Schedule of Proposed Main Modifications (August 2020)
- MMC02 Proposals Map Changes Booklet Addendum (in light of the Main Modifications) (December 2019)
- MMC03 Habitat Regulations Assessment: Havering Local Plan Main Modifications (April 2020)*
- MMC05 Sustainability Appraisal (SA) for the Havering Local Plan: SA Report Addendum to accompany the Main Modifications (April 2020)*
MMC06 Review of 2018 Review of Specialist Older Persons’ Housing (this also forms Appendix 11 of the Housing Position Statement)
MMC07 Housing Position Statement 2019 - Technical Update May - (October 2019 amendment) including:
  • MMC08 Update to Annex 8 of the Housing Position Statement
  • MMC09.01- MMC09.04 Updates to Annexes 14.1, 14.2, 14.3 and 14.4 of the Housing Position Statement 2019 – Technical Update May (October amendment) (comprising housing completions in Financial Years 2014 – 2017 (inclusive))
  • MMC10 Housing Trajectory October 2019 Update for Inspector
MMC11 Revised Gypsy and Traveller Accommodation Assessment Update report (July 2019)
MMC12 Site Layouts Drawings (Supporting site layout material for revised Policy 11 Gypsy and Traveller Accommodation) (09-07-2019)
MMC13 Pitch Deliverability Assessments (Matrices) (February 2019)
MMC14 Gypsy and Traveller Accommodation and Proposals Map Changes (January 2020)
MMC15 Supplementary retail note for the Havering Local Plan (December 2018)
MMC16 Statement from the Council on changes to the Use Classes (August 2020)

*The Council has reviewed these documents in light of other proposed amendments and considers no other changes are necessary).

It should be noted that:

  • Annexes numbers 1-7 and 9-13 of the Housing Position Statement 2019 Technical Update May 2019 (October 2019 amendment) remain unchanged from those submitted at the May 2019 hearing sessions
  • The pitch assessments set out in the Pitch Deliverability Assessment Matrices (February 2019) for each site are superseded by the latest Gypsy and Traveller Accommodation Assessment Update report (July 2019). The supporting information in the Pitch Deliverability Assessments remains appropriate.

Consultation Arrangements

The Government has emphasised the importance of plan-making continuing during the Covid19 pandemic. In accordance with Government guidance the Council has made temporary changes to its adopted Statement of Community Involvement to set out how the Council will ensure that the public consultation is meaningful, open and accessible to all stakeholders including residents in Havering.

During the consultation period it will not be possible to view hard copies of the documents at the Council offices or in libraries. Further details on how the documents can be viewed are set out below.

Where copies of the documents can be viewed?

Copies of the documents can be viewed online at: https://www.havering.gov.uk/info/20034/planning/183/planning_policy/12

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Who can comment during the consultation?

This consultation is open to everyone and is not restricted to those people or organisations that made representations during previous stages of the plan.

In accordance with the statutory requirements, the consultation will run from Monday 17th August until Monday 12th October 2020. Unfortunately late comments cannot be accepted.

How to respond to the consultation

If you wish to make comments, please use one of the following methods:

- **Online**: using the consultation response form at https://havering.objective.co.uk/portal/

- **By email**: please complete the consultation response form (available at the link above) and send it to DevelopmentPlanning@havering.gov.uk

- **By post**: please complete the consultation response form and send it to: London Borough of Havering, Development Planning, 5th Floor Mercury House, Mercury Gardens, Romford, RM1 3SL

Please quote the relevant Main Modification reference number including, policy or paragraph to which your response relates.

You can download further guidance on how to make comments at the link above.

What will happen to your comments

Your comments and name will be published and made available to the Planning Inspector following the consultation. However, personal information, such as addresses, phone numbers and emails, will be kept confidential.

Your comments will be forwarded to the Inspector who will take all representations on the proposed Main Modifications into account before determining whether any Main Modification is necessary to make the submitted Local Plan sound.

Further information on the Local Plan

The Council is proposing a number of additional ‘minor’ modifications (e.g. typographical errors, clarifications and factual updates) to improve the clarity of the Local Plan. None of these changes will materially affect the policies of the Local Plan and they are outside the scope of this consultation. Comments on these additional modifications will not be forwarded to, or considered by, the Inspector.

Details can be found at:

**Cleaner, Safer, Prouder Together**
Other relevant documents relating to the examination of the Local Plan can also be found at the above link.

If you have any queries please contact: developmentplanning@havering.gov.uk

Next steps

Having considered all responses to the proposed Main Modifications, the Inspector will finalise her report into the soundness of the Local Plan and the schedule of recommended Main Modifications. The Inspector’s report is expected later this year.

If the Inspector finds the Local Plan ‘sound’ and legally compliant, the Council expects to formally adopt the Local Plan in 2020.

Yours faithfully,

The Development Planning Team
London Borough of Havering