

Sustainability Appraisal (SA) for the Havering Local Plan

SA Report Further Addendum to accompany
Further Main Modifications to the Local Plan

The London Borough of Havering

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Quality information

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Non-Technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Havering Local Plan 2016-2031 on behalf of the London Borough of Havering. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Local Plan is a legal requirement.

The London Borough of Havering is currently preparing a new Local Plan to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which will cover the period to 2031, will be the key planning policy document for the borough and will guide decisions on the use and development of land. Replacing the Havering Local Development Framework, the Local Plan together with the London Plan will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.

The Local Plan is at an advanced stage of preparation, having been formally published in August 2017 ahead of being submitted to the Planning Inspectorate for examination in March 2018; and then having been the focus of examination hearings in October 2018 and May 2019. As a result of discussion at the hearing sessions and representations received during examination a number of changes or 'Main Modifications' were proposed to the Local Plan and published in August 2020.

Subsequent to the publication of the Main Modifications, the Inspector has requested a number of further modifications to be made to the Local Plan to ensure it remains in general conformity with the London Plan, specifically the London Plan 2021 recently adopted in March 2021.

These changes are referred to as Further Main Modifications and need to be considered through the SA process to determine if they significantly affect the findings of the previous SA work.

This is a Non-Technical Summary (NTS) of the SA Report Further Addendum, which is an additional addendum to the SA Report [Exam ref: LBHLP.8] published alongside the Proposed Submission Plan and the SA Report Addendum published alongside the Main Modifications in August 2020.

The aim of the SA Report Further Addendum is essentially to present information on the latest proposed modifications, with a view to informing the current consultation and subsequent plan finalisation.

Appraising the Further Main Modifications

The Council is proposing a number of Further Main Modifications to the submitted Local Plan as a result of the Inspector's response to the adoption of the London Plan 2021 in March 2021. It is necessary to screen the Further Main Modifications to determine if they significantly affect the findings presented in the Proposed Submission version of the SA Report [Exam ref: LBHLP.8] and the subsequent Main Modifications SA Report Addendum (published August 2020), and if further appraisal work is therefore required. Minor Modifications mainly relate to minor edits to the Plan text and have therefore been screened out as not being significant in terms of the SA, i.e. they would be inherently unlikely to give rise to significant effects.

The screening of the proposed Further Main Modifications concluded that the majority do not significantly affect the findings of the Proposed Submission SA Report (2017) [Exam ref: LBHLP.8] and subsequent SA Report Addendum (August 2020). The changes seek to provide further clarity and do not fundamentally alter the direction of the policies.

The screening identified one Further Main Modification (FMM22, replacing MM22) as needing to be carried forward for further consideration through the SA process. This is given substantive changes to Local Plan Policy 24 (Parking Provision and Design).

The appraisal of this Further Main Modification found that it is unlikely to have a significant effect alone or significantly affect the findings presented in Chapter 8 of the Proposed Submission SA Report (2017) or those presented in the SA Report Addendum accompanying the Main Modifications (August 2020).

Next Steps

Following the current consultation, the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings.

Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

1. Introduction

Background

- 1.1 The London Borough of Havering is currently preparing a new Local Plan (Havering Local Plan 2016-2031) to replace the existing planning policies in the Havering Local Development Framework. The new Local Plan, which will cover the period to 2031, will be the key planning policy document for the borough and will guide decisions on the use and development of land. Replacing the Havering Local Development Framework, the Local Plan together with the London Plan 2021 will comprise the Development Plan for the borough and will be the primary basis against which planning applications are assessed.
- 1.2 The Local Plan is at an advanced stage of preparation, having been formally published in August 2017 ahead of being submitted to the Planning Inspectorate for examination in March 2018; and then having been the focus of examination hearings in October 2018 and May 2019. As a result of discussion at the hearing sessions and representations received during examination a number of changes or 'Main Modifications' were proposed to the Local Plan and published in August 2020.
- 1.3 Subsequent to the publication of the Main Modifications, the Inspector has requested a number of further modifications to be made to the Local Plan to ensure it remains in general conformity with the London Plan, specifically the London Plan 2021 recently adopted in March 2021.
- 1.4 These changes are referred to as Further Main Modifications and need to be considered through the SA process to determine if they significantly affect the findings of the previous SA work.

Sustainability Appraisal

- 1.5 AECOM is commissioned to undertake an independent Sustainability Appraisal (SA) in support of the London Borough of Havering Local Plan. SA is a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.

Purpose and structure of this SA Report Further Addendum

- 1.6 The aim of this SA Report Further Addendum is essentially to present information on the proposed Further Main Modifications, with a view to informing the current consultation and subsequent plan finalisation.
- 1.7 This report is known as an 'SA Report Further Addendum' on the basis that it is an addendum to the SA Report published in August 2017 [Exam ref: LBHLP.8] and the SA Report Addendum published in August 2020. This SA Report Further Addendum is structured as follows:
 - **Chapter 2** - presents the scope of the SA;
 - **Chapter 3** - explains the method and presents the findings of the screening of proposed modifications;
 - **Chapter 4** - explains the method and presents the findings of the appraisal for proposed modifications that were 'screened in'; and
 - **Chapter 5** - sets out the next steps in plan-making and the SA process as well as any changes to previously proposed monitoring measures.

2. What's the scope of the SA?

2.1 The scope of SA work, with respect to the Havering Local Plan 2016-2031, is introduced within the Proposed Submission version of the SA Report published in August 2017. Essentially, the scope is reflected in a list of sustainability objectives, which collectively provide a methodological 'framework' for appraisal. The SA objectives are listed below in **Table 2.1**. It has not been necessary to update the SA framework for the purposes of this appraisal.

Table 2.1: The SA framework

SA theme	SA objectives
Biodiversity	Maintain and enhance biodiversity and geodiversity.
Climate Change	Reduce contributions to climate change and enhance the capability of the borough to adapt to climate change while promoting systems efficiency (water, energy, recycling, sustainable drainage systems, green infrastructure) and local renewable energy production.
	Avoid, reduce and manage all forms of flood risk, and encourage the use of SuDS.
Land, Soil and Water Resources	Minimise the production of waste and maximise the reuse, recycling and landfill diversion of waste.
	Ensure appropriate levels of aggregate extraction, whilst minimising adverse environment impacts.
	Protect water resources, while contributing to the objectives of water management plans.
Environmental Quality	Manage air quality, noise, land, water and light pollution throughout the borough.
	Reduce the adverse effect of traffic on the environment.
	Support land remediation that can improve the ecology of the area and mitigate flood risk.
Historic Environment, Landscape and Townscape	Conserve and enhance the historic environment, heritage assets and their settings where appropriate.
	Conserve and enhance cultural assets.
	Create, protect and enhance places, spaces and buildings that are of high quality, well designed and respect the character of the local area.
Population and Community	Provide the opportunity for all residents to live in an affordable, decent home.
	Improve accessibility to essential services, facilities and the workplace.
	Reduce poverty, inequality and social exclusion.
	Reduce crime, the fear of crime and increase community safety.
	Foster community identity and participation.
Health and wellbeing	Improve the health and wellbeing of the population.
Transportation	Reduce the need to travel particularly via environmentally harmful means by ensuring facilities and services are in sustainable locations and supporting flexible working conditions.
Economic Vitality, Employment and Skills	Improve opportunities for economic growth.
	Facilitate indigenous, inward and regional investment.
	Offer all residents the opportunity for rewarding, well-located and satisfying employment.
	Improve life-long learning, skills and education.

3. Screening of the Further Main Modifications

Introduction

3.1 The Council is proposing a number of Further Main Modifications to the submitted Local Plan as a result of the Inspector's response to the adoption of the London Plan 2021 in March. It is necessary to screen the Further Main Modifications to determine if they significantly affect the findings presented in the Proposed Submission version of the SA Report [Exam ref: LBHLP.8] and the subsequent Main Modifications SA Report Addendum (published August 2020), and if further appraisal work is therefore required.

Method

3.2 All of the proposed Further Main Modifications were screened to determine if further SA work was required or they could be screened out from appraisal. The findings of the screening including the rationale for why a Main Modification was screened in or out are provided in **Table 3.1**.

Screening findings

3.3 **Table 3.1** below summarises the Further Main Modifications proposed and indicates which ones have been screened in or out for the purposes of SA. It also presents an overview of the rationale for the decision taken.

Table 3.1 Screening the Further Main Modifications for the purposes of SA

Further Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
FMM1	Insertion of new paragraphs between existing paragraphs 1.1.5 and 1.1.6 setting out how a new Local Plan will be progressed in conjunction with the context of the new London Plan 2021 and revisions to the NPPF in 2019.	No	Modification provides additional context in relation to the next Local Plan and does not significantly affect the findings of the previous SA work.
FMM2, FMM3, FMM6 (replacing MM6) and FMM29 (replacing MM29)	Changes to: Policy 3 - Housing Supply; Objectives Paragraph 3.2.1; Paragraph 5.1, Spatial Strategy; and Table 10, Local Plan Monitoring Framework to reflect updated evidence, explain the application of a 'stepped' approach and ensure consistency with national planning policy and the London Plan 2021. In this respect the housing target has been increased over the Local Plan period from a minimum of 17,550 to a minimum of 18,930 dwellings.	No	The housing numbers have been reconfigured to reflect evidence and provide further clarity; however, the overall spatial distribution development has not changed during the plan period. In addition, the supply situation over the first 10 years of the Plan period is likely to meet and exceed the London Plan 2021 target. As a result, it is considered that the modification does not significantly affect the findings of the previous SA work.

Further Main Modification	Focus (changes in relation to...)	Screened in?	Rationale
FMM7 (replacing MM7)	Policy 4 - Affordable Housing Provides additional clarification on affordable housing provision on public sector land or on industrial sites where the scheme would result in a net loss of industrial capacity. This is with a view to aligning with the London Plan provisions for 50% affordable housing on this type of land, including, specifically, relating to the provision of viability information for development delivered without public subsidy.	No	Modification provides additional clarification, including on the provision of viability information, and does not significantly affect the findings of the previous SA work.
FMM22 (replacing MM22)	Policy 24 - Parking Provision and Design A number of changes are made to Policy 24 to help align the minimum parking standards with those taken forward through the London Plan 2021.	Yes	Given the differences between the previous and proposed standards, these are substantive updates to the policy which should be appraised.

3.4 The Further Main Modification identified in the table above as being screened in is carried forward for further consideration through the SA process in the following chapter.

4. Appraisal of the Further Main Modifications

Introduction

- 4.1 This chapter presents an appraisal of the 'screened in' proposed modification (see Table 3.1). Also, consideration is given to the in-combination effects of the submitted plan, main modifications plus the proposed further modification.

Methodology

- 4.2 The appraisal identifies and evaluates 'likely significant effects' of the proposed further modification on the baseline, drawing on the SA themes/objectives identified through scoping (see Table 2.1) as a methodological framework. To reiterate, the SA themes are as follows:
- Biodiversity
 - Climate change
 - Land, soil and water resources
 - Environmental quality
 - Historic environment, landscape and townscape
 - Population and community
 - Health and wellbeing
 - Transportation
 - Economic vitality, employment and skills
- 4.3 The focus of the appraisal is on the proposed Further Main Modifications (given that it is these proposed modifications that are currently the focus of consultation); however, explicit consideration is also given to the effects of the Havering Local Plan as modified (i.e. the cumulative effects of the proposed modifications and the rest of the Local Plan as submitted).
- 4.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to the nature of plan implementation and aspects of the baseline that might be impacted.
- 4.5 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on effects in more general terms.
- 4.6 It is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as appropriate. Cumulative effects are also considered, i.e. effects that become apparent once the effects of the Local Plan are considered in a wider context (i.e. recognising that it will not be implemented 'in a vacuum').

Appraisal of the Further Main Modifications

4.7 The following section presents an appraisal of the Further Main Modification which has been screened in (Table 3.1) as requiring closer examination through the SA process.

Further Main Modification FMM22

4.8 This modification updates parking standards in areas with low public transport access. Specifically, it addresses parking standards in areas with Public Transport Access Level (PTAL) 0-1.

4.9 The changes are as follows for the areas of the borough that are within PTAL 0-1 but outside of Opportunity Areas: for one bedroom units the specification has changed from less than 1 parking space per unit to 0.5 parking space per unit; for 2 bedroom units there is a change from less than 1 parking space per unit to 1 parking space per unit; and for 3 bedrooms (previously up to 1.5 spaces per unit) and 4 bedrooms (previously up to 2 spaces per unit) a change of specification to 1.5 spaces per unit is proposed.

4.10 The minimum standards previously set out for areas within PTAL 0-1 outside of Opportunity Areas also applied for areas of the borough within PTAL 2 but 800m+ away from existing or planned rail and underground stations, with the London Plan standards applied for other areas within PTAL 2. These additional standards have been removed by FMM22 to achieve consistency with the standards set out in the London Plan 2021. The revised standards translate as up to 0.75 spaces per dwelling for 1-2 bedroom units (which is broadly similar to before when these sized dwellings are considered together) and up to 1 space per dwelling for 3+ bedroom units (which is a decrease from up to 1.5 spaces per dwelling).

4.11 The appraisal of FMM22 is presented below in Table 4.1.

Table 4.1: Appraisal of FMM22

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan or Main Modifications?
Biodiversity	The modification does not change the level or distribution of growth in the borough during the plan period. These changes are also unlikely to lead to significant increases or decreases in overall landtake requirements from residential parking. As a result it is not likely to have a significant effect alone on biodiversity.	This modification does not significantly affect the findings of the SA for biodiversity, set out in Section 8.3 or the conclusions presented in Table 8.1 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan or Main Modifications?
Climate change	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. The revised parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations translate into 0.75 spaces per dwelling for 1-2 bedroom units and up to 1 space per dwelling for 3+ bedroom units. The reduction of parking standards for larger dwellings (from up to 1.5 in those areas within PTAL 2 800m or more from existing or planned rail and underground stations) may slightly increase the use of lower carbon modes of transport for those living in these properties. On balance though, these changes are unlikely to lead to significant effects on overall greenhouse gas emissions from car use in the borough.</p> <p>These changes are also unlikely to lead to significant increases or decreases in overall landtake requirements from residential parking in these locations, or associated effects on surface water run off or flood risk.</p>	<p>This modification does not significantly affect the findings of the SA for the climate change SA theme, set out in Section 8.4 or the conclusions presented in Table 8.2 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>
Land, soil and water resources	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. On balance, these changes are unlikely to lead to significant increases or decreases in overall landtake requirements from residential parking in these areas. This also applies in relation to landtake from updated parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations.</p>	<p>The modification does not significantly affect the findings of the SA for land, soil and water resources, set out in Section 8.5 or the conclusions presented in Table 8.3 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>
Environmental quality	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. On balance, these changes are unlikely to lead to significant effects on air or noise quality in the borough. In addition, these changes are also unlikely to lead to significant increases or decreases in overall landtake requirements from residential parking in these locations, or associated effects on surface water quality. This also applies in relation to landtake and air and noise quality from revised parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations.</p>	<p>This modification does not significantly affect the findings of the SA for environmental quality, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan or Main Modifications?
Historic environment, landscape and townscape	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. On balance, these changes are unlikely to lead to significant increases or decreases in overall landtake requirements from residential parking in these areas, or associated effects on the fabric and setting of the historic environment and on townscape and landscape character. This also applies in relation to the revised parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations.</p>	<p>The modification does not significantly affect the findings of the SA for historic environment, landscape and townscape, set out in Section 8.7 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020). This is given the existing historic environment and townscape/landscape policies of the Local Plan will continue to apply in association with the design of new development in the borough.</p>
Population and community	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. On balance, these changes are unlikely to lead to overall significant effects on factors such as accessibility to services and facilities, social inclusion, community cohesion or the other elements considered under this SA theme.</p> <p>The revised parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations translate into 0.75 spaces per dwelling for 1-2 bedroom units (which is broadly similar to before when these sized dwellings are considered together) and up to 1 space per dwelling for 3+ bedroom units (which is a decrease from up to 1.5 spaces per dwelling). Whilst this reduces parking provision for larger dwellings in these areas, it is considered that it is offset by their higher PTAL rating, which balances the overall transport accessibility of these types of dwellings.</p>	<p>This modification does not significantly affect the findings of the SA for population and community, set out in Section 8.8 or the conclusions presented in Table 8.5 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>
Health and wellbeing	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. The reduction of parking standards for larger dwellings in those areas within PTAL 2 800m or more from existing or planned rail and underground stations may slightly increase the use of active travel modes for those living in these properties. On balance though, these changes are unlikely to lead to overall significant effects on active travel, green infrastructure provision or the other elements considered under this SA theme.</p>	<p>This modification does not significantly affect the findings of the SA for health and wellbeing, set out in Section 8.9 or the conclusions presented in Table 8.6 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>

SA theme	Is the modification alone likely to have a significant effect?	Does the modification affect the conclusion of the SA for the Proposed Submission Plan or Main Modifications?
Transportation	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties.</p> <p>The revised parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations translate into 0.75 spaces per dwelling for 1-2 bedroom units (which is broadly similar to before when these sized dwellings are considered together) and up to 1 space per dwelling for 3+ bedroom units (which is a decrease from up to 1.5 spaces per dwelling). Whilst this reduces parking provision for larger dwellings in these areas, it is considered that it is offset by their higher PTAL rating, which balances the overall transport accessibility of these types of dwellings.</p> <p>On balance, these changes on their own are unlikely to lead to overall significant effects on accessibility to services and facilities, walking and cycling levels or public transport use.</p>	<p>The modification does not significantly affect the findings of the SA for transportation, set out in Section 8.10 or the conclusions presented in Table 8.7 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>
Economic vitality, employment and skills	<p>The modification has the potential to slightly decrease the provision of parking for properties in areas with PTAL 0-1 outside of Opportunity Areas with 1 bedroom, slightly increase provision for properties with 2 and 3 bedrooms, whilst slightly decreasing parking provision for 4 bedroom properties. On balance, these changes on their own are unlikely to lead to significant effects on economic vitality or access to employment opportunities. This also applies in relation to the updated parking standards for those areas within PTAL 2 800m or more from existing or planned rail and underground stations.</p>	<p>The modification does not significantly affect the findings of the SA for economic vitality, employment and skills, set out in Section 8.6 or the conclusions presented in Table 8.4 of the Proposed Submission SA Report (2017) or the SA Report Addendum (August 2020).</p>

4.12 In summary, Further Main Modification FMM22 is not likely to have a significant effect alone nor does it significantly affect the findings or conclusions presented in the SAs for the Proposed Submission Plan and subsequent Main Modifications.

5. Next steps

Plan finalisation

- 5.1 Following the current consultation, the Inspector will consider all representations received, before deciding whether to report on the Plan's soundness (with modifications as necessary), or resume examination hearings.
- 5.2 Assuming that the Inspector is ultimately able to find the Plan 'sound', it will then be adopted by the Council. At the time of adoption an 'SA Statement' will be published that explains the process of plan-making/SA in full and presents 'measures decided concerning monitoring'.

Monitoring

- 5.3 The SA Report [Exam ref: LBHLP.8] published alongside the Proposed Submission document sets out a range of 'proposed monitoring measures' in Chapter 9. The work carried out in relation to the proposed modifications does not necessitate any significant amendments to the proposed measures at this stage. A final list of monitoring measures will be presented within the SA Adoption Statement produced once the Local Plan is adopted.

