

Actions from Havering Local Plan Examination in Public and Modifications to be prepared- as at 22/3/19

The table below sets out actions to be completed at the request of the Inspector and further proposed Modifications agreed to be prepared following discussion at the Examination. The latter are **bold**.

Action	Status
Matter 1 : Legal compliance and Duty to Co-operate	
Position statement with progress on Statements of Common Ground (SoCGs)	<p>All SoCGs have been sent out to the relevant authorities for signatures. We have received signed SoCGs from the following authorities:</p> <p>We have received the following signed SoCG:</p> <ul style="list-style-type: none"> • Brentwood • Redbridge • Brentwood • Epping Forest • Thurrock • Basildon • Bexley • Chelmsford • Essex • Newham • Rochford • Environment Agency • Natural England • The GLA • Barking and Dagenham • <p>We are still awaiting the signed SoCG from:</p>

	<ul style="list-style-type: none"> • Waltham Forest • Highways England <p>Signed SoCGs will be provided when all are available</p>
Sustainability Appraisal – Evidence to support reaching Option 1 (demonstrate ‘transparency’). (This was also raised in regard to Matter 3.)	Response contained in the Sustainability Appraisal for Havering Local Plan SA Report Addendum December 2018
<p>The SA should clearly and fully explain why all alternatives have been rejected, including options 2 and 3, which do not require the release of GB land. The SA (page 32) says that options 2, 3 and 5 would 'overburden existing facilities and put pressure on existing infrastructure'.</p> <p>What evidence has the Council used to reach this conclusion?</p>	Response contained in the Sustainability Appraisal for Havering Local Plan SA Report Addendum December 2018
Habitat Regulations Assessment – how have actions identified as Red/ Amber on table page 22 onwards been translated into changes in the Local Plan	Response contained in the Further response from London Borough of Havering to Inspector document
Review modifications that were not discussed at Session 1 especially PM 12.	To be dealt with at the Examination in 2019
Matter 2 : Spatial Strategy	
Map of Twelve Estates programme and provide indication of how the numbers have changed with the approvals	Given to inspector at examination.

/updated delivery figures	
Clarify references to 3,000 / 3,250 new homes in Local Plan Policy 2 and Rainham and Beam Park Framework and advise correct figure	Response contained in the Further response from London Borough of Havering to Inspector document
Additional units approved for Beam Park (GLA) and how this impacts on housing numbers	Included on housing trajectory
Check criteria numbers in Policy 1	Checked and updated and included on Modifications list
Modification Policy 1 active travel links to be secured only in <i>major</i> schemes (xviii), River Rom improvements to be secured only in <i>major</i> schemes (xx), explain 'generous' floor height requirements, expand on tall buildings being addressed in Romford Masterplan and expand references to Romford Masterplan generally	Included on Modifications list
Matter 3 : Housing	
Full update of all the sites included on the trajectory (small and large sites) to include up to date information on all sites addressing concerns on delivery and phasing. How robust are delivery rates lead in times current situation of the sites regarding infrastructure requirements and funding	Included within the Housing Position Statement 2018: Technical Update, in particular Annexes 1-5

etc.)Detail to be provided in letter from Inspector)
Sites identified as having specific concerns to external participants attending Matter 3 session.

- Angel Way, **Romford retail** park former Decathlon site.
- St George's Hospital other sites -evidence site will go ahead and phasing. Time table for delivery intention of landowner Bellway confirm
- Quarles Campus, Harold Hill – evidence site will proceed and phasing
- Beam Park confirmation from Countryside intending to take forward including phasing details
- Bridge Close Romford update timeframe update
- Rom Valley Way – confirm phasing and if any infrastructure issues
- Depot Rainham
- North Street site
- Gasworks site - contamination
- Matalan site- still trading. Allocated in RAAP.

The sites above were identified by external participants following specific questioning by inspector.

Clarify which sites are in the Strategic Development Areas and the Twelve Estates programme (to address concerns about tables)	Annex 1 of the Housing Position Statement 2018: Technical Update clearly sets out where each site is located
Completions to March 2018 need to ensure borough- wide figure or not. Need to explain the figures	Completions are identified in the updated housing trajectory (Annex 1 of the Housing Position Statement 2018: Technical Update) and are discussed in Chapter 3
Confirm if small sites includes windfall sites (to avoid double counting)	Both small sites and vacant sites returning to use are considered as windfalls. The small sites windfall does not include vacant sites returning to use. See paragraphs 6.27-6.28 of the Housing Position Statement 2018: Technical Update
Identify if pre-application proposals will they come forward. Discount ones with permission if can't come forward Small sites and vacant sites evidence 186 come forward?	See paragraphs 6.60-6.68 of the Housing Position Statement 2018: Technical Update
Need to check completion figure 2016/17 on GLA database and need to explain any difference	The figures have been updated to reflect the most data from the LDD as of November 2018.
Modification Policy 3 Housing Supply to identify plan period and when review of Local Plan will take place (link to London Plan adoption)	Included as Annex 12 of the Housing Position Statement 2018: Technical Update
Explain time frame for SAA document. Make clear which parts of LDF superseded by the Local Plan	LDS updated included in Havering Local Development Scheme- Policies superseded if Local Plan adopted document
Include Mercury / Ellandi proposal in Housing Trajectory	Response contained in the Further response from London Borough of Havering to Inspector document
Check Sandgate Close site in Housing Position Statement	Response contained in the Further response from London Borough of Havering to Inspector document
Matter 3 Housing other matters (Policies 4-10)	

Modification Policy 4 - change 1st paragraph where it says more than 10 units to say 10 or more units as per wording in London Plan	Included on Modifications list
Modification Policy 4 – Council to consider whether the policy should reflect the viability assessment which indicates that 50% affordable housing would be viable in certain circumstances and / or consider trade-off between affordable and other elements such as workspace	Included on Modifications list
Modification Policy 5 - needs to be clearer the flexibility of policy	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 5 - Does the word ‘robustly’ need to be included as modification? Should originally wording be kept and does it provide the flexibility required in this policy?	Response contained in the Further response from London Borough of Havering to Inspector document
Policy 6- Reference at 7.4.4 of Plan to a review of the need but this is not in the evidence base. The Inspector needs evidence relating to the need and supply. Where and when will the supply be provided in order to meet the identified need? Is there a need for specific site allocations to meet the need? (ensure this evidence is consistent with evidence being provided for Matter 3)	Response contained in the Further response from London Borough of Havering to Inspector document Older Person Report 2015
Policy 6- Reference data to London Plan and where there	Response contained in the Further response from London

might be discrepancies with Local Plan figures	Borough of Havering to Inspector document
Modification- Policy 6 –In relation to Criterion (i) need to be clear in policy how the Council will expect need to be identified	Included on Modifications list
Modification Policy 6 - criteria (vii) Delete ‘all possible’ before ‘future needs’.	Included on Modifications list
Modification Policy 6 - criteria (viii) need to revise wording to include ‘unacceptable’ before ‘adverse impact’ and refer to unacceptable levels of noise rather than ‘ significantly greater levels’	Included on Modifications list
Modification Policy 10 - add ‘significant’ after ‘results in’	Included on Modifications list
Council to consider if specific Regeneration Policy is required	Included on Modifications list
Matter 4 : Gypsy and Traveller	
Review GTAA information regarding ‘unknown’ households and revise as necessary (Detail to be provided in letter from Inspector)	Included in updated GTAA Contained in Response to Inspector letter November 12 th 2018 document
Consider the scope for unauthorised pitches to help address identified needs (Detail to be provided in letter from Inspector)	Contained in Response to Inspector letter November 12 th 2018 document
Matter 5 : Green Belt	

Why Council had adopted a change in position for the GB38 brownfield site, especially in circumstances where we may not be able to meet 5 year demand. Provide further information regarding why this site has not been allocated. (Cardrome)	Response contained in the Further response from London Borough of Havering to Inspector document
Modification - include indicator for monitoring of office development	Included on Modifications list
Matter 6 : Economy and employment	
Need to ensure capturing details of released industrial sites in work for Matter 3.	The housing trajectory (Annex 1 of the Housing Position Statement 2018: Technical Update) identifies industrial land that has been identified for release in the Employment Land Review 2015.
What amount of land is required for waste activity purposes in Havering as outlined in Joint Waste DPD. Would the loss of the land not included in the current boundary for the Freightmaster estate impact on this.	Response contained in the Further response from London Borough of Havering to Inspector document
By not allocating sites for waste uses in local plan will this impact on Joint Waste DPD?	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 19 - PM 82- need to revise the wording related to market signals and need to either quantify the wording or take out that wording. Review the CRBE suggested modification wording for clarity and flexibility	Included on Modifications list
Policy 19- PM83- Where in London Plan is the reference to	Response contained in the Further response from London

the Port of London Authority	Borough of Havering to Inspector document
Policy 19- PM 84- 9.14 wording where in London Plan can this be found?	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 21 – reword the policy to reflect the text on flexibility as stated in the policy justification. With a case by case basis highlighted	Included on Modifications list
Modification Policy 21- para. 9.3.4 explain what is meant by “to the satisfaction of the council” Review paragraph with view to changing the wording to say what do we mean by to the satisfaction of the council both on and off site and viability. This need to be made clear. Note should be paragraph 9.3.13	Included on Modifications list
Modification Policy 21- para. 9.3.7 need clarification of wording(Now 9.9.6)	Included on Modifications list
Modification Policy 21-para. 9.3.8 Local market rates needs to be clear about what this means. Provide a further modification to explain.	Included on Modifications list
Policy 21- Provide evidence/reference from current London Plan on affordable workspace.	Response contained in the Further response from London Borough of Havering to Inspector document
Matter 7 : Town Centres and Communities	
Modification Policy 13 - set out in supporting text that the extra comparison retail space will not be required	Included on Modifications list

till after plan has been reviewed	
Policy 13- Need to provide further evidence that retail development needs can be met in existing town centre foot print. PBA to prepare a briefing paper	Response contained in Havering Local Plan (2016-2031) Supplementary Retail Note December 2018
Policy 13- Need to provide the evidence to compare the vacancy rates with other areas in London. Need further justification for the proposed lower threshold for impact assessments (locally set threshold justification)	Response contained in Havering Local Plan (2016-2031) Supplementary Retail Note December 2018
Modification Policy 12 - make clear that final paragraph which reads “Developers are required to consider wider local/regional primary care and other health strategies, as appropriate, to taken in to account how any developments can contribute to the aims and objectives of those strategies.” only refers to major developments	Included on Modifications list
Modification Policy 15 – delete criteria (iv) and (vi)	Included on Modifications list
Modification Policy 17- remove ‘on site’ in criteria (vi) to be clear that parking can be provided off site if safe to do so. Also delete from explanatory text in para. 8.5.9	Included on Modifications list
Matter 8: Connections	
Policy 24 Parking standards - If the inspector finds that that the plan is not sound in relation to this issue, is there any middle ground which can be met that will satisfy the requirements of both TfL and LBH?	Response contained in the Further response from London Borough of Havering to Inspector document- Addendum Included on Modifications List

How would Council modify the policy to make it sound? LBH and TFL to investigate compromise	
Highways England- MOU to be completed and sent to Inspector	See above (Matter 1)
Matters 9, 10 and 11 : High quality places, Green places and Minerals	
Modification Policy 28 – revise to ensure final paragraph consistent with NPPF. Retain first sentence of final paragraph and delete remainder	Included on Modifications list
Modification Policy 30 - change wording to reflect NPPF paras. 113-118.	Included on Modifications list
Policy 31-32 cross reference to changes to wording with EA responses. Are there any outstanding issues from EA response which have not been incorporated into the Plan?	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 31 – clarify that it will only apply to ‘major developments’	Included on Modifications list
Policy 35 - check consistency with London Plan	Response contained in the Further response from London Borough of Havering to Inspector document
Modification Policy 36 – add a new criteria for unacceptable adverse impact on highway safety to overcome HE concern regarding a site allocation Add reference to criteria used to identify potential locations in accordance with NPPF	Included on Modifications list

<p>Add 'adverse' before 'impact' in criteria (iii)</p> <p>Add reference to NPPF in criteria (v) before 'Ministerial Statement....'</p>	
<p>Modification Policy 38 – add 'at least' in front of 7 years</p>	<p>Included on Modifications list</p>
<p>Matter 12 : Infrastructure, implementation and monitoring</p>	
<p>Implementation - Table number needs changing table 3 or table 4?</p>	<p>Included in Modifications list</p>
<p>Implementation - provide details that infrastructure will be taken forward and funded and if did not get funded could development still go ahead (eg Rainham creek bridge) (This is part of information required for Matter 3)</p>	<p>Response contained in the Further response from London Borough of Havering to Inspector document</p>
<p>Modification to Monitoring section and Annex 8 Table 10 - to add in trigger points and targets and what will Council do if policy not working.</p>	<p>Included in Modifications list</p>