



CABINET

August 5 2020

Subject Heading:

Havering Local Plan - Agreement to consult on Local Plan Main Modifications, make minor alterations and send formal response back to Planning Inspector and agreement to publish temporary changes to the Council's Statement of Community Involvement in response to Government guidance relating to Covid 19 and public consultations on planning documents.

Cabinet Member:

Councillor Damian White
Leader of the Council

SLT Lead:

Barry Francis
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Policy context:

National Planning Policy Framework (2019)
London Plan (2017)
Havering Corporate Plan 2019/20
Havering Local Development Framework (2008)

Financial summary:

The Cabinet report on the MTFS Update (September 2019) included details of the budget for Local Plan work in 2020/2021 and 2021/2022 (£0.557m and £0.200m, respectively).

Residual business risk reserve funding of £0.434m not utilised in 2019/20 has been carried into 2020/21.

Is this a Key Decision?

Yes

Cabinet, dd mmmm yyyy

When should this matter be reviewed? August 2022

Reviewing OSC: Towns and communities

The subject matter of this report deals with the following Council Objectives

Communities making Havering	<input type="checkbox"/>
Places making Havering	<input type="checkbox"/>
Opportunities making Havering	<input type="checkbox"/>
Connections making Havering	<input type="checkbox"/>

SUMMARY

The new Havering Local Plan will assist the Council in the delivery of its planning and regeneration objectives and programmes and help ensure that Havering remains a place where people wish to live, visit and work and where businesses can prosper. It will also set a framework for the timely and effective delivery of infrastructure needed to support Havering's communities.

Havering submitted its new Local Plan for formal Examination by an independent Inspector in March 2018 following statutory and non-statutory public consultation in 2015 - 2017.

Following Examination hearings in 2018 and 2019, and the undertaking of work required by the Local Plan Inspector, proposed Main Modifications have been prepared that the Inspector considers are necessary to find the Local Plan 'sound'.

The report outlines the progress through the Local Plan Examination process and sets out details of the proposed Modifications including those linked to parking, housing and gypsy and traveller matters.

Members are asked to note the proposed Main Modifications and changes to some elements in the evidence base supporting the Local Plan. Members are also asked to agree to these being the subject of a further period of public consultation in line with the regulations and legislation for the preparation of Local Plans.

The Government has emphasised the importance of plan-making continuing during the Covid 19 pandemic as it wants to see Local Plans progressing through the plan-making system as a vital means for supporting the economic recovery. In line with this, the report brings forward recommended temporary changes to the Council's 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.

Subject to the outcomes from the public consultation and the final report from the Local Plan Inspector and Member approval, it is anticipated that the Local Plan may be adopted in winter 2020/2021. In line with the instructions from the Local Plan Inspector, and as reflected in the Proposed Main Modifications, the Council will be required to initiate work to bring forward an immediate update of the Local Plan immediately after its adoption.

The Local Plan will be important in helping the community in Havering to move forward from the adverse effects of the Covid 19 virus.

The report also notes that the opportunity will be taken following the adoption of the Local Plan to revise and update the Local Development Scheme document which sets out the Council's planned work in bringing forward planning policies and guidance.

Cabinet, dd mmmm yyyy

RECOMMENDATIONS

That Cabinet/Members:

- (1) note and consider the proposed Main Modifications and changes to the supporting evidence base documents resulting from the Local Plan Examination including, specifically, the Proposed Main Modification for car parking.
- (2) agree the Proposed Main Modifications and changes to supporting documents resulting from the Local Plan Examination (as set out in Annexes 2 – 16) being the subject of public consultation
- (3) agree the proposed ‘minor’ changes following the Local Plan Examination and publish these for information (as set out in Annex 17)
- (4) agree to publish a ‘composite’ Local Plan document (including Proposed Main Modifications and proposed ‘minor’ changes) for information (as set out in Annex 18)
- (5) agree the recommended temporary amendments to the Council’s Statement of Community Involvement (as set out in Annex 19) which sets out how the Council will undertake public consultation when preparing Local Plans and publish this
- (6) note / agree the Equalities Impact Assessment informing the amended Statement of Community Involvement (as set out in Annex 20)
- (7) delegate responsibility to the Director of Neighbourhoods in consultation with the Leader of the Council, for the Council’s formal response to the Local Plan Inspector following the consultation (including the agreement of any further changes to the Main Modifications and supporting documents considered necessary)
- (8)** agree to publish the outcomes of the public consultation
- (9) to note that the current Local Development Scheme document will be revised and updated following the adoption of the Local Plan

REPORT DETAIL

4.0 The background to this report and what it covers

1.1 Members were originally scheduled to consider a report at the April 2020 Cabinet meeting on the:

- outcomes from the Local Plan Examination hearings in 2018/19; and
- the next steps towards the adoption of the new Havering Local Plan including the requirements for public consultation

1.2 The April Cabinet meeting was cancelled as a result of the 'lock-down' resulting from the Covid 19 pandemic. Additionally, the restrictions in place as a result of the 'lock-down' would have prevented the Council undertaking the necessary public consultation in a manner which would satisfy its commitments as set out in its adopted Statement of Community Involvement (SCI). The SCI sets out the detail of how the Council will ensure that stakeholders (including residents) are able to engage in the plan-making process. This includes, for example, copies of documents being available in places visited by the public such as libraries and the Public Advice and Service Centre in Romford in the recognition that not everyone has access to on-line facilities and / or may prefer to use 'hard copies' of items.

1.3 This report seeks approval for Proposed Main Modifications and evidence base updates to the Local Plan submitted to the Government and which has been the subject of an Examination by an independent Local Plan Inspector. The Proposed Main Modifications and evidence base updates are considered in Sections 4 – 10 of this report.

1.4 Additionally, in line with the latest requirements set out by the Government, and in response to the constraints imposed by the 'lock-down' linked to the Covid 19 pandemic, the report brings forward recommended temporary changes to the Council's Statement of Community Involvement. These will set out how the Council will address its commitments and responsibilities in regard to providing stakeholders with an effective opportunity to be involved in plan-making in Havering.

1.5 The need for these changes arises because the Government wishes to ensure that plan-making continues during the current pandemic because it sees Local Plans as a key 'tool' in securing economic recovery. The recommended approach to undertaking public consultation is set out in Section 12 of this report. Members are asked to approve these changes and their publication in line with the latest Government planning guidance.

- 1.6 Finally, the report notes in Section 14 that following the adoption of the Local Plan the Council will revise and update its current Local Development Scheme 2019-2021 document. The Local Development Scheme sets out the Council's programme for preparing planning policy documents and guidance and is required by legislation to be up to date. Having an up to date LDS is also 'best practice' and enables the community and other stakeholders to understand what plan-making activities the Council will undertake.

2.0 What is the Havering Local Plan and why it has been prepared

- 2.1 It is a statutory requirement that local planning authorities have an up to date Local Plan. Havering has prepared a new Local Plan to update and replace the Havering Local Development Framework (2008) and to set out its planning and regeneration objectives.
- 2.2 The new Local Plan will provide planning policies to guide development and to help ensure that the borough remains a place where people wish to live, work and visit and where businesses wish to invest and can prosper.
- 2.3 The Local Plan will also provide an important context for securing and guiding the provision of the infrastructure necessary to support the community in Havering over the Local Plan period including transport connections, schools and health facilities and utilities.
- 2.4 The Council will use the Local Plan (and supporting evidence such as the Infrastructure Delivery Plan) in its engagement with third parties concerned with the provision of infrastructure to ensure that there is a good 'fit' between the change and growth set out in the Local Plan and the infrastructure needed to support that.
- 2.5 The new Local Plan will provide an up to date planning framework to help Havering emerge from the 'downturn' associated with the Covid 19 pandemic particularly in regard to helping ensure that Havering has a robust and resilient economy that will be well suited to the new circumstances and opportunities.

3.0 Earlier public consultation on the Local Plan

- 3.1 The Local Plan has been the subject of extensive public consultation over the course of its preparation in line with the legislation and regulations for the preparation of Local Plans.
- 3.2 These comprised:
- statutory consultations in Spring 2015 and Summer 2017 (Regulation 18 and 19 stages, respectively)

- non-statutory consultation on a 'Direction of Travel' document in Autumn 2016
 - a specific public consultation linked to gypsy and traveller matters in Spring 2019 at the request of the Local Plan Inspector following the initial Examination hearings in Autumn 2018
- 3.3 Members have had the opportunity to comment on the Local Plan throughout its preparation including informal workshops/'drop-in sessions' with officers in spring 2017 before the Local Plan was finalised for submission.
- 3.4 A briefing on the Examination into the Havering Local Plan was provided on March 3 2020 for all Members. Its purpose was to bring all Members up to speed on the progress with the Local Plan and main modifications proposed ahead of the planned Cabinet meeting in April 2020 and enable Members to be fully appraised of the key outcomes from the Examination to date.
- 3.5 More than twenty Members attended the event and were able to ask questions to officers on the position with the Local Plan and the Examination. The Legal Counsel (Planning Barrister) who has supported and guided the Council throughout the Examination process attended the briefing and responded to several Member questions.
- 3.6 In line with the Council's Statement of Community Involvement and 'best practice', the Council's website has provided extensive information about the preparation of the Havering Local Plan and comprehensive coverage of the Examination in Public from when the Local Plan was submitted to the Secretary of State in March 2018 (see below).

4.0 Overview of the Local Plan Examination in Public and its outcomes

- 4.1 Following public consultation in 2017, the Local Plan was submitted to the Secretary of State in Spring 2018 to enable its independent review by a Local Plan Inspector appointed by the Secretary of State.
- 4.2 In October 2018, the first part of the Havering Local Plan Examination in Public (EIP) took place over 6 days of Examination hearings. The initial Examination hearings addressed twelve Matters as previously identified by the Inspector:
- Legal compliance and Duty to Cooperate
 - Spatial Strategy and Strategic Development Areas
 - Housing
 - Gypsy and Traveller accommodation
 - Green Belt
 - Economy and employment
 - Town Centres and communities
 - Connections

- High Quality Places
 - Green Places
 - Minerals
 - Infrastructure, implementation and monitoring
- 4.3 Prior to the Examination hearings commencing, the Council provided written statements (responses) to around 150 questions that the Inspector had raised across these topics.
- 4.4 Following the initial hearings in October 2018, the Inspector:
- requested additional information across the topics identified above; and
 - the commencement of the preparation of proposed modifications in relation to a number of matters including housing, Gypsy and Travellers and parking which would be linked to, and reflect the outcomes from, the further work required by the Inspector
- 4.5 The Council submitted substantial and robust responses to the Local Plan Inspector in December 2018 and March 2019. As mentioned above, details of these were included on the Council's website and in the relevant Calendar Briefs.
- 4.6 A further 2 days of Examination hearings took place in May 2019. These focussed on housing, Gypsy and Travellers and parking.
- 4.7 Following these hearings, the Inspector required:
- that the Council modify **Policy 24: Parking provision and design** to accord with the comments of the London Mayor to ensure that the Local Plan will be in 'general conformity' with the current London Plan (which has provided the planning policy context for the Local Plan Examination)
 - further information on the housing data underpinning the Local Plan including 'refreshing' and updating the Housing Position Statement and its Housing Trajectory) and linked revisions and updates to the relevant policy in the Local Plan (**Policy 3: Housing supply**)
 - further information relating to Gypsy and Traveller and Travelling Show people matters including a full update of the Gypsy and Traveller Accommodation Needs Assessment to reflect the position as at July 2019. This involved extensive engagement with the Gypsy and Traveller community and detailed appraisals of each of the sites proposed to be allocated for use by Gypsy and Traveller households and, subsequently, once this information was agreed, linked revisions to the relevant policy in the Local Plan (**Policy 11: Gypsy and Traveller Accommodation**)
 - evidence base updates (for example, to the retail study)

- the preparation of a comprehensive schedule of draft Proposed Main Modifications to the Local Plan
- updates to technical supporting material such as the Habitats Regulations Assessment, the Health Impact Assessment and the Sustainability Appraisal to reflect the changes set out by the Inspector from the Examination hearings

4.8 In late November 2019, the Inspector also asked the Council for an assessment of the implications for the Havering Local Plan arising from the report (published in early October 2019) from the Panel of Inspectors responsible for the Examination in Public into the London Plan.

4.9 A response was prepared by Council officers and submitted to the Local Plan Inspector who has advised that she has now 'closed' this matter. Further brief commentary on the current position with the London Plan is set out below (in Section 12 of this report).

5.0 The outcomes from the Examination in Public so far

5.1 The Inspector concluded in January 2020 that the Council has supplied her with all the information she requires. The Inspector has advised that as it was submitted the Local Plan is 'unsound' but she is minded to recommend that the Local Plan could be found 'sound', subject to it including a number of Main Modifications.

5.2 The approach whereby a Local Plan Inspector determines that a Local Plan (as submitted) is 'unsound' but could be found 'sound' subject to including an agreed package of Main Modifications is typical of the way that Local Plans are progressed by Local Plan Inspectors.

5.3 Section 20 of the National Planning Policy Framework (2019) requires that a Local Plan is 'sound'. Paragraph 35 of the Planning and Compulsory Purchase Act 2004 explains that to be 'sound' the Local Plan must be:

- positively prepared
- consistent with national policy
- justified and effective

5.4 The Inspector now requests that the Proposed Main Modifications that she has required be published for public consultation along with a number of other 'supporting' items (including evidence base items that have been updated over the course of the Local Plan Examination).

6.0 Overview of the proposed Main Modifications

6.1 In general, and to address the requirements to be 'sound', the Inspector is requiring Proposed Main Modifications for the Havering Local Plan that will:

- bring a policy in the submission Local Plan into line with national planning policy and /or the London Plan
- ensure a policy reflects the latest evidence underpinning the Local Plan
- respond to third party representations (during the previous consultation(s) or at the Local Plan Examination hearings

6.2 The proposed Main Modifications that the Inspector wants taken forward take account of evidence by the Council and third parties (such as developers and their professional advisers) which was considered at the Examination in Public sessions.

6.3 The legislation requires that Proposed Main Modifications are identified in a comprehensive and detailed schedule highlighting specific changes and the reasons for those changes. The Inspector has advised that they should be progressed without prejudice to her conclusions in relation to the 'soundness' of the Plan.

6.4 In line with the Regulations covering the preparation of Local Plans, and subject to Member approval, public consultation on the proposed Main Modifications and specific updates to the evidence supporting the Local Plan (as also required by the Inspector) must now be undertaken.

6.5 This report seeks agreement:

- to undertake public consultation on the Proposed Main Modifications as well as specific updates to some parts of the evidence base supporting the Local Plan. Commentary on the recommended public consultation is set out in Section 12 of this report.
- that following the public consultation, the results of the consultation along with any comments from the Council on these (including any further changes to the proposed Main Modifications or the supporting documents that the Council considers appropriate) are submitted to the Local Plan Inspector in order to proceed further with the Local Plan examination process and to progress the Local Plan towards its adoption subject to Member approval at forthcoming Cabinet and Council meetings.

7.0 What the proposed Main Modifications comprise

7.1 In total, 28 Main Modifications are proposed by the Local Plan Inspector. No Main Modifications are proposed to Policies: 8, 9, 14, 16, 18, 25 - 27, 29, 32 - 35, 37 and 39 of the submission Havering Local Plan.

- 7.2 For the convenience of Members, the Local Plan text and policies proposed to be subject to proposed Main Modifications are listed for information purposes in **Annex 1** to this report. **Annex 2** to this report comprises the formal schedule of Proposed Main Modifications required following the Local Plan Examination hearings which is recommended for approval. **Annex 3** details proposed changes to the Proposals Map linked to the Proposed Main Modifications which are recommended for approval. A schedule of the remaining Annexes (numbers 4-16) that includes evidence and supporting items recommended to be approved for public consultation is set out later in this report in Section 11 in paragraph no.11.6.
- 7.3 It will be seen from **Annex 2** that in most cases, the proposed Main Modifications from the Local Plan Inspector involve relatively modest changes to a policy or its reasoned justification (ie the supporting explanatory text to the policy). These changes are to address the matters highlighted above in Section 5.0 (in paragraph no. 5.3) and in Section 6.0 (in paragraph 6.1).
- 7.4 Annex 2 shows that the proposed Main Modifications to Policies 3, 11 and 24 (dealing with Housing supply, Gypsy and Traveller accommodation and Parking provision and design, respectively) are more wide-ranging.
- 7.5 Section 8 of this report looks at the proposed Main Modifications for these policies in more detail including the reasons for the Proposed Main Modifications and the background to them.
- 7.6 Officers consider that notwithstanding the Proposed Main Modifications to the policies identified above (and those considered in more detail below), that the outcome(s) for the new Havering Local Plan from the Examination are broadly favourable.
- 7.7 Importantly, the overall thrust and direction of the Local Plan as submitted for Examination in March 2018 has been retained. Subject to the outcomes from the forthcoming public consultation and the final Inspector's report, it is considered that when it is formally adopted the Local Plan will have a positive role in the delivery of the Council's planning and regeneration objectives and programmes and contribute significantly to the Council's place-making roles and responsibilities. In line with Government intentions about the role of Local Plans, it will assist communities and businesses in Havering to emerge strongly and well placed from the challenging past few months.
- 8.0 The proposed Main Modifications in the Local Plan for Policies 3, 11 and 24 (housing supply, Gypsy and Traveller Accommodation and Parking provision and design, respectively)**
- 8.1 The following section of the report looks at the changes ('Main Modifications') required by the Local Plan Inspector to these policies.

- 8.2 The review considers the proposed Main Modification for Policy 24 first because the outcome(s) from this policy being implemented with the Proposed Main Modification to the policy are significantly different to those that would arise from the implementation of the policy as it was included in the submission Local Plan.

a) Policy 24: Parking provision and design

- 8.3 In its submission Local Plan, the Council set out a minimum parking provision in the 'most accessible' areas of Havering of 0.5 car parking spaces per residential unit.
- 8.4 In this context, 'most accessible' encompasses sites being close to/served by 'dense' public transport provision. Such provision offers users a choice of modes/routes and destinations. In practical terms, this typically means living close to transport 'hubs' such as several bus routes and/or train and underground services.
- 8.5 In contrast, to what was included in the submission Local Plan, the current London parking standard says that residential units in these 'most accessible' areas should have significantly less than 1 parking space per residential unit.
- 8.6 The Council robustly maintained its position throughout the Examination hearings (and subsequent to that) that it was appropriate for the Local Plan to address parking provision in these areas as set out in the submission Local Plan (ie a minimum of 0.5 car parking spaces per residential unit).
- 8.7 In preparing the submission Local Plan, the Council took this position because it has robust and up to date evidence through its own parking study (undertaken specifically to support the submission Local Plan) that residents in town centres in Havering have higher levels of car ownership.
- 8.8 The Council considers, therefore, that its approach in the submission Local Plan (minimum parking provision of 0.5 spaces per unit) reflects transport circumstances in this borough compared to other parts of London especially inner and Central London where there is better public transport provision and lower levels of car ownership and use. The Council was also strongly of the view that by requiring a minimum of 0.5 spaces per residential unit in its proposed policy that this is well within the London Plan standards of significantly less than 1 parking space per unit.
- 8.9 Following the Examination hearings and, in the light of representations from the London Mayor (through Transport for London), **the Inspector has rejected the Council's approach as set out in its submission Local Plan.** The Council has carefully considered the scope to take forward a legal challenge against this outcome. In the light of informal advice from the legal Counsel who has assisted with the Local Plan at its Examination, it has reluctantly concluded that a challenge would not be in the best interests of

Havering and it does not propose to take a challenge forward for the following reasons:

- the likelihood of a successful outcome from a legal challenge is very small
- it would be costly to prepare and progress a legal challenge at a time when the Council's resources need to be carefully prioritised
- the Council wishes to see the Havering Local Plan adopted as soon as possible in order that its wider planning and regeneration objectives can be delivered and a challenge would delay adoption

8.10 Instead, the Inspector is requiring a Proposed Main Modification to this policy that will apply the current London Plan standard of less than 1 space per residential unit to those areas in Havering that Transport for London considers have the highest levels of public transport accessibility. In the view of the Local Plan Inspector, this Proposed Main Modification is required to ensure that the Local Plan is in 'general conformity' with the London Plan as required by the planning legislation for the preparation of Local Plans.

8.11 The Council considers that an approach that requires new development to provide such low levels of parking provision is very unsatisfactory since it is likely to result in residential developments coming forward with no car parking or very little parking. It will be wholly unsuited to circumstances in Havering having regard to how people live and travel which is itself a reflection of the practical limitations of public transport provision in Havering leaving residents little option but to use a private vehicle. It will create adverse impacts on pedestrian and highway safety, adverse environmental implications and be visually intrusive in residential areas. It would fail to recognise that like many other Outer London boroughs, Havering has higher levels of car ownership and new residential developments need to make proper provision for these in their layout and design. As mentioned above (paras. 8.3-8.9), the Inspector has discounted the Council's approach which sought to secure a minimum provision (of 0.5 vehicle spaces per residential unit) which the Council considered would better reflect local circumstances and would help to ensure that developments are provided with at least some car parking.

8.12 Notwithstanding this unsatisfactory outcome in regard to town centre developments, through its evidence work and responses to the Inspector, the Council has secured some welcome flexibility for the parking standards applicable in Havering for areas of lower PTALs which includes the residential and rural areas of the borough which are further away from established centres. Specifically, the Inspector has agreed a proposed modification to the policy that secures more generous parking provision for those areas assessed as PTAL0-2 and are more than 800m away from existing or planned London Underground or railway stations.

8.13 The **Proposed Main Modification for this policy is MM22** in the schedule included in Annex 2.

b) Policy 3: Housing supply

8.14 The additional work informing the Proposed Main Modification to Policy 3: Housing supply has been required by the Inspector and/or to address third party concerns from landowners and developers and specific bodies such as the Home Builders Federation.

8.15 The work has been aimed at ensuring that the Local Plan can demonstrate robustness of data and confidence in the Council being able to show a 5 year housing land supply (as required by the National Planning Policy Framework).

8.16 As previously advised, to support and inform Policy 3, the Inspector has also required the preparation of individual appraisals for each of the sites addressed through the Council's Housing Trajectory which shows anticipated housing delivery over the period of the Local Plan.

8.17 The outcome of this extensive work is a Proposed Main Modification to Policy 3: Housing Supply that:

- clarifies that due to the nature of housing supply in the Local Plan, the Council has adopted a 'stepped target' approach to housing delivery over the first 10 years of the Plan period so that there are different annual housing targets for housing delivery over specific phases of the Local Plan period. A new table is included to set out the 'stepped' targets over the periods 2016/17 - 2020/2021, 2021/22 – 2025/2026 and 2026/2027-2030/2031
- provides updated housing numbers expected to be delivered for key areas of change and growth in Havering including the Strategic Development Areas of Romford and Rainham, the Council's Twelve Estates Regeneration programme(s) and other major sites encompassing potential capacity overall to deliver at least 13,095 new homes over the first 10 years of the Plan period
- Explains the Council's approach to assessing its 5 year land supply and highlights that the Local Plan now shows 5.34 years supply at adoption of the Local Plan based on using a 'stepped' annual housing target
- reflects the 'linked' revisions to the Housing Position Statement document which supports and informs the Havering Local Plan and, in particular, Policy 3: Housing Supply

8.18 The **Proposed Main Modification for this policy is MM6** in the schedule included in Annex 2. The supporting items recommended for approval are set out in Annexes 8, 9, 10 and 11.

c) Policy 11: Gypsy and traveller accommodation

8.19 The additional work on **Policy 11: Gypsy and Traveller accommodation policy** has been required by the Inspector to:

- better reflect the requirements set out in national planning policy guidance specifically 'Planning Policy for Traveller Sites' (2015); and
- Establish that the accommodation needs of this part of the community over the period of the Local Plan have been accurately assessed as is required by the legislation.

8.20 The work required by the Inspector encompassed the Council's consultants (Opinion Research Services – ORS) undertaking further extensive additional survey work (in the form of face to face interviews) with the Gypsy and Traveller and Travelling Showpeople households and their representatives.

8.21 This work took place in summer 2019 following the May 2019 Local Examination hearings and included many site visits and detailed discussions with the households.

8.22 Subsequently, extensive mapping work was done by the consultants and Council officers using the household survey information secured from the households to assess the capacity/suitability of sites to accommodate the necessary number of households/pitches/plots in line with the identified household growth.

8.23 Importantly, the approach in the proposed Main Modification has recognised the advantages arising from the households being able to contribute meaningfully to the survey work. It has helped to ensure that their views and choices about living arrangements have been reflected in the proposed site layouts and accommodation units etc.

8.24 In line with national planning policy in 'Planning Policy for Gypsy and Traveller Sites (2015)', the Inspector has required that the Council show that accommodation needs for Gypsies and Travellers and Travelling Showpeople can be met over specific periods in the Local Plan period. The Local Plan shows this can be done on existing identified sites in the first five years and then household growth between 2021-2026 can be met at seven existing sites that have the capacity to accommodate further growth.

8.25 The outcome of this work is a re-modelled policy which robustly maintains the overall approach included in the submission Havering Local Plan for Gypsy and Traveller accommodation (Policy 11).

8.26 The proposed changes:

- bring the policy more into line with national planning policy requirements

- take account of the latest Gypsy and Traveller Accommodation Assessment report (July 2019 update) in regard to numbers of pitches required for Gypsies and Travellers and plots for Travelling Showpeople
- identify accommodation needs for Gypsies and Travellers and Travelling Showpeople over the Local Plan period as a whole and for specific 5 year periods within that as required by national planning policy
- identify how pitches for Gypsy and Traveller pitches and plots for Travelling Showpeople could be accommodated across the existing sites (including those previously identified in the submission Local Plan) and pitches at some further existing sites. The proposed sites to be allocated do not include two existing unauthorised sites at Benskins Lane and Willoughby Drive
- remove the sites proposed to be allocated for Gypsies and Travellers and Travelling Showpeople from the Green Belt and limit the use of these sites to accommodation for Gypsy and Travellers and Travelling Showpeople. The proposed modification to the policy makes clear that in the event that any of the sites are not used by gypsy and traveller or travelling showpeople households, then the level of protection afforded to them through planning will revert to if the sites had remained in the Green Belt
- clarify the detailed criteria that all sites proposed to be allocated for Gypsies and Travellers and Travelling Showpeople and any others for these groups coming forward must satisfy to secure planning permission
- re-iterates that the households will be required to 'regularise' the position at their respective sites by the submission and approval of appropriate planning applications
- re-affirm that national planning policy will be used to determine proposals that come forward later in the Plan period.

8.27 The **Proposed Main Modification for this policy is MM12** in the schedule included in Annex 2. The supporting items recommended for approval are set out in Annexes 12, 13, 14 and 15.

9.0 Overview of the changes to Policies 3, 11 and 24 (Proposed Main Modifications numbers: MM6, MM12 and MM22, respectively)

9.1 In summary, the revisions required by the Local Plan Inspector are:

- to more closely align the Local Plan with requirements in national planning policy (relevant to Policies 3 and 11 on housing supply and gypsy and travellers, respectively)
- because the Local Plan must be in 'general conformity' with the adopted London Plan (relevant to Policy 24 on parking provision)

10.0 Other work supporting the proposed Main Modifications

- 10.1 Aside from the documents which support and inform the Proposed Main Modifications (as discussed above), the Local Plan Inspector has also required that the Council review and update as necessary, some specific technical documents supporting the Local Plan comprising the:
- Sustainability Appraisal (SA)
 - Habitat Regulation Assessment (HRA); and
 - Health Impact Assessment (HIA)
- 10.2 Each of these was originally submitted to Secretary of State in March 2018 as part of the evidence base for the draft Local Plan. This latest review has been to reflect any positive or negative impacts because of the proposed Main Modifications.
- 10.3 The review of all of these documents concluded there were no negative impacts that were not already mitigated for in other parts of the Local Plan and therefore there was no need to undertake full and revised versions of the SA, HRA and HIA documents. The updated versions of these items which are recommended for approval are included in Annexes 4, 5 and 6.
- 10.4 Members are also recommended to approve updated evidence base items on older persons housing accommodation and a supplementary retail note (Annexes 7 and 16, respectively).

11.0 What documents will be included in the public consultation?

- 11.1 The legislation for the preparation of Local Plan requires that the Proposed Main Modifications (and other 'linked' items that support and inform the Proposed Main Modifications) are the subject of further public consultation.
- 11.2 In summary, the key items to be included in the public consultation will be:
- a proposed Main Modifications schedule setting out the proposed Main Modifications on a policy by policy basis and with a short explanation for the modification proposed. This item will be supported by a Schedule of Changes to the Proposals Map.
 - several updated evidence base documents (especially those linked to housing evidence and gypsy and traveller accommodation/sites)
- 11.3 At the direction of the Local Plan Inspector, the Council undertook some public consultation in April 2019 with the Gypsy and Traveller and Travelling Showpeople community on the emerging work supporting Policy 11. This work included revisions to the Gypsy and Traveller Accommodation Assessment and factual information relating to the individual sites in the form of a pitch deliverability matrix for each site. This work is included in Annex 14 to this report. The Inspector has requested that this information

also be included as part of the consultation on the proposed Main Modifications notwithstanding that parts of it have been superseded by the latest accommodation assessment in July 2019, further work on assessing the capacity of each site and the subsequent proposed modifications to the policy.

- 11.4 During the Examination, officers prepared and agreed a number of ‘minor’ changes with the Local Plan Inspector. These comprised small corrections, factual updates and ‘consequential’ adjustments linked to the Proposed Main Modifications. These items are in addition to a number of ‘minor’ changes that were delegated to officers in the course of preparing the submission Local Plan. A schedule of all the proposed ‘minor’ changes is included as Annex 17 to this report and is recommended for approval. The recommended proposed ‘minor’ modifications do not form part of the public consultation and any comments submitted on these will be discounted.
- 11.5 In order to assist understanding of the outcomes from the Local Plan Examination, the documents included in the overall suite of documents to be published will also include a ‘composite’ document comprising the submission Local Plan document with all the Proposed Main Modifications and all of the proposed ‘minor’ changes. This document which is also an **‘information only’ item will be outside of the public consultation** and is identified as Annexe 18. This document will be prepared and published after the Cabinet meeting since its content must reflect Annexes 2 and 17.
- 11.6 The schedule below sets out a list of the annexes for this report including those for formal approval. The schedule is repeated at the start of the annexes for convenience.

Schedule of the annexes to this report setting out items recommended to be approved for public consultation (other than Annexes 1, 17, 18, 19 and 20 which will not be subject to public consultation)

Annex Number	Title and content of annex
Annex 1	Summary table of text and/or policies with Proposed Main Modifications
Annex 2	Schedule of Proposed Main Modifications
Annex 3	Proposals Map Changes Booklet Addendum December 2019 (in light of Proposed Main Modifications)
Annex 4	Habitats Regulations Assessment: Havering Local Plan Proposed Main Modifications (April 2020)
Annex 5	Health Impact Assessment Review 2019: Report responding to Proposed Main Modifications to Local Plan (April 2020)

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Annex 6	Sustainability Appraisal (SA) for the Havering Local Plan: SA Report Addendum to accompany the Proposed Main Modifications (April 2020)
Annex 7	Review of 2018 Review of Specialist Older Persons' Housing
Annex 8	Housing Position Statement 2019 – Technical Update (October 2019)
Annex 9	Update to Annex 8 of the Housing Position Statement
Annex 10	Updates to Annexes 14.1, 14.2, 14.3 and 14.4 of the Housing Position Statement (comprising housing completions in Financial Years 2014 - 2017 (inclusive))
Annex 11	Housing Trajectory October 2019 (Update for the Local Plan Inspector)
Annex 12	Revised Gypsy and Traveller Accommodation Assessment Update report (July 2019)
Annex 13	Site Layouts Drawings (Supporting site layout material for revised Policy 11 Gypsy and Traveller accommodation)
Annex 14	Pitch Deliverability Assessments (Matrixes) (February 2019)
Annex 15	Gypsy and Traveller Accommodation and Proposals Map Changes (January 2020)
Annex 16	Supplementary retail note for the Havering Local Plan (December 2018)
Annex 17	Schedule of Proposed 'Minor' modifications to the submission Havering Local Plan
Annex 18	<p>'Composite' revised submission Havering Local Plan document (including Proposed Main Modifications and 'Minor' changes)</p> <p>[This item will be published after Cabinet following approval of Annexes 2 and 17]</p>
Annex 19	Amended Statement of Community Involvement (Covid 19 Update)
Annex 20	Equalities Impact Assessment for the amended Statement of Community Involvement

11.7 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 matrixes (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.

12.0 What the public consultation will encompass and what comments can address

12.1 At this late stage in the Local Plan preparation process, the public consultation on draft Proposed Main Modifications is, in effect, being undertaken on behalf of the Local Plan Inspector. It is a statutory requirement of the Local Plan preparation process. Notwithstanding this, the Council considers very strongly itself that providing opportunities for the community to view and comment on the preparation of planning policies is a fundamental part of the planning process and must be facilitated throughout each stage of the plan making process. The Council is committed to safeguarding the interests of the community in having opportunities to view consultation material and to comment upon it. Most importantly, the public consultation is only concerned with the Proposed Main Modifications and linked evidence base updates (see para. 12.14 below).

12.2 In doing this, the Council must ensure that the public consultation takes place in line with the previous consultation(s) on the Local Plan at the Regulations 18 and 19 stages and, importantly, in line with the commitments in its adopted Statement of Community Involvement.

12.3 The Council's current adopted Statement of Community Involvement (SCI) says public consultation at this stage will comprise:

- informing all stakeholders on the Local Plan database
- website publicity
- Statutory notice
- 'deposit' of copies of the documents at all Havering libraries and the Public Advice and Service Centre (PASC) in the Liberty Shopping Centre in Romford

12.4 The current circumstances on ensuring public health is safeguarded during the Covid 19 pandemic has required the Council to consider some adjustments to its approach to ensuring that the community can be fully engaged during this stage of the Local Plan preparation. For its part, the Government has made it clear that it sees Local Plans and plan-making

activities as being a key part of its 'exit strategy' from the Covid 19 pandemic and essential to helping to restore the economy. It is committed to ensuring, as far as is possible, that plan making continues during the pandemic.

- 12.5 In order to maintain momentum on plan-making, the Government has published guidance to local authorities about them making temporary changes to their SCIs to 'promote effective community engagement' and facilitate public consultation through 'means which are reasonably practicable'. Local authorities are not required to consult on any proposed changes to their SCIs brought forward to address the current 'unprecedented circumstances' but they should publicise them.
- 12.6 In the light of this, this report recommends that Members approve the publication of a number of temporary amendments to the Council's adopted SCI that will facilitate meaningful public consultation and engagement during this important stage in the plan preparation process. A recommended amended version of the SCI is included as Annex 19.
- 12.7 The proposed amendments to the SCI will help enable the Council to progress its Local Plan towards adoption at the earliest opportunity. In line with the guidance, it is proposed that the proposed amendments to the SCI will remain in place until the Government advises that authorities can safely revert to their usual public consultation measures as set out in their current SCIs.
- 12.8 The recommended amendments take account of the Government guidance that in considering 'new' approaches to consultation and engagement, authorities are strongly encouraged 'to use on-line engagement methods to their full potential'. The guidance also suggests that 'authorities will also need to take reasonable steps to ensure sections of the community that don't have internet access are involved and consider alternative and creative ways to achieve this'. These factors have been fully considered in the recommended approach set out below. The Council's website has already been updated to indicate that changes to the SCI are being considered.
- 12.9 It is recommended that putting in place the following amendments to the current SCI will optimise the opportunity for the community to be involved in the plan making process and be in line with the Government advice:
- direct notification of all consultees on the Havering planning policy database by email/letter and this will include representatives from local residents associations
 - advertising on the Council's website as well as marketing and profile raising via currently used social media platforms
 - Statutory Notice placed in 'Romford Recorder' newspaper

- 'hard' copies of documents provided on request
 - specific engagement with households in the Gypsy and Traveller community to explain the proposed modifications to the specific policy in the Local Plan for gypsy and traveller accommodation and to recognise that this is often a 'hard to reach' sector of the wider community who may also not be familiar with the detail of Local Plan preparation. Another reason for specific engagement with this part of the community is that it will better enable households within the community to start to consider the preparation of planning applications for their sites as required by the proposed modified policy (Policy 11: Gypsy and traveller accommodation). This approach will accord with the emphasis that the Local Plan Inspector has given to the plan making process engaging with this part of the community throughout the Examination process
- 12.10 In order to ensure that the public consultation on this latest stage in the Local Plan preparation is effective, fair and accessible, it is also recommended that the public consultation will be extended from the statutory 6 weeks period to 8 weeks to ensure that the community has adequate opportunity to be involved.
- 12.11 At the request of the Local Plan Inspector, the review of the Statement of Community Involvement has included a specific equalities impact assessment on this item. It will be submitted to the Local Plan Inspector. Members are asked to approve this item (included as Annex 20).
- 12.12 In the course of preparing this report, the Council initiated work to re-open its library services and libraries. It is understood that libraries are currently scheduled to re-open from mid-July on a phased basis and with robust protocols in place for users and staff. The availability of all libraries to be open with normal hours and their full facilities available to users to provide the 'deposit' locations for Local Plan documents as set out in the current SCI is not possible.
- 12.13 It is understood that in order to safeguard the health of library visitors and staff, the libraries which open will have reduced staff numbers, will be strictly controlled in regard to matters such as opening hours, numbers of visitors, duration of visitor stays and availability of documents and IT equipment. Whilst it is welcome that libraries are re-opening, it is considered that it will not be feasible for the libraries to have any role in 'hosting' public consultation linked to the Local Plan. It will be very impractical for the libraries to remove any Local Plan documents after they have been used by a library visitor and then placed in quarantine before being returned for public use since this may involve each library having a 'stockpile' of many copies of the individual documents and these being available on rotation to replace copies placed in quarantine.
- 12.14 In accordance with the existing requirements for the preparation of Local Plans, comments will only be allowed on the proposed Main Modifications in

Annexe 2 (and linked updated evidence/supporting items set out in Annexes 3-16) and not on the rest of the Local Plan (which is effectively 'closed').

- 12.15 No other comments will be considered. Earlier comments from third parties will not need to be re-submitted and the Inspector will not be re-opening debate/discussion on topics that are not within the proposed Main Modifications.
- 12.16 At this stage in Local Plan preparation, comments can be made by anyone but only on matters of 'soundness' and legal compliance of the proposed Main Modifications and evidence base updates.
- 12.17 Any comments submitted as a result of the forthcoming public consultation will be primarily for the consideration of the Inspector (although the Council will have to provide its own views on them).
- 12.18 At this stage, it is not possible to anticipate the scale or content of third party responses to the consultation so the potential impact of these on the programme for the adoption of the Local Plan and any further work required cannot be firmly identified.
- 12.19 Council officers have continued to maintain close liaison with the Local Plan Inspector and Programme Officer throughout the Examination period (including during the Covid 19 pandemic). The Local Plan Inspector has indicated her informal agreement to:
- the steps that the Council is being recommended to take in respect of publishing changes to its SCI
 - how the Council is now proposing to undertake public consultation on the Proposed Main Modifications and evidence base updates in order to maintain progress towards the adoption of the Local Plan whilst affording proper opportunities for engagement

13.0 Other matters linked to the Local Plan

- 13.1 It will be noted from the proposed Main Modifications (Annex 2) that the Inspector is likely to expect that the Council will commence an immediate update of the Local Plan following its adoption.
- 13.2 The Council envisages that it will be preparing further planning guidance in due course that will be linked to the Havering Local Plan. Work on a Masterplan for Romford to guide development is well advanced.
- 13.3 The Local Plan has to be in general conformity with the London Plan. The London Plan forms part of the development plan context for the purposes of planning in Havering. For the purposes of the Local Plan Examination, the Local Plan was considered against the then current adopted London Plan notwithstanding that at the time of the Examination, the Mayor was in the

later stages of finalising his draft London Plan ahead of the Examination in Public for that in the first part of 2019.

- 13.4 The Examination in Public into the draft London Plan concluded in mid - 2019. The Mayor responded to the report from the Panel of Inspectors by publishing his 'Intend to publish' version of the new London Plan and that was submitted to the Secretary of State in late 2019.
- 13.5 In response, the Secretary of State has identified a number of significant concerns linked to the preparation and delivery of the Mayor's planning strategy including particularly the delivery of housing.
- 13.6 The Secretary of State issued a number of Directions that the Mayor of London must address before the London Plan can be adopted. These Directions are in order to ensure that the London Plan is consistent with national planning policy as set out in the National Planning Policy Framework (2019).
- 13.7 Additionally, the Secretary of State has identified a number of specific areas where he considers that the London Plan has 'fallen short of best serving Londoners'. These include its ambition, policy for small sites, industrial land, housing mix, optimising density of development and aviation.
- 13.8 The Secretary of State requires that, along with the several Directions, these matters are addressed in the further work on the London Plan. He has asked the Mayor to take a collaborative approach to this and to work with Government officials to revise the London Plan. He expects the work to have a particular focus on housing delivery.
- 13.9 At the time of preparing this report, the Mayor had not responded to the Secretary of State.

14.0 Revisions and updates to the Local Development Scheme

- 14.1 The Council is required to set out its planned intentions regarding the preparation of planning policy and planning guidance in its Local Development Scheme (LDS). Cabinet at its meeting in July 2019 approved the current Local Development Scheme (2019 – 2021).
- 14.2 In order to ensure that the LDS accurately reflects the Council's intentions in regard to further work on planning documents, it is intended to revise and update the LDS once the Local Plan has been adopted. It will enable the LDS to include up to date programmes for the planned update of the Local Plan (as required by the Local Plan Inspector) and other work such as the Romford Masterplan and the preparation of any Supplementary Planning Documents to support and inform the interpretation of the new Local Plan.

15.0 Next Steps

- 15.1 Subject to approval, the Council will need to undertake public consultation for eight weeks on the Proposed Main Modifications and evidence base updates. It will need to consider the consultation responses to the consultation and advise the Inspector of its views on these including any changes it considers necessary and appropriate.
- 15.2 Subsequently, the Inspector will present her findings and recommendations on the examination in a final report.
- 15.3 The Inspector's report is 'binding' on the Council and the Council cannot change the contents. It is likely that the timing of this being received by the Council will be dependent upon the Inspector's other commitments with the Planning Inspectorate.
- 15.4 If the Inspector finds the Local Plan 'sound' and legally compliant, the Council will be able to proceed to formal adoption by means of Cabinet and Council approval(s). It is anticipated that this will be later in 2020 subject to the outcome from the public consultation and timing of the Inspector's further work and Member approval.
- 15.5 The recommended Proposed Main Modifications will make clear, at the instruction of the Local Plan Inspector, that the Council will initiate an immediate update of the Local Plan once it is adopted.

REASONS AND OPTIONS

Reasons for the decision:

The option of not going out to consultation on the proposed Main Modifications was rejected because:

- It is a statutory requirement for boroughs to have up to date Local Plans and not providing this additional information would mean the Inspector may not be able to make a decision on whether the Havering Local Plan is 'sound' and should be approved
- An adopted Local Plan will better enable the Council to maintain effective local control over planning in Havering to ensure that development is in the best interests of Havering. In the absence of an up to date and adopted Havering Local Plan, planning decisions would be taken with reference to the Government's National Planning Policy Framework and the London Plan. These strategies do not reflect local circumstances as well as a Local Plan prepared specifically for Havering

- An adopted Local Plan will better enable Havering to respond positively to the challenges resulting from the Covid 19 pandemic and this accords with the latest Government guidance

Having an up to date Local Plan will:

- enable the Council to bring forward other linked pieces of work such as Masterplans for Romford and Rainham
- support other planning and regeneration programmes
- assist the Council in its infrastructure planning necessary to support change and growth in Havering

It would not be possible to undertake the necessary public consultation on the Proposed Main Modifications and updated evidence base in line with the approach set out in the adopted Statement of Community Involvement (SCI) as specified locations for 'hosting' consultation documents (such as Havering's libraries and the Public Advice and Service Centre) have been closed during the 'lock-down'. In particular, not placing the consultation items at the required locations (Havering libraries and the Public Advice and Service Centre in Romford) would be contrary to the commitments set out in the Council's Statement of Community Involvement (which sets out how the Council will undertake public consultation on planning matters).

If consultation took place during the 'lock-down' and the community was not able to have reasonable access to consultation documents, there would be a risk that the Local Plan Inspector may consider that the Local Plan failed to meet requirements around legal compliance and the Local Plan could be found 'unsound'.

Bringing forward the recommended changes to the SCI (including lengthening the consultation period and using other tools and platforms) will enable the Council to ensure that stakeholders have the opportunity to have a meaningful engagement in the preparation of the Local Plan in line with the Council's commitment to engaging with the community in its plan-making work.

IMPLICATIONS AND RISKS

Financial implications and risks:

The submission of material to the Inspector following the Examination in Public (EIP) and the recommendations stated within this report has no direct financial implications.

The Cabinet report on the MTFS Update (September 2019) included details of the budget for Local Plan work in 2020/2021 and 2021/2022 (£0.557m and £0.200m, respectively).

An allocation £0.600m was identified from the Business Risk Reserve for Local Plan work in 2019/20. A residual amount of unspent monies (£0.434m from this has been carried over into 2020/21.

The costs of undertaking the public consultation can be met within the above budget.

There is a risk that final costs exceed the current funding provision available for this plan, and any overspend would therefore need to be contained within the service budget.

Legal implications and risks:

It is a statutory requirement for the Council to have a Local Plan in place and ensure the Local Plan is relevant and up to date. The statutory provisions under which a Local Plan is made are within the Planning and Compulsory Purchase Act 2004 (as amended) and regulations made under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Environment Assessment of Plans and Programme Regulations 2004. To not prepare a Local Plan runs the risk that the Secretary of State will 'step in' and prepare a Local Plan on behalf of the Council.

The Submission version of the Local Plan has been the subject of an assessment of the legal implications and risks in the original report to Cabinet dated 19 July 2017 and those legal comments do not alter as a result of this report.

The Local Plan was submitted to the Secretary of State for examination, along with the Sustainability Appraisal, evidence base and a statement of representations and main issues in line with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Following submission of the Local Plan to the Secretary of State an Independent Inspector during the assessment of the plan requested further information in order to be able to determine whether it has been prepared in line with section 20 of the Planning and Compulsory Purchase Act 2004 and Regulations 23 – 24 of the Local Plan Regulations 2012

If the Inspector considers that the Local Plan has not been prepared in accordance with the Regulations then the Inspector may direct the Council to repeat part of the pre-submission process or start the process again. Exceptionally, under Section 21(9) (a) of the Planning and Compulsory Purchase Act 2004 the Secretary of State has the power to direct a local planning authority to withdraw its submitted plan.

The main modifications set out in the appendix have been through legal review and it is recommended that public consultation commences in line with the proposed changes to the Statement of Community Involvement set out in Section 12 of the main report. The proposed changes to the SCI have been prepared to accord with the latest planning guidance from the Government.

In due course, following the adoption of the Local Plan, the revisions and updates to the Local Development Scheme will be undertaken as set out in the July 2019 Cabinet report and will enable the Council to evidence its further plan making work in line with legislative requirements and 'best practice.'

Human Resources implications and risks:

A full Human Resources Assessment was undertaken of the Local Plan as set out the Cabinet and Council reports for the Proposed Submission Havering Local Plan in July 2017.

There are no further human resources implications arising from this Cabinet report and decision.

Equalities implications and risks:

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have due regard to:

- (i) the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (ii) the need to advance equality of opportunity between persons who share protected characteristics and those who do not, and;
- (iii) foster good relations between those who have protected characteristics and those who do not.

Note: 'Protected characteristics' are: age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

A full Equalities Impact Assessment was undertaken of the Local Plan as set out in The Cabinet and Council reports for the Proposed Submission Havering Local Plan in July 2017.

The Local Plan will provide the Council with a strategic framework to help deliver a range of outcomes including new homes, jobs, local economic growth and improved social infrastructure for all residents across Havering including those who share the characteristics protected by the Equality Act 2010.

As such ensuring that the Local Plan has addressed these has been a priority in its preparation throughout the process since 2015. As the Local Plan has a key role in influencing the built environment and how people use it, a key aspect of the EIA is to ensure that access issues for people with disabilities is considered.

The Equality Impact Assessment that supports the Submission Local Plan was formally submitted with the Local Plan and the suite of supporting documents to the Secretary of State.

The preparation of the recommended amendments to the Statement of Community Involvement has been accompanied by a specific Equalities Impact Assessment.

As work progresses on forthcoming documents that will support and complement the Local Plan, further assessments of the Local Plan and its documents from an equalities impact assessment will be undertaken.

Health and Wellbeing implications and Risks

The Submission Local Plan has been subject to a comprehensive Health Impact Assessment in collaboration with the Council's public Health Team.

The Health Impact Assessment of the Submission Local Plan resulted in a raft of policies being revised, new guidance being drafted and a proposed new policy that requires developers of all major developments to undertake their own HIA pre-application.

The health and wellbeing implications of the proposed Main Modifications have been assessed through an updated Health Impact Assessment which forms one of the evidence base documents that will be subject to further consultation.

The recommended changes to the SCI take account of the latest planning and social distancing guidance from the Government and reflect the continuing importance of maintaining public health and safety during the Covid 19 pandemic.

BACKGROUND PAPERS

None.