



For the attention of Ms Susan Heywood

Date August 1 2019

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Dear Ms Heywood

Havering Local Plan Examination – Response from London Borough of Havering to questions from the Inspector and ‘follow-on’ actions from the Examination in Public hearing sessions on 29th May and 30th May 2019

I am writing to you to confirm the information we are submitting following the Examination in Public (EIP) sessions held on 29th and 30th May and your own subsequent notes to the Council dated 14th June 2019.

In order to address the outstanding matters from the May Examination hearings, this response deals with :

- Draft Proposed Main Modifications schedule
- Update on Parking – Policy 24
- Update on Gypsy and Traveller matters including further revisions to Policy 11
- Other matters (including Upminster Miniature Golf Course and Site Specific Allocations)

Draft Proposed Main Modifications schedule

As per your note dated 14th June 2019 setting out possible Main Modifications that may be required, we have submitted the modification table incorporating the suggested modifications you have at present directed us to make. The table includes suggested reasons for the ‘PM’ modifications.

Older People Accommodation Review

An updated version of the Older People Review (2018) document which relates to modifications suggested for Policy 6 Specialist accommodation is submitted.

Parking

We have submitted a modification for Policy 24 including modifications suggested by Transport for London as per your instruction.

For the avoidance of any doubt, the Council's clear position remains that it wishes the adopted Local Plan to include the modified Policy 24 it provided in March 2019 as this better reflects the need for parking to be provided in areas that Transport for London characterises as having higher public transport accessibility such as Romford Town Centre.

Havering Council robustly maintains its stance on applying minimum residential parking standards for the most accessible parts of the borough such as Romford. A key reason for this is that Table 6.2 car parking standards in the current London Plan states that the most accessible parts of the boroughs (PTAL's 5 and 6) have a parking provision standard of "up to one space per unit".

Havering remains firmly of the view that a parking standard of 0.5 spaces per unit is within this parking standard and also reflects the further comment on the London Plan that "all developments in areas of good public transport accessibility (in all parts of London) "should aim for significantly less than 1 space per unit".

A parking standard of 0.5 spaces per unit is considered to be well within these parameters.

Gypsy and Travellers

In terms of the sites that have been identified for allocation as Gypsy and Traveller sites, you required further information on the deliverability of these sites to demonstrate that the identified number of pitches can be reasonably accommodated on the identified site areas in the proposed allocations.

Additional work has been undertaken :

- to address the issues raised at the EIP by the families at the Haunted House Wood site
- to show layout information and how pitches/additional accommodation units can be fitted on the current land occupied by the traveller households identified by the red line boundaries presented as part of the Hearing information or where appropriate, land beyond these current site boundaries that the households have access to (which has been verified by review of Land Registry records),

- to show how the extra pitches required on sites that will not be allocated in Policy 11 can be accommodated on other existing sites
- in line with Government policy, show how the accommodation need for gypsy and traveller households (meeting the planning definition) for years 6-15 of the plan
- period could be accommodated and provide information on broad areas where future expansion may take place
- to further revise Policy 11 Gypsy and traveller accommodation to support the above work

Whilst there are no national standards for the layouts of Gypsy and Traveller sites the indicative site layouts have been undertaken using advice laid out in the 'Designing Gypsy and Traveller Sites Good Practice Guide (2008) and 'Designing Gypsy and Traveller Sites' Welsh Government Guidance (2015) Additionally, larger unit sizes have been plotted on sites than might be required by the households in order to maximise living accommodation. Where there is an approved plan for the site these have been used as the basis of then adding any additional required pitches. The layouts are indicative only and will not be used for any planning purpose.

As discussed with the families at the EIP sessions, it is clear that they would rather stay together on their site to better maintain family cohesion and use smaller accommodation units and day rooms if necessary than have to seek alternative provision on other sites and split the family group.

It is proposed that these sites will be allocated in the Local Plan along with the number of pitches for each site.

Landowners/occupiers will still need satisfy the criteria in Policy 11 and secure planning permission. If planning permission is granted they will also need to obtain a site licence.

The site investigation work has shown that for the sites that are going to be allocated can accommodate their 5 year need and the 6-15 year need for those who meet the definition can be met within current site boundaries.

A total of 7 pitches on two sites are not being allocated (Land east of Rosewood Cottage (5 pitches) and Willoughby Drive (2 pitches) and these pitches could be accommodated on other sites.

We are submitting site layout plans and an Excel sheet showing site capacity for you to review.

Also submitted is an updated GTAA dated July 2019. A revised Policy 11 is included in the modifications table.

The Council considers that this further work addresses the outstanding issues and provides a reasonable, robust and proportionate response.

Other matters

The Council has already addressed the queries you raised on housing at the EIP. It has responded separately to the questions that you raised about the Upminster Miniature Golf Course proposals (my e-mail to the Programme Officer on July 24 2019 refers).

The Council hopes that this information addresses the outstanding issues from the EIP and enables you to confirm your position regarding forthcoming consultation on proposed modifications.

This letter and its attachments will be added to the Local Plan pages of the Council's website (as previously).

Yours sincerely,

Martyn Thomas

Head of Spatial Planning