

LONDON BOROUGH OF REDBRIDGE
Examination of Redbridge Local Plan 2015-2030

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PRELIMINARY MATTERS FOR THE COUNCIL

The following matters have arisen from my preliminary appraisal of the Redbridge Local Plan and the supporting material, including the evidence base. They are of a general nature but all relate to soundness and/or legal compliance and so could potentially require modifications to be proposed. I am raising them at an early stage in order to assist the progress of the examination.

I will shortly be setting out separately the issues and questions that I wish to address through the examination which, if necessary, will be considered at the hearings sessions. These can be covered in statements prior to the hearings. I will also be providing a guidance note and a hearing programme in due course.

A brief but complete reply from the Council to each question posed would be appreciated and should be sent to the Programme Officer (PO) by **Thursday 13 April 2017**. If anything is not clear or if further explanation is required of what I am asking then please contact me via the PO.

Housing White Paper – The Government published the Housing White Paper entitled *Fixing Our Broken Housing Market* on 7 February 2017. [Fixing our broken housing market - GOV.UK](#) Do the proposals in the White Paper have any implications for the Local Plan? If so, what steps (if any) does the Council intend to take?

Brexit – Has the Council considered and does it wish to comment about any implications arising from Brexit?

Development Opportunity Sites – Appendix 1 contains a schedule of Development Opportunity Sites. Is the Local Plan seeking to allocate these sites to promote development and flexible use of land in accordance with paragraph 157 of the National Planning Policy Framework? If so, is this sufficiently clear and is there sufficient detail on form, scale, access and quantum having regard to paragraphs 002 and 010 of the Planning Practice Guidance on *Local Plans*? Where more than one proposed use is referred to how is the mix of uses on each site to be settled? Is it necessary to include sites with a capacity of less than 10 dwellings?

Furthermore, the schedule of modifications to Appendix 1 (LBR 1.01.3) deletes some sites and adds others. These changes would be likely to be the subject of Main Modifications on the basis that they are required for soundness. Can the Council briefly explain the rationale for these proposed changes for each site? In addition, the indicative development capacity has also been adjusted for a number of sites. Can the Council also explain the reason for this for each individual site? This might usefully be done by creating an expanded version of

the modified Appendix 1 schedule including a further column to explain the reason for the inclusion or deletion and the change in capacity.

Conformity with the London Plan - The provisions of section 24 of the 2004 Act require the submitted documents to be in general conformity with The London Plan and for an opinion on general conformity to be requested of the Mayor of London. The legal compliance checklist (LBR 1.20) confirms that this has been done but could the Council publish any response once it has been received?

Habitats Regulations Assessment - The conclusions of the Habitats Regulation Assessment of February 2017 (LBR 1.12) at section 6 makes reference to the involvement of Natural England (NE). However, the Regulation 19 consultation from NE (R01097) says that it does not wish to comment. The Council should approach NE directly to ascertain their views on the latest HRA and particularly in relation to the findings regarding the Epping Forest SAC. Any reply should be published. NE should also be asked to confirm that any response given has taken account of the recent Court judgment in *Wealden District Council v SSCLG and others* [2017] EWHC 351 (Admin).

Crossrail - In response to representations R01100/03 the Council observes, amongst other things, that Crossrail will increase the overall capacity by about 70% per train. What is the source of this statement? What are the predicted impacts of Crossrail for public transport accessibility across the Borough? What are the implications expected to be for the Central Line where issues of overcrowding appear to be acknowledged in paragraph 1.21.4 of the Local Plan? What is the latest about the likely commencement date of the service?

Objectively assessed need - The note on page 17 of the North East London Strategic Housing Market Assessment (SHMA) (LPR 2.01) indicates that the GLA has published further population and household projections. Has the Council had the opportunity to assess the implications of these and is it intending to update the findings of the SHMA? Furthermore, does the publication by ONS and DCLG of the 2014-based population and household projections on 26 May 2016 and 12 July 2016 make any material difference to the findings of the SHMA?

Paragraph 3.2.11 of the Mayor of London's SPG notes that housing market areas can also overlap regional boundaries as boroughs in outer London often have strong market links with those in other regions. In the light of this is the Council satisfied that the defined housing market areas in the SHMA should exclude reference to Epping Forest District?

There is an expectation in the London Plan that boroughs should contribute to meeting their own needs and also needs arising in London as a whole. In preparing the Local Plan and before proposing to release Green Belt land should the Council have investigated whether other boroughs within the housing market area were able to contribute in this way?

Thames Water - Paragraph 18.7 of the Infrastructure Delivery Plan (LBR 2.21) indicates that there is limited capacity within the existing sewers although no works were planned as of December 2015. The Council should approach Thames Water again for an update. Whilst it is intended that any upgrades required will be provided prior to any occupation is Thames Water satisfied that

capacity issues and/or funding will not be an impediment to the deliverability of development in the Local Plan?

Statements of Common Ground – The Council’s letter of 3 March indicates that statements of common ground are being prepared with a number of representors. There is no requirement for these to be undertaken but if they would assist the examination they should be published once they are completed.

Regulation 8 (5) of the 2012 Regulations – This provides that where a local plan contains a policy that is intended to supersede another policy in the adopted development plan, it must state that fact and identify the superseded policy. I assume that the existing Core Strategy and Borough Wide Primary Policies of 2008 is to be replaced. If so, the Local Plan should confirm this and contain a schedule of superseded policies to accord with the Regulation. This can be progressed by means of a further proposed modification.

David Smith

INSPECTOR

28 March 2017