

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

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HEARING AGENDA – DAY 2 – Wednesday 7 June 2017

Housing and exceptional circumstances in the Green Belt

10am at City Gates Conference Centre, 3rd Floor Conference Room 25-29
Clements Road, Ilford, IG1 1BH

The hearing agenda reflects the issues and questions previously identified. However, some questions may have been omitted if there is no need for discussion based on the written statements submitted. The agenda is also subject to change and adjustment.

Issued on 30 May 2017

Issue 5:

Are the policies for housing growth and affordable housing (Policies LP2 & LP3) justified, deliverable and consistent with national policy?

Housing growth

- i) Has the Council done all it can, in co-operation with other Boroughs and Districts, to identify previously-developed land, including that in neighbouring authorities including Epping Forest District, before releasing Green Belt land for development?
- ii) Should housing need be assessed on a London-wide basis or within the Outer North East London housing market area?
- iii) Is the minimum housing target of 16,845 justified having regard to the aim in The London Plan to “close the gap” to objectively assessed need and the expectation that 18,774 dwellings will be delivered during the plan period?
- iv) What is the justification for the inclusion of an allowance of 2,700 dwellings from windfall sites given that paragraph 5.16 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that dependence on windfall capacity should be minimised?
- v) Will the Local Plan provide a 5 year supply of deliverable sites with an appropriate buffer in accordance with paragraph 47 of the National Planning Policy Framework? Is this on track for the first phase of the Plan from 2015-2020? How is any shortfall in delivery over that period to be addressed? Will the policies in the Local Plan ensure the on-going availability of a 5 year supply?

- vi) Having regard to the SRQ matrix in The London Plan (Table 3.2) has the Council made reasonable assumptions about densities that can reasonably be achieved at opportunity sites given that paragraph 3.84 of the London Strategic Housing Land Availability Assessment (LBR 2.05) indicates that outer London Boroughs may have to encourage higher density development to help meet their pressing needs?
- vii) Are the assumptions and analysis in Appendix 1 of the Development Opportunity Sites Review (LBR 2.06) reasonable and realistic? Is this assessment sufficiently comprehensive?
- viii) Are the sites relied upon for the supply of housing deliverable and developable in accordance with paragraph 47 of the National Planning Policy Framework?
- ix) Will the 2km buffer zone around the Epping Forest SAC affect the deliverability of developments within that area? What mitigation measures are likely to be possible?
- x) Is there sufficient flexibility within the allocations to accommodate unexpected delays whilst maintaining an adequate supply?
- xi) How would the supply of housing sites be monitored and managed? Does the Local Plan contain a housing implementation strategy?

Affordable housing

- xii) What is the rationale for the proposed minimum strategic affordable housing target of 35%? Does this respond adequately to the objectively assessed need for affordable housing, the Viability Assessment (LBR 2.11), The London Plan and the aspirations of the Mayor of London?
- xiii) Is the reference in Policy LP3 to schemes of 10 units or more justified?
- xiv) What is the reason for including reference to the capacity of a site in Policy LP3? How is this to be assessed?
- xv) Has the Council considered increasing the total housing figures in order to help deliver the required number of affordable homes in accordance with the PPG (ID 2a-029-20140306)?
- xvi) Does the Local Plan adequately address the needs for all types of housing (excluding affordable housing) and the needs of different groups in the community as set out in paragraph 159 of the National Planning Policy Framework?

Issue 6:

Are there exceptional circumstances that warrant altering Green Belt boundaries?

- (i) Having regard to the NPPF, the housing targets in The London Plan, the policy approach of supporting growth without encroaching on the Green Belt, the identification of Green Belt in the London SHLA as a policy constraint (paragraph 2.40 of LBR 2.05) and the objectively assessed need

for housing in the Borough should Green Belt sites be released for development as a matter of principle?

- (ii) Did the SHLA identify Green Belt sites as having "significant housing capacity" as indicated at paragraph 4.8 of the Spatial Strategy Topic Paper (LBR 1.04)?
- (iii) Paragraph 4.31 of the Spatial Strategy Topic Paper (LBR 1.04) observes that without the release of Green Belt sites the Council would not be able to meet its infrastructure needs. What weight should be given to this consideration in determining whether exceptional circumstances exist?
- (iv) Is the methodology within the Green Belt Review Addendum (LBR 2.41.1) and the previous reviews robust and are its conclusions logical? In particular, is the interpretation of what is meant by "town" and "countryside" in this context reasonable? Have these terms been applied consistently?
- (v) What would be the impact of the proposed housing sites on the Green Belt in terms of its aims and purposes?
- (vi) To what extent should the provisions of paragraph 81 of the NPPF regarding planning positively to enhance the beneficial use of the Green Belt be taken into account?
- (vii) Are there any sites where land has been included in the Green Belt which it is unnecessary to keep permanently open?
- (viii) Are the proposed minor boundary changes and additions to the Green Belt justified by exceptional circumstances?
- (ix) Is the Council satisfied that the Green Belt boundaries will not need to be altered at the end of the development plan period?
- (x) Have the proposed boundaries been defined clearly, using physical features that are readily recognisable and likely to be permanent?

Participants

Mr P Scott

Mr K Page – London Green Belt Council

Ms R Bodiam – Blake Associates for Todcharm Ltd

Ms M Sharma/Ms I Biswas-King – NOISE

Ms B Stolper/Mr K Reid/Ms J Peters/Mr J Wachter - GLA

Ms S Powell

Mr V Bartlett

Mr J Honey/Ms C Simpson - AECOM for East Thames

Ms A Roberts CPRE

Ms H Donnelly – DNS for Guide Dogs for the Blind Association

Ms W Taylor

Ms J McArthur – Icen Projects for Ford Motor Company

Mr Lampard – Lichfields for Crest Nicholson

Ms P Juggins/Ms H Blunstone – CBRE for The Anderson Group

Mr C Gannaway