

Potential existence of spare capacity for development within the Outer North East London SHMA area

In response to discussions at the Local Plan hearing sessions, and the Inspector's letter dated 27th June 2017 (para 12), the Council has sought further clarification from its neighbouring boroughs within the Outer North East London Housing Market Area on whether there might be surplus land available for development within the areas of those authorities.

Appendix 1 of the Council's Duty to Cooperate Statement (LBR 1.14) sets out the position in relation to the neighbouring boroughs of Barking and Dagenham, Newham and Havering being able to meet their objectively assessed need. However, it doesn't provide an indication of how this relates to the London Plan housing target or whether there might be surplus land available for development within the areas of those authorities.

As set out in the Council's hearing statement in response to Issue 5, question (i) (CED012), all reasonable opportunities for development on previously developed land have been taken forward by neighbouring boroughs and Districts through the development of their Local Plans, prepared in conformity with the NPPF.

Notwithstanding the above, and to provide the Inspector with the most up-to-date position, the Council has sought clarification from Barking and Dagenham, Newham and Havering on whether they can meet and exceed their respective London Plan housing targets, and whether there is the potential existence of spare capacity for development within these boroughs.

The latest position, as of 28th July 2017, is set out below:

Barking and Dagenham

The borough will approach housing delivery in two distinct ways:

- as a minimum, and in alignment with the London wider approach we will seek to deliver our boroughs proportion of supply as set out within London Plan housing targets;
- Secondly, the Council's Housing Land Assessment, (which provides a robust account of future housing capacity) has identified a housing capacity over the emerging plan period (2018 to 2033) of 36,535 homes. We will seek to meet this over the plan period.

The Housing Land Assessment has also identified land supply of 54,500 homes (rounded) (excluding windfall). This level of supply means the Council has sufficient land supply to

meet our borough's housing need requirements as set out in the (sub regional) Outer London Strategic Housing Market Assessment (SHMA). Additionally, the Greater London Authority Housing Supplementary Planning Document sets London boroughs the objective to exceed minimum targets as part of closing the Greater London supply/need gap – not limited to neighbouring boroughs or identified sub regional housing markets. Therefore, our borough's surplus housing land will have contributed to strategic need at the London level.

Newham

In accordance with the London wide approach to housing delivery, the London Borough of Newham is seeking to deliver (as a minimum) its proportion of housing supply set out within the London Plan, a target arrived at through assessment of housing requirements and land availability across the capital, within London's unique planning context, taking into account constrained land supply and growing housing need.

The Council are currently able to meet our capacity derived housing target, largely through the development of a number of identified strategic brownfield sites, as set out in our most recent [5 Year Land Supply Update \(August 2016\)](#). Given the objective to exceed minimum targets as part of closing the London-wide gap between need and supply - not limited to neighbouring boroughs or identified sub-regional HMAs - all developable brownfield opportunities are being relied upon to meet and exceed London Plan targets, in turn contributing to both local and strategic need.

Moving forward, the London Borough of Newham are in the process of reviewing the Local Plan and will be continuing to engage with neighbouring boroughs and the GLA on a number of matters, including in relation to housing delivery (noting the emerging London wide SHLAA and SHMA studies).

Havering

In accordance with the London wide approach to housing delivery (and as set out in the Proposed Submission Local Plan that will be considered by Cabinet during the week commencing 17th July), the London Borough of Havering is seeking to deliver (as a minimum) its London Plan housing target.

Through the preparation of the Local Plan, Havering has sought to identify additional capacity in order to close the gap between the London Plan Housing Target and the OAN as established in the Outer North East London SHMA. However, we have been unable to identify any significant additional capacity and therefore will be unable to meet our own OAN. In light of this, Havering will be unable to meet any unmet need from Redbridge (or other London Boroughs).

Based on Havering's engagement with the GLA, the Council agrees that:

- London should be treated as a single housing market;
- each London borough should seek to exceed its minimum housing target to close the gap between housing need and supply;
- there is no requirement for neighbouring authorities to accommodate surplus housing need from adjoining boroughs.

Conclusion

The neighbouring boroughs within the Outer North East London housing market area are able to meet their London Plan targets and are relying on all brownfield land to do so.

Given London's unique planning context, the GLA has clarified that London should be treated as a single housing market. In order to meet local need and contribute to meeting strategic need each London borough should seek to exceed its minimum housing target by measures set out in London Plan Policy 3.3E, paragraphs 3.19 and 3.19i of the Plan and Section 1 of the Housing SPG. It is clear from the above position that the neighbouring boroughs are doing this, in turn contributing to both local and strategic (Redbridge) need.