

# Redbridge Local Plan Authority Monitoring Report 2020-21

June 2022



Planning & Building Control



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## **Executive Summary**

During the 2020/21 monitoring period, the Council has made progress in many areas in particular with Development Management and Planning Enforcement. Development Management saw the continuation of high performance in determining major and minor planning applications and exceeding targets. The Council has also continued work in delivering affordable housing; progressed a partnership with Spacehive online crowdfunding platform to support local community projects utilising Neighbourhood Community Infrastructure Levy funding (NCIL); and made further progress on the corporate climate change strategy.

As reported in the 2019/20 AMR Report document the Council reviewed its approach to planning enforcement. This meant moving away from a negotiated agreement approach to one directly tied to the statutory timescales for action, which had an immediate impact in improving outcomes. The number of enforcement notices issued as reported last year for 2019/20 was 52, the number for 2020/21 is much the same at 50 – both numbers are an improvement compared to 30 served in 2018/19 under the negotiated agreement approach. Redbridge was also placed 5<sup>th</sup> in the country for serving contravention notices, with 108 served during the latest reporting period.

The Council launched its Community Crowdfunding programme with Spacehive<sup>1</sup> in November 2020 to help deliver funding from the Neighbourhood Community Infrastructure Levy (NCIL). There were two funding rounds in the spring and autumn of 2021 that funded six key projects. The two rounds were also successful in improving community outreach for Redbridge Council and significantly increasing community participation. Projects involved hours of voluntary work, increased local community involvement in NCIL funding programmes, and involved many Redbridge schools and colleges, reached many thousands of members of the public on social media, and supported projects with over £18,000 in NCIL funding.

The planning service has also transformed into a modern, technologically enabled, efficient and cost-effective service. Due to these and other improvements it was recognised nationally as Planning Service of the Year in 2020 and crowned Best Planning Service at the National Planning Awards (2020/21); it won the Redbridge Staff awards for 2021, winning the Changemaker Team Category; and it became winner for Best Planning Service in London at the Royal Town Planning Institute (RTPI) Awards (2021/22). This is a tremendous achievement and shows the level of positive change happening in the service area.

Despite these and other successes there remains some key challenges - Redbridge has not delivered its annual housing target since 2006/07. The borough faces a continued challenge with housing delivery and in 2020/21 Redbridge only met 46% of its annual housing target and could not demonstrate a 5-year housing land supply. This means that Redbridge remains in Presumption in Favour of Sustainable Development after failing the Housing Delivery Test in 2021. In addition, the Housing Delivery Test results mean that even if a 5-year housing land supply was maintained, the Presumption would still apply until delivery significantly improved.

Fundamentally, the Presumption will greatly reduce the Council's ability to drive forward a clear vision for good growth and sustainable development. It will be increasingly difficult to work with local communities to deliver the type of housing developments that meet their needs and deliver the vision of 'Growing Redbridge Together' and the other key recommendations from the recently completed Growth Commission's work.

<sup>&</sup>lt;sup>1</sup> Spacehive is a funding platform for ideas that bring local places to life. Projects can include improvements to community facilities such as parks or playgrounds, as well as starting a street market.



# Section 1 Introduction - About the Authority Monitoring Report (AMR)

#### 1.1 What is the Authority Monitoring Report?

- 1.2 The Council is required by section 35 of the Planning and Compulsory Purchase Act 2004, as amended by section 113 of the Localism Act 2011, to prepare an annual report providing information on the implementation of the Local Development Scheme (LDS). This sets the timetable for the preparation of future Local Plan documents. The AMR is also used to assess the performance and effectiveness of Redbridge Council's planning policies in delivering the key objectives of the Local Plan as well as wider corporate objectives.
- 1.3 Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the detail that the Authority Monitoring Report (AMR) must contain.

#### 1.4 What is being monitored?

1.5 The monitoring period for this AMR is between 1 April 2020 to 31 March 2021. It provides information and data related to indicators in the monitoring framework set out in appendix 3 of the Redbridge Local Plan (2015-2030). This AMR is reporting on 56 indicators from the Redbridge Local Plan 2015-2030 (where reliable data is available). Most of the data for each indicator has been included, but the report highlights data that has been difficult to obtain or is too unreliable to include.

#### 1.6 Local Development Scheme

- 1.7 All local planning authorities (LPA) are required to have a Local Development Scheme (LDS). The Council's current LDS (2019-2022) provides a schedule for individual planning guidance that the Council proposes to prepare, and a summary of progress is provided for each document.
- 1.8 Redbridge Local Plan 2015-2030
- 1.9 The Local Plan was adopted at a meeting of the Full Council on 15th March 2018. It replaced the existing Core Strategy, Borough Wide Primary Policies, and Area Action Plans.
- **1.10** Housing Design Guide Supplementary Planning Document (SPD)
- 1.11 A Housing Design Guide SPD was adopted by the Council in September 2019. It supersedes the previous Householder Design Guide SPD (2012) and reflects more recent guidance and Redbridge Local Plan policies. It helps householders considering extensions or other domestic alterations, as well as small and medium size developers seeking to convert properties or develop housing schemes on small sites.
- 1.12 The SPD covers all types of housing development, apart from major development schemes, offering guidance on what development proposals the Council considers acceptable and what it does not. The SPD also provides information on permitted development (PD), building regulations, extensions, roof alterations and other



domestic development; basement development; design and housing standards for conversions and houses of multiple occupation (HMOs), and more.

- 1.13 Article 4 Directions
- 1.14 In November 2020 the Council served an immediate article 4 direction in Aldersbrook and Lake House Conservation Area to remove permitted development rights threatening the character of the area. The Article 4 Direction was confirmed by the Council in March 2021.
- 1.15 In January 2021 Article 4 Directions were also served on Hainault Business Park to protect employment uses, which was confirmed by Cabinet in May 2021. However, due to changes in the General Permitted Development Order (GPDO) and the use classes order in July 2021 these Article 4 Directions became superseded and needed to be replaced after 31 July 2022.
- 1.16 The council's Planning Policy Team reacted to these changes by serving a further replacement Article Direction in November 2021, which was confirmed by the council in April 2022. This was supported by the Secretary of State the following month in May 2022, stating that the new Article 4 Direction is in line with national policy and is therefore justified. The new Article 4 Direction protects employment uses at Hainault Business Park from potentially harmful permitted development that can threaten employment in the second largest employment area in the borough, after Ilford Metropolitan Town Centre.

#### 1.17 Neighbourhood Planning

1.18 The 2011 Localism Act introduced neighbourhood planning as a right for communities to shape and have more influence and control over their local area, to ensure they get the right type of development for their area. Neighbourhood Plans are led and produced by an authorised local community organisation such as a designated Neighbourhood Forum, and are subject to consultation, examination, and a referendum. Once adopted they form part of the statutory development plan and must be in general conformity with the Redbridge Local Plan and London Plan. The South Woodford Society's application for Neighbourhood Area and Forum designation was approved by Cabinet in 2020. The Council will provide support and advice to any group who express an interest in Neighbourhood Planning.

#### 1.19 Partnership Working and Duty to Cooperate

- 1.20 Section 110 of the Localism Act requires co-operation between local authorities, county councils and a range of other bodies as integral to the preparation of planning policy. The Localism Act defines strategic matters as, '...sustainable development or use of land that has or would have a significant impact on at least two planning areas, including sustainable development or... infrastructure that has... a significant impact on at least two planning areas'.
- 1.21 The Council has actively engaged neighbouring authorities and relevant bodies over the monitoring period, on their own Local Plans as well as on topics requiring strategic cooperation including Epping Forest Special Area of Conservation (SAC). A key mechanism for this cooperation is the Association of London Borough Planning Officers (ALBPO), through which the Council has engaged other boroughs on areas of common concern including the draft London Plan.



## Section 2: Theme 1 - Promoting and Managing Growth (Local Plan Policies LP1-LP17)

#### 2.1 Strategic Objective 1

- 2.2 The theme of Promoting and Managing Growth is the first of four Strategic Objectives set out in the Redbridge Local Plan (2018) and involves the implementation of Local Plan policies LP1-LP17, focused on housing, employment, and commercial uses. The aim of Strategic Objective 1 is to harness growth and achieve sustainable patterns of development in the borough's Investment and Growth Areas (Ilford, Barkingside, Crossrail Corridor, Gants Hill, and South Woodford).
- 2.3 The current Redbridge Local Plan's key objective is to deliver up to 17,237 new homes for the Plan period up to 2030, to meet housing needs and ensure diversity of housing types and affordable housing by delivering the annual housing target of 1,123 new homes. However, the new London Plan (2021) has set a new housing target for the borough of 1,409 new homes per annum, with a 10 year target of 14,090 new homes (between 2019/20-2028/29).
- 2.4 Growth should respect the character of built heritage and neighbourhoods in the borough and help improve the health and wellbeing of Redbridge's population through good spatial planning.
- 2.5 Further aims are to increase the capacity and quality of Strategic Industrial Locations (SIL) and encourage investors to maximise employment opportunities in the borough; maintain an appropriate mix of town centre uses in Ilford Metropolitan Town Centre, the District Centres, and local Neighbourhood Parades; and ensure that employment opportunities are accessible to all.

# 2.6 Performance of Indicators and targets for housing, employment, and commercial uses.

#### 2.7 Housing Delivery Indicators

2.8 The housing delivery indicators aim to monitor how the borough is performing in delivering housing and bridging the gap between targets and need.

Housing Indicator 1: net additional dwellings for the current year 2020-2021- delivering a minimum of 1,123 new dwellings per year.

- 2.9 Fig.1 below shows that 515 additional dwellings were completed during 2020-2021, only around 46% of the target for that year, and around a 17% decrease in delivery from the 624 dwellings delivered in 2019-2020. Over the previous three financial years between 2018-21 Redbridge delivered just 56% of its housing delivery target. Redbridge is also unable to demonstrate a 5 Year Housing Land Supply and continues to be subject to a 'Presumption in Favour of Sustainable Development' (the Presumption) in relation to the determination of planning applications for new housing.
- 2.10 The Presumption means that when determining housing planning applications, housing policies in the Local Plan are considered out of date and only limited



weight can be applied to them. Although planning permissions increased during 2020/21, due to the time lag between planning permission and completion, this did not have an impact on delivery.



Fig.1: Net additional dwellings 2020/21

Housing Indicator 2: net additional dwellings over the previous five-year period or since the start of the relevant Local Plan period, whichever is the longer.

2.11 See fig.2 below, the number of net additional dwellings delivered in Redbridge for the previous 5-years between 2016 and 2021 (the period from the start of the Redbridge Local Plan) is 3,292 completions. This figure represents approximately 59% of the overall minimum housing delivery target for that 5-year period (5,615 dwellings), based on the annual housing target of 1,123 dwelling completions per year. The shortfall in delivery for the same period is 2,323 dwellings. This has stayed relatively static since the 2019-20 AMR.

Fig. 2: Housing completions 2016-21



Housing completions delivered 2016-2021



Housing Indicator 3: Projected net additional dwellings up to the end of the relevant Local Plan period or over a ten-year period from its adoption, whichever is the longer.

2.12 The projected number of additional dwellings up to the **end of the Local Plan period is 19,319.** This is for the period from 2020/21 to 2029/30 and is based on the 5-year housing land supply from 2020 to 2025, yearly housing projections based on the housing pipeline, and windfall projections until the end of the adopted Local Plan period. See fig 3 below. Fig 4 shows the next 10 year projections for 2022-2032, which is **20,851**.

Fig. 3: Housing projections for the end of the Plan period





#### Fig 4: The next 10-year housing projections

Housing Projections 2020-2030



Housing Indicator 4: The annual net additional dwelling requirement.

- 2.13 The minimum annual net additional requirement or housing target for Redbridge during the 2020/21 period was 1,123 dwellings per year. This has been the regional target since 2015 when it increased from 760 dwellings per year. As shown in figure 5 below this target has not been met in the borough since it first became effective in 2015 at the start of the Local Plan period.
- 2.14 A new target of 14,090 net additional dwellings over a 10 year period was introduced in the London Plan in March 2021 and equates to a new annual requirement of **1,409** dwellings per year.



Fig. 5: Housing delivery for the previous 5 year period

Housing delivery 2016-2021

Housing Indicator 5: Annual average number of net additional dwellings needed to meet overall housing requirements, having regard to the previous year's performances.

2.15 Because of the low performance in the years since the start of the Plan period (2015-2020), to make up for the shortfall in delivery Redbridge would need to deliver an approximate average of 1,619 dwelling completions per year for the remaining 10-year Local Plan period (2021/22-2029/30). This figure is based on the new 10-year London Plan target of 1,409 new dwellings each year, plus an additional 210 new homes each year to make up for low performance of previous year's shortfall. The total number for the 10-year period is spread equally year on year throughout the length of the remaining Plan period.



Housing Indicator 6: Number of non-commenced dwelling approvals.

2.16 The number of planning permissions for dwellings **that have not been commenced during the financial year for 2019/20 is approximately 2,500**. This is greater than the number of completions for the same period (515) which is about five times the number of completions delivered. This indicator points to housing development with permission not being started early enough by developers.

Fig. 6: Number of non-commenced dwelling approvals



Housing Indicator 7: Number of dwelling units under construction.

2.17 During the financial year for 2020-2021 **904 new dwellings were under construction**, including homes commenced during that year and in previous years. This is higher than the number of homes that were actually delivered (515) during the same period.

Housing Indicator 8: Number of dwelling units started.

2.18 For the financial year 2020/21 the **number of dwelling units started is 182**. The number of commencements is low in part because the number of dwellings granted permission in Redbridge has been low in previous years (whilst 1,645 dwellings were approved in 2020/21, only 660 were approved in 2019/20). This low rate of starts clearly has a negative impact on build out rates (completions) which is also very low at just 515 for 2020/21, around 46% of the annual housing delivery target for the period. Fig 7 demonstrates the position.







# Number of dwelling units under construction 2020/21

Housing Indicator 9: Number of Affordable housing completions in all new developments.

Target: Delivering at least 35% or 393 new affordable homes per year.

- 2.19 The number of affordable housing completions in all new development for 2020/21 is **39**. This figure represents 7% of the total number of housing completions (515), but only 3% of the annual target of 1,123 dwellings per year. 393 new affordable homes per year is sought in Redbridge Local Plan Policy LP3 'Affordable Housing', which is 35% of the annual target.
- 2.20 Table 1 below shows the performance in affordable housing delivery for 2020/21. The number of completions for the period is small partly because housing delivered through permitted development rights (such as office to residential change of use) and schemes under 10 dwellings, do not provide affordable housing.

Type of scheme	Dwelling completions 20/21	Affordable completions	Affordable %
10+ units	263	36	14%
1-9 units	121	3	3%

#### Table 1: affordable housing delivery 2020/21



London Borough of

#### Fig. 8: M4(2) and M4(3) dwellings for new build



Number of accessible (M4(2)) and wheelchair accessible (M4(3)) dwellings delivered within new build 2020/21

- 2.21 The figures for accessible and wheelchair accessible homes for **new dwellings** and **overall dwellings** is low partly because some planning permissions do not require accessible standards, such as prior approvals, and schemes of under 10 units do not yield M4(3) units.
- 2.22 The overall figure for M4(2) accessible dwellings delivered in **new dwellings** (187 new dwellings delivered in 2020/21), at 147 is lower than the figure for 2019/20 (221). The overall percentage of delivery of M4(2) dwellings in new build is fairly high at 79%, although not quite as high as the Local Plan target of 90% (approx. 168 out of 187 new builds). In terms of M4(3) dwellings delivered in new build dwellings, again the number delivered (12) does not quite reach the level required of 10%, reaching only 6.4%.
- 2.23 These figures do show that **new build dwellings** are not far off required percentages for M4(2) and M4(3) accessible dwellings as outlined in Local Plan policy.



2.24 However, when compared to **overall completions**, or **overall housing delivery**, which is 515 dwellings, the delivery of M4(2) and M4(3) accessible dwellings in terms of percentages looks smaller – with 21% M4(2) accessible dwellings delivered, and 2.33% of M4(3) accessible dwellings delivered in **new dwellings**. The overall figures also do not compare well, with 147 M4(2) accessible dwellings amounting to just 29% of overall dwellings delivered, and 12 M4(3) accessible dwellings delivered.

Fig. 9: M4(2) and M4(3) dwellings for overall



Number of accessible (M4(2)) and wheelchair accessible (M4(3)) dwellings delivered in overall completions 2020/21

**Housing Indicator 12: Number of dwelling conversions.** Target: Resisting the loss of larger family sized housing in the boroughs housing stock.

**Housing Indicator 13: Number of new Buildings in Multiple Occupation.** Target: Resisting the loss of larger family sized housing in the boroughs housing stock.

2.25 The number of dwelling conversions to flats completed for the 2020/21 period was 1, however this excludes 16 certificates of lawfulness for historic pre-existing flat conversions which were granted during this period. Policy LP6 provides criteria that must be met, and which have the effect of restricting opportunities for new flat conversions.



- 2.26 With regard to houses in multiple occupation (HMOs) a total of 67 planning applications were decided within the 2020/21 period. Of these:
  - 24 were certificates of lawfulness for existing HMOs -
    - 23 of these were small HMOs in the C4 use class
    - 14 were unlawful and 10 were lawful
    - 1 was a discharge of conditions application for a previously approved large HMO.
  - 40 were full planning applications
    - o 2 were for the loss of an HMO to other uses
    - The remainder involved the conversion of a building (usually a residential dwelling) to an HMO, or the enlargement of an existing HMO
    - Overall, 2 applications were withdrawn, 25 were refused, and 13 approved.
  - 2 were certificates of lawfulness (proposed) for new small HMOs. Both were 'unlawful', as the Article 4 Direction means that they require a full planning application

Housing Indicator 14: Dwelling completions by tenure and number of bedrooms. Target: affordable tenure split - 60% social rented/affordable rented and 40% Intermediate. At least 50% of housing completions to have 3 or more bedrooms.

2.27 Of the 490 dwellings (gross figure) with available information completed during the period for 2020/21, they can be broken down as follows:

Type of scheme	Studio	1 bed	2 bed	3 bed	4 bed plus
Social/affordable rent	-	4	34	7	-
Private	70	222	96	43	14
Totals	70	226	130	50	14

Table 2: Dwelling completions

2.28 45 of the homes delivered (9%) were affordable. The remaining 445 were private homes. 100% of the affordable homes delivered were social rent or London Affordable Rent; with no intermediate homes delivered. This division is not in line with the 60%/40% split in favour of social/affordable rent as required in the Local Plan. Only 13% of all the housing completions contained 3 or more bedrooms, well short of the 50% target for the borough.



Fig. 10: Dwelling completions by tenure



Dwelling completions by tenure and number of bedrooms 2020/21

previously developed land.

- 2.29 Of the 490 dwellings with information available delivered in the borough for the 2020/21 period, 485 have been built on previously developed land, which equates to 99% of all development. This demonstrates that the Local Plan strategy of directing the majority of growth in the borough towards the Investment and Growth Areas (IGA) on brownfield land is being adhered to. The allocated sites in the Local Plan also include areas of land that is not brownfield land capable of delivering in excess of 2,000 new dwellings during the remaining Plan period.
  - Fig 11: New and converted dwellings



Housing Completions on previously developed land

Completions not on previously developed land Completions on previously developed land

Housing Indicator 16: Number of specialist accommodation units Targets:



i. approved

#### ii. completed by type

2.30 There were no additional specialist housing units built in Redbridge during 2020/21. The Outer Northeast London Strategic Housing Market Assessment (2016) sets an annual figure of 108 additional specialist units for older people by 2032 but states that this need should be considered in partnership with other agencies.

Housing Indicator 17: Percentage of new dwellings completed with densities in dwellings per hectare:

Targets:

- i. Below the London Plan density range;
- ii. Within the London Plan density range; and
- iii. Above the London Plan density range
- iv. Average density of residential approvals
- v. Average density of residential completions
- 2.31 Planning Services is unable to provide data for this indicator. Going forward this data will not be collected as the new London Plan (2021) does not include density ratios, and all new development schemes will be design-led.

Housing Indicator 18: Number of empty properties brought back into use – Target: Net reduction in the number of empty properties.

- 2.32 The number of empty properties brought back into use during the period for 2020/21 is 62, with the annual target set by Environmental Health being 100. Of these, 58 had been empty for more than 12 months, with the target for bringing these back into use being 20 (which typically require more substantial engagement and are more likely to need renovations). Figure 12 below shows the trend compared to those of the previous five years.
- 2.33 The numbers are low due to the impact of the pandemic and national trends (restrictions and uncertainty for homeowners, impact on both rental and sales markets, effects on building materials supplies and reduced availability of contractors as well as the disproportionate effect of Empty Property Officer redeployment for the pandemic response for the first 4 months of the financial year).



#### Fig 12: Empty Properties



Number of empty properties brought back into use 2014-2021

#### 2.34 **Employment Indicators**

**Employment Indicator 1: Amount of employment land lost to development** Target: No more than 14.45 hectares of industrial land to be released from employment use over the plan period.

Losses of employment land in:

- i. development/regeneration areas and
- ii. town centres
- 2.35 During the 2015-2019 period (beginning with the start of the current Local Plan) there has been an overall loss of 15,579m<sup>2</sup> or 1.56ha in B1 to B8 floorspace. There was a further loss of 6,500 m<sup>2</sup> (0.65ha) in B2 to B8 floorspace during 2019/20, and a loss of 862m<sup>2</sup> (0.09ha) in B2 to B8 floorspace during 2020/21. The most recent loss was from storage to residential changes of use at 214-220 and 222-228 Maybank Road, South Woodford.
- 2.36 Local Plan Policy LP14 'Stimulating Business and the Local Economy' does plan for an overall managed release of 14.45ha of out of date, underperforming non-designated employment land (including industrial land) over the plan period (2015-2030) to encourage a more effective and efficient use of such land. See fig 13 below.



Fig. 13: Employment land lost to development



Release of Employment Land 2015-2020 Further Planned Release of Employment Land

2.37 Since the start of the Plan period, up to the end of March 2021, there has been a release of approximately 2.3ha of employment land. This represents an average of 0.38ha each year, which if continued for the entire Plan period would only see a release of 5.75ha of non-designated employment land.

Employment Indicator 2: Amount of floorspace developed for employment by type, by Investment and Growth Area.

Employment Indicator 3: Amount of floorspace by employment type, which is on previously developed land.

2.38 There has been no overall increase in employment floorspace in the borough, although, there has been a gain of 1,266m<sup>2</sup> in flexible use floorspace in Ilford Metropolitan Town Centre during 2020/21. However modest the gain, this is a positive statistic in terms of implementing Local Plan Policy LP14, which encourages mixed use employment led schemes in local business areas.

Employment Indicator 4: Employment land available by type.

2.39 No reliable, up to date data is available at present for this indicator.



#### 2.40 Retail and Commercial Indicators

Retail Indicator 1: Amount of completed retail, office, and leisure development. Target: Facilitating business growth in the borough with the provision of a minimum of 21,206m2 of new B1 space for SME's. Making provision for a minimum of 23,911sqm of comparison retail floorspace by 2030. Making provision for a minimum of 8,562sqm of convenience retail floorspace by 2030.

- 2.41 During the monitoring period, the Use Class Order was updated to create Use Class E, for Commercial, Business, and Service uses. This incorporates many retail, office, food and beverage, service, and leisure uses. During the period 2020/21 there was no recorded change in floorspace in uses now comprising Class E. However, this only considers larger commercial development over a 250m<sup>2</sup> threshold, as opposed to small scale extensions to business premises.
- 2.42 Local Plan Policy LP14 Stimulating Business and Local Economy aims to provide 21,206m<sup>2</sup> of flexible business floorspace for Small and Medium Enterprises (SME) in the borough up to 2030. Delivery in 2019/20 showed a loss of 2,388m<sup>2</sup> in B1 floorspace and an additional 717m<sup>2</sup> in flexible A1 floorspace; in 2020/21 there was no recorded change in floorspace overall the period between 2019 and 2021 represents low performance with regard to the target set out in Policy LP14.
- 2.43 If this trend continues the required levels of business growth for SME will not be met, and sufficient progress towards the required levels of comparison and convenience retail floorspace will not be made over the Local Plan period up to 2030.

Retail Indicator 2: Amount of completed retail, office, and leisure development in town centres.

Targets: Provision of new community infrastructure in a timely and efficient manner in appropriate locations to support population, housing, employment, and economic growth, in accordance with Appendix 2 of the Local Plan and the Infrastructure Delivery Plan.

Enhancing the quality of Ilford's retail offer more benefitting its Metropolitan Town Centre Status Increasing the numbers of bed spaces (visitor accommodation) in the borough to help promote Redbridge as a destination for leisure and tourism.

2.44 There were no major retail, leisure or office developments completed during the 2020/21 period.

**Retail Indicator 3: Numbers of hot food takeaways, betting shops, shisha bars, and payday lenders within each local / town centre.** Targets: Enhancing the quality of Ilford's retail offer more benefitting its Metropolitan Town Centre Status.

2.45 We are unable to report on this indicator at present through lack of reliable data.



Leisure & Tourism Indicator 1: Number of hotels in borough. Increasing the numbers of bed spaces (visitor accommodation) in the borough to help promote Redbridge as a destination for leisure and tourism. Number of new hotels, guest houses and spaces.

2.46 We are unable to report on this indicator at present through lack of reliable data.



## Section 3: Theme 2 - Promoting a Green Environment (Local Plan Policies LP19-LP25)

#### 3. Strategic Objective 2

- 3.1 The theme of promoting a green environment involves the implementation of Local Plan policies LP19-LP25. Redbridge has some of the most extensive and diverse natural environments in London. The strategic objective is focused on policies which address climate change guiding developments in sustainable locations.
- 3.2 Indicators and targets for public transport journeys, parking, open space, biodiversity habitats, pollution, and renewable energy.

#### 3.3 Transport Indicators

**Transport Indicator 1: Number of jobs within a 45 minute public transport journey of each local centre and town centre (as measured in the AM peak).** Target: provide an annual increase in the number of jobs available within 45 minutes of each local centre and town centre.

3.4 Figure 14 shows employment data obtained from Transport for London's (TfL) online Time Mapping tool Web CAT, for 2018/19, 2019/20 and 2020/21. The graphs show the estimated number of jobs in London and the Southeast that are within a 45-minute journey from local and town centres in Redbridge. The figures in the graphs indicate an increase every year in the number of jobs within the 45-minute public transport journey timeframe from each of the centres. The 2020/21 data uses the 2031 forecasted data from TfL. The previous year uses the 2021 forecasted data.



Fig 14: Jobs within reach via public transport





Transport Indicator 2: Amount of new residential development within 30 minutes public transport time of: a GP; an A&E department; a primary school; a secondary school; areas of employment; and a major retail centre(s). Target: Reduce dependence on the private car, minimising greenhouse gases from vehicle emissions and improving air quality.

3.5 Figure 15 below maps residential completions during the reporting period within a 30-minute public transport journey of GPs, A&E departments, primary schools, secondary schools, employment areas and major retails centres.



Fig 15: New residential development within a 30-minute public transport journey of key infrastructure



**Transport indicator 3: Amount of completed non-residential development within Use Class Orders (UCOs) A, B and D complying with car-parking standards set out in the local Plan.** Target: Maintain at least 50 per cent of net B1 additional floorspace in PTAL Zones 5-6. Promoting walking, cycling, and use of public transport.

3.6 We are unable to report on this indicator at present through lack of reliable data, partly due to the changes in the use classes order. A new indicator will need to be developed to collect this data.

#### 3.7 **Open Space Indicators**

Open Space Indicator 1: Amount of eligible open spaces managed to Green Flag Award standard.

3.8 Fig 16 shows a total of 9 sites in Redbridge which were managed to Green Flag standard in 2020/21. These sites were the same as in the previous reporting year, including Valentines Park, South Park, Goodmayes Park, Ilford War Memorial,



Elmhurst Gardens, Clayhall Park, Seven Kings Park, Claybury Park and Hainault Forest. The total area covered by the 9 sites is 313.016 hectares. There has been no change to this indicator since the previous year.



Fig 16. Maps the 9 Green Flag sites across the borough

#### 3.9 Biodiversity Indicators

Biodiversity Indicator 1: Change in areas and populations of biodiversity importance, including:

- i. Change in priority habitats and species (by type); and
- ii. Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance
- 3.10 Redbridge Council has taken a number of positive steps in nature conservation during the reporting period which have mainly been delivered by Vision RCL. In 2021, the Nature Conservation Team held 96 volunteer workdays across Redbridge which involved 120 volunteers contributing over 4,510 hours of their time which was an increase from the previous year. 13,500 trees were planted, 25 new bat boxes were installed, 3,900 bags of litter were picked from parks and green spaces, 2 new woodlands and 7 stag beetle stumperies were created. Survey work undertaken to understand baseline species data and to monitor the success of habitat management revealed a total of 4,377 different species with 95,807



separate wildlife records. In total 50 different species of butterfly, 553 species of beetle, 11 species of bat, 4 species of deer, 242 species of bird, 427 species of fungi, 18 species of dragonfly/damselfly and 5 species of reptile were recorded.

3.11 Figure 17 contains data obtained from GiGL<sup>2</sup> revealing that 51 different priority species were recorded in Redbridge during 2020/21 which was an increase of 7 from the previous year. This difference may be attributable to missing data sets and inconsistencies in identifying and recording species. The season in which the survey was conducted also makes a difference to the number of species.





Table 3: Numbers of Green Information for Greater London (GiGL) species records for	
the financial years up to 2020/21:	

Number of records	2012/13	2016/17	2018/19	2019/20	2020/21
All species	4110	3347	2476	41409	1509
Designated species	4068	1271	915	728	360
LISI species	39	28	21	895	39

Table 4: total number of individual species that the records represent:

Number of species	2012/13	2016/17	2018/19	2019/20	2020/21
All species	307	493	178	339	379
Designated species	94	93	49	50	51
LISI species	8	10	4	16	9



3.12 There has been no net loss of Sites Important to Nature Conservation, and there was also no net loss of open space during the reporting period. Figs 18, 19 and 20 below capture some more important statistics for species and nature conservation in the borough for the 2020/21 period.



Fig. 18: Species numbers 2020/21

Fig. 19: Nature Conservation Review for 2020



Fig. 20: Nature Conservation Review for 2021





3.13 The infographics above shows the information captured in paragraphs 3.10 and 3.11 above.

#### 3.14 **Pollution Indicators**

Pollution Indicator 1: Levels of the following pollutants: PM2.5 particulates, PM10 particulates, Carbon Monoxide, Nitrogen Dioxide, Ozone, Sulphur Dioxide.

Target: Net reduction in annual average, hourly peak, and daily peak readings of all monitored pollutants.

- 3.15 The Council monitors levels of air pollutants and publishes the findings on an annual basis (see tables 5, 6 and 7 below, which contains data for levels of Nitrogen Dioxide, PM<sub>10</sub> particulates, and PM<sub>2.5</sub> particulates). The findings for 2020 are published in the Redbridge Air Quality Annual Status Report.
- 3.16 Overall the figures in table 5, 6 and 7 show that in all measured areas of the borough concentrations of nitrogen dioxide (NO<sub>2</sub>), PM<sub>10</sub> and PM<sub>2.5</sub> particulate concentrations are below the annual UK objective, with the exception of the area around the North Circ. Rd, Southbound Wanstead Pk (Table 5), which exceeds those levels.

Table 5: Annual Mean NO <sub>2</sub> Concentrations ( $\mu$ g m <sup>-3</sup> ) Monitoring Results for 2020					
Site ID	Site Name	Within AQMA?	Annual Mean Concentrations (μg m³) for 2020 against annual UK objective of 40 μg m³		
CM4	Urban Traffic (Gardner Close)	Y	27		
CM7	Automatic Background (Ley Street)	Y	21		
DT A	Mayfield School	Y	20.4		
DT B	llford Lane	Y	36.5		
DTC	Ilford Lane BP	Y	34.4		
DT D	Ley Street	Y	20.7		
DT E	Gardner Close	Y	28.0		
DT F	Fullwell Cross	Y	29.4		
DT G	Perth Road	Y	35.9		
DTH	Westbound Eastern Ave	Y	37.2		
DTI	Central Res Eastern Ave	Y	34.7		
DT J	Eastbound Eastern Ave	Y	37.1		
DT K	Parham Dr	Y	31.9		
DTL	North Circ. Rd, Northbound Royston Gd	Y	27.6		
DT M	North Circ. Rd, Southbound Wanstead Pk	Y	50.3		
DT N	Ethel Davis School	Y	19.3		
DTO	Grove Road	Y	33.5		
DT P	High Road Woodford	Y	24.9		
DTQ	M11	Y	34.0		
DT R	Winston Way Primary Sch.	Y	37.1		
DT S	Winston Way Gyratory	Y	39.3		
DT T	Chadwell Heath Primary School	Y	31.4		
DTU	Goodmayes Primary School	Y	26.4		
DT V	Isaac Newton Academy	Y	22.6		
DT W	Inside Winston Way Primary School	Y	27.3		

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#### Table 6: Annual Mean PM<sub>10</sub> Concentrations (µg m<sup>-3</sup>) Monitoring Results for 2020

Site ID	Site Name	Within AQMA?	Annual Mean Concentrations (μg m³) for 2020 against annual UK objective of 40 μg m³
CM4	Urban Traffic (Gardner Close)	Y	17
CM7	Automatic Background (Ley Street)	Y	15

#### Table 7: Annual Mean PM<sub>2.5</sub> Concentrations (µg m<sup>-3</sup>) Monitoring Results for 2020

Site ID	Site Name		Annual Mean Concentrations (μg m <sup>-3</sup> ) for 2020 against annual UK objective of 25 μg m <sup>-3</sup>
CM7	Automatic Background (Ley Street)	Y	13

3.17 There are a number of actions and policies being implemented at a local and regional level to reduce pollution levels even further. These can be viewed in the Redbridge Air Quality Action Plan 2020-2025.

#### 3.18 Flooding indicators

Flooding Indicator 1: Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.

3.19 There was one planning permission granted contrary to the initial advice of the Environment Agency, however the application was granted with conditions attached. The application reference number is 2420/20 for the development sites at Daffodil Gardens and Lavender Place, Daffodil Gardens, Ilford.

#### 3.20 Energy Indicators

Energy Indicator 1: Renewable energy capacity installed by type.

3.21 Figure 21 below shows the solar photovoltaic (pv) renewable energy capacity installed across 33 different buildings in Redbridge. These figures have not changed since the previous reporting year for 2019/20 – the buildings are a mix of schools and council-owned buildings. A total of 17 council-owned housing sites have solar pv installed. A total of 16 schools have solar pv installed. The Council continues to incorporate the provision of **solar panels** in **new developments** and 8 development proposals have solar panels/photovoltaics incorporated into their planning conditions from the beginning of 2021 to date.





Fig 21 Solar PV installations across the borough



## Section 4 Theme 3: Achieving Design Quality (Local Plan Policies LP26-LP33)

#### 4.1 Strategic Objective 3

4.2 Achieving high quality design is the focus of the third strategic objective and is delivered via policies LP26-LP33. High quality design is the key to sustainable development and the Council has sought to raise the standard of design in the borough whilst protecting and reinforcing its character.

# 4.3 Indicators and targets for design quality, tall buildings, conversions, heritage & listed buildings, and basements.

Design Indicator 1: Delivering high quality mixed-use development

#### 4.4 **Design Indicators**

4.5 A proxy indicator is used to measure the trend for good design, which is the application of Local Plan Policy LP26: Promoting High Quality Design. Figure 22 below reveals that a total of 1,266 applications were approved, and 642 applications were refused within the reporting period which applied the policy.



Fig 22: Local Plan Policy LP26 applied to planning applications

- 4.6 The Council now uses an independent Design Review Panel, operated by FRAME Projects to advise applicants, Council officers and Planning Committee on the design of developments. This advice is given at pre-application stage for major developments (10 units +). The aim of this advice is to ensure better quality developments.
- 4.7 A total of 29 applications were approved and 13 were refused within the reporting period which applied Local Plan Policy LP28: Advertising and Shopfronts. Policy LP28 is being applied to new development proposals where appropriate, ensuring shopfronts and signage respect the overall character and appearance of buildings and the street scene.





Fig. 23: Policy 28 applied to planning applications

4.8 A total of 116 applications were approved and 39 were refused within the reporting period which applied Local Plan Policy LP32: Sustainable Design and Construction, and/or had BREEAM mentioned in the application decision and/or planning conditions (see Fig 24 below). The findings show that the use of LP32 and BREEAM is consistently being applied to the decisions of planning applications

Fig 24: application of Policy LP32 and/or had BREEAM in planning decision/conditions



**Design Indicator 2: Number and location of tall buildings.** Review of quality of tall buildings provided within the borough, undertaking Building for Life assessments.

**Design Indicator 3: Number and location of tall buildings approved.** Tall buildings are appropriately located and well-integrated into the urban fabric and are suitable to their location.







4.9 Five tall building applications were approved within the reporting period and Local Plan Policy LP27: Tall Buildings was applied in the decision. The applications are listed in Table 8 below and fall within the Council's Tall Building Zones.

Table 8: Tall buildings approved 2020/21
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Site	Address	Decision Date
4182/18	Development Site At 573 To 585, High Road, Seven Kings, Ilford – 11 storeys	04/12/202 0
4557/18	Development Site At 1 To 15 And 17 Station Road And 16 To 26, Cranbrook Road, Ilford – 42 storeys	15/09/202 0
4570/18	Development At Recorder House 539, High Road, Ilford – 13 storeys	15/09/202 0
0337/19	Development Site At 74 To 76, High Road, Ilford – 19 storeys	15/02/202 1
4732/19	Development Site at Former 888, High Road, Chadwell Heath, Romford – 8 storeys	05/01/202 1

#### 4.10 Heritage Indicators

Heritage Indicator 1: Number of all assets on the Heritage at Risk Register. Target: Annual reduction in the number of assets on the Heritage at Risk Register.



- 4.11 The Council is on target in attaining a reduction in the number of assets on the Heritage At Risk Register. There is now a total of 8 assets on the Register. Table 9 below shows the status of the full list of assets.
- 4.12 Christ Church, Wanstead has been added to the Register. This church falls within Wanstead Parish and is administered alongside the Church of St Mary, Wanstead (also on the Heritage at Risk Register) by the Church of England. The Parish has secured a grant from the National Heritage Lottery Fund and is working with Down Jones Architects on options to restore the historic fabric.

Table 9: Status of heritage assets on the At-Risk Register

Heritage Asset	Туре
Bungalow Estate	Conservation Area [listed as "Mayfield, Ilford"]
Wanstead Park	Conservation Area and Registered Park and Garden Grade II* [counted twice in Register]
Woodford Bridge	Conservation Area
Church of St Mary, Overton Drive, Wanstead E11	Listed Building Grade I
Christ Church, Wanstead Place, Wanstead E11	Listed Building Grade II*
Garden Temple in garden of Temple House, 14, The Avenue, Wanstead E11	Listed Building Grade II*
The Grotto, Wanstead Park	Listed Building Grade II
831, High Road, Ilford	Listed Building Grade II

# Heritage Indicator 2: Number of conservation areas with up to date character appraisals and management plans.

Heritage assets within the borough are conserved and enhanced in a manner appropriate to their special interest, character or appearance and significance.

4.13 New appraisal and design guide documents and a newly extended conservation area to include Aldersbrook and Lake House were adopted and designated in September 2020. On 2 November 2020 Redbridge Council served an Immediate Article 4 Direction in the Aldersbrook and Lake House Conservation Area. The Council confirmed the Immediate Article 4 Direction at a Cabinet meeting on 16 March 2021.

Heritage Indicator 3: Planning/Listed Building Consent applications for Listed Buildings approved in accordance with the advice of Historic England.

4.14 There were 14 listed building consent applications determined during the reporting period. 10 were granted listed building consent and 4 were refused consent. 5 applications did not satisfy the criteria for consultation to Historic England. Historic England did not raise any objections for 2 applications. On 7 applications no comments were received by Historic England. Therefore, there were no listed building applications approved in accordance with the advice of Historic England.



#### 4.15 Basement Indicators

Basement Indicator 1: Number of basement applications.

- 4.16 For this indicator, the application of Local Plan Policy LP31: Basement Development in planning decisions has been used as a measure for the number of basement applications. In 2020/21, of a total of 31 applications, 17 applications were approved and 13 were refused. 1 application was withdrawn. This is an increase in overall application numbers and refusals from previous years.
- 4.17 This shows that there is a small increasing trend for basement development applications, consisting of a mixture of basement excavations to existing homes, the excavation of new/conversion of existing basements to provide self-contained flats, and larger commercial and mixed-use developments incorporating basements; although it is important to note that impacts are considered in the decision using basement impact assessments.



Fig 26: Basement applications



## Section 5 Theme 4: Protecting and enhancing the borough's assets (Local Plan Policies LP34-LP40)

#### 5.1 Strategic Objective 4

5.2 The final strategic objective relates to promoting and enhancing the brough's assets and monitors the implementation of policies LP34-LP40 which relates to protecting Green Belt and open spaces. Redbridge has a significant amount of Green Belt to the East of the borough which separates Hainault from Barkingside and a band which runs north south along the Roding Valley that separates Woodford and Wanstead with Woodford bridge and Ilford.

#### 5.3 Indicators and targets for biodiversity and open land.

#### 5.4 **Biodiversity Indicators**

Biodiversity Indicator 1: Change in areas and populations of biodiversity importance, including:

- i. Change in priority habitats and species (by type); and
- ii. Change in areas designated for their intrinsic environmental value including sites of international, national, regional, sub-regional or local significance.

Target: No net loss of Green Belt and Metropolitan Open Land.

Biodiversity Indicator 2: Number of Planning applications affecting sites of biodiversity importance.

Target: No net loss of open spaces in areas of high open space deficiency.

- 5.5 There has been no net loss of Green Belt or Metropolitan Open Land during the reporting period, and there was no net loss of allotment sites during the reporting period 2020/21. There was also no net loss of international, national, and local sites of nature conservation importance including Sites of Special Scientific Interest (SSSI) covering Epping Forest, Wanstead Flats and Hainault Forest.
- 5.6 During the reporting period, the number of Local Nature Reserves, 4, still remains. Those being: Claybury Park, Fairlop Waters, Hainault Forest Country Park, and Hainault Lodge
- 5.7 There were 9 planning applications where the proposals may have impacted on Sites of Important for Nature Conservation (SINC) during the reporting period, however there was no net loss of SINCs. This remains on target as per last year. The Council is hoping to conduct a review on the sites of importance to nature conservation in the borough which may result in additional sites depending on survey outcomes.
- 5.8 One application was refused in 2020/21 which considered Local Plan Policy LP37: Green Infrastructure and Blue-Ribbon Network. The reference number for the application is 0655/20 for 92 Belgrave Road, Ilford.



## Section 6 Monitoring and delivery (Local Plan Policy LP41)

- 6.1 Policy LP41 sets out how the Council will monitor the effectiveness of the delivery of policies in the Local Plan to ensure that the Council works with its partners to deliver plans and proposals and provide the infrastructure required for both current and future residents in Redbridge.
- 6.2 Indicators and targets for infrastructure, planning obligations/CIL, determinations, refusals, appeals, enforcement notices and S106 apprenticeships.
- 6.3 Infrastructure Indicators

Infrastructure Indicator 1: Number of relevant new infrastructure programmes completed. Target: Delivery of key infrastructure programmes as set out in the Infrastructure Delivery Plan. Education, Redbridge Living, Health, community hubs, transport, leisure.

- 6.4 For the period 2020/21 the total gross new space for health facilities was 847m<sup>2</sup> which represents a net increase of 232m<sup>2</sup> once redundant space was taken into account. This includes:
  - The Development Site at Land North of 741, Cranbrook Road, Ilford, where a twostorey temporary building for use as a clinical facility (D1) for two GP practices was erected.
  - The Conversion of a property from HMO to a Dental Surgery at 28, Beehive Lane, Ilford.
- 6.5 During the same period, the total net increase in floorspace provided for educational facilities was 3,340m<sup>2</sup>.

Key new facilities completed included the following:

- The development of a new class D1 Special Educational Needs Disability ("SEND") school within William Torbitt Primary School.
- A detached two storey building for use as a Design Technology block and associated landscaping at Mayfield School.
- 6.6 There are a variety of borough led interventions to improve the safety, capacity, and sustainability of the borough's transport network, including the Local Implementation Plan (LIP) funded by TfL and the Council's own capital budget. Key projects include the Ilford Garden Junction project phase 1, the A118 Ilford western gyratory removal and low emission neighbourhoods.
- 6.7 Redbridge LIP3 document has been approved and funding from Transport for London (TfL) will help deliver the objectives of the Mayor's Transport Strategy which includes goals of Healthy Streets, Vision Zero (accident reduction), a good public transport experience, new homes, and jobs.



- 6.8 Work is currently ongoing on the following TFL-led projects:
  - Cycling Future routes 8km linking llford and Barking Riverside town centres.
  - Step free access At stations including Ilford and Snaresbrook. The improvements at Ilford are linked to the reconstruction of the station building, which is due to be completed in 2022.
- 6.9 The AMR previously reported on three schemes by Redbridge Living. These will now be delivered directly by the Council. The Seven Kings Car Park Scheme is currently under consideration at the planning application stage. The schemes at Loxford Lane and Clements Road are at stage 2 of the GLA's referable application process.
- 6.10 In terms of new leisure facilities created, two schemes have been completed in the period the report covers with total floorspace created being 2,454sqm.

Infrastructure Indicator 2: Amount of Planning Obligations/CIL secured and spent, and by type.

6.11 See the Council's 2020/21 Infrastructure Funding Statement for information related to this indicator at: <u>https://www.redbridge.gov.uk/planning-and-builddata</u> ing/planning-policy/infrastructure-funding-statement/.

#### 6.12 **Determinations Indicators**

Determinations Indicator 1: Percentage of major planning applications determined within 13 weeks.

Target: 65% of major planning applications to be determined within 13-weeks. Determinations Indicator 2: Percentage of planning applications processed in 8-weeks (Minor).

Target: 65% of minor planning application to be determined within 8-weeks. Determinations Indicator 3: Percentage of planning applications processed in 8-weeks (Other).

Target 80% of other planning applications to be determined within 8-weeks.

- 6.13 Performance in determining planning applications for 2020/21 is set out in table 10 below. The table shows an increase in performance for both major and minor applications compared to the 2019/20 Authority Monitoring Report (AMR). This is a great achievement as all targets were exceeded, and the year-on-year trend of improved performance since 2015 is still being continued.
- 6.14 This performance is set against a background of increased numbers of planning applications received by the Planning Service during the reporting period, with Redbridge now receiving the 11<sup>th</sup> highest number of applications in Greater London.



Application Type	Target	Actual Performance for 2019/20	Actual Performance for 2020/21
Major Planning Applications	65% of major planning applications to be determined (or within agreed Extension of Time)	80.0% (12/15)	96.67% (29/30)
Minor Planning Applications	65% of minor planning application to be determined within 8- weeks (or within agreed Extension of Time)	73.2% (270/369)	93.3% (387/412)
All planning Applications	80% of other planning applications to be determined within 8- weeks (or within agreed Extension of Time)	<b>89.4% (2,192/2,453</b> )	97.55% (2,312/2,370)

#### Table 10: Planning Approval timeframes targets/actual (2020/21)

#### Fig 27 Planning applications determined



#### 6.15 Enforcement Indicators

Enforcement Indicator 1: Number of Enforcement Notices Issued.

6.16 Figure 28 below shows the number of Enforcement notices issued during the 2020/21 reporting period. In terms of Planning Enforcement, as reported last year the Council reviewed its approach to planning enforcement and moved away from a negotiated agreement approach to an approach directly tied to the statutory timescales for action, which had an immediate impact in improving outcomes.



- The number of enforcement notices issued for 2019/20 was 52, the number for 2020/21 is much the same at 50 both numbers are an improvement compared to 30 served in 2018/19 under the negotiated agreement approach
- Redbridge was also placed 5<sup>th</sup> in the country for serving contraventions notices, with 108 served during the 2020/21 reporting period.



Fig 28: Number of enforcement notices issued - 50

6.17 Appeals Indicators

Appeals Indicator 1, Including: Number of appeals against non-determination made Number of appeals against non-determination upheld Number of appeals against refusals made Number of appeals against refusals that are upheld

6.18 The 2020/21 reporting statistics for appeals are as follows:

- Number of appeals against non-determination made 1
- Number of appeals against non-determination upheld (dismissed) 1
- Number of appeals against refusals made 20
- Number of appeals against refusals that are upheld (dismissed) 56

#### 6.19 Apprenticeship Jobs Indicators

Numbers of apprenticeships, job brokerage agreements, and contributions relating to skills and training through Section 106 agreements. Continuous partnership working and cross-boundary working.

6.20 The development site at 27-37 Perth Road, Gants Hill secured the employment of 7 people from Redbridge through S106 planning obligations. In total there were 234 employment outcomes for residents using the Work Redbridge service (up to 31/03/2021).