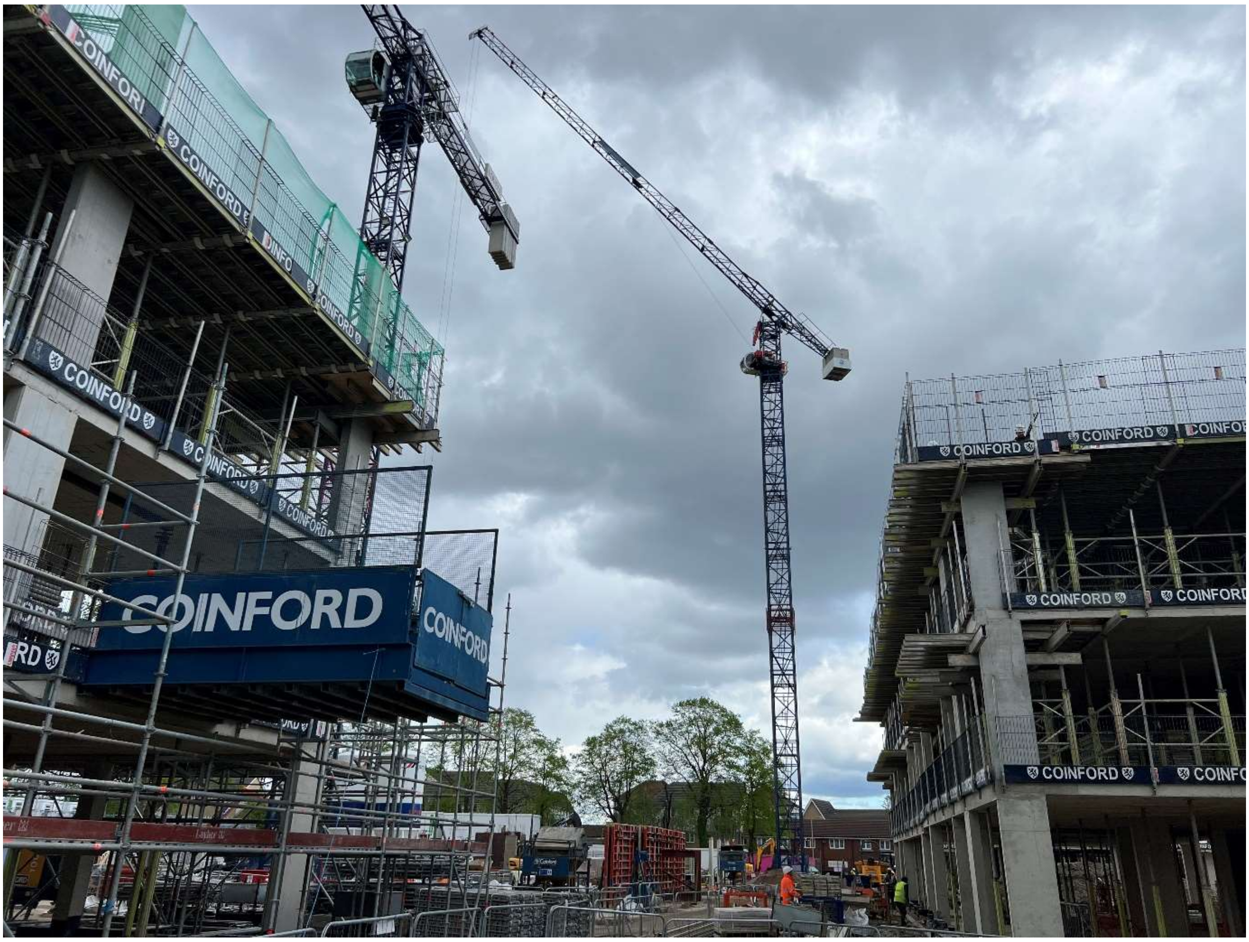
# London Borough of Redbridge
# 2023 Housing Delivery Test Action Plan

**Published June 2025**



London Borough of Redbridge

## 1.0 Introduction

1.1 This Housing Delivery Test (HDT) Action Plan sets out several actions designed to address the significant under-delivery and low supply of housing in Redbridge. This is in direct response to the published results from the Housing Delivery Test 2023 Measurement (published in December 2024) by the Ministry of Housing, Communities and Local Government (MHCLG).

1.2 The Housing Delivery Test (HDT) was introduced by the Government as a monitoring tool to assess whether local planning authorities (LPAs) are enabling the delivery of enough new additional homes to meet their local housing needs. The HDT compares the number of new homes delivered over the previous three years with an authority's housing ‘requirement’ over the same period. The following sets out the actions that LPAs are required to undertake dependent on their HDT results:

| Percentage score on HDT: | 95% or less | 85% or less | 75% or less |
|---|---|---|---|
| Consequences for LPA: | Must produce a HDT Action Plan | Previous measure plus<br>20% buffer on the Five-Year Land Supply | Previous measures plus<br>Presumption in Favour of Sustainable Development |

### *About Redbridge’s Target*

1.3 Redbridge’s housing target is imposed on the Council by the Greater London Authority through the London Plan. The target follows the national position set out in the National Planning Policy Framework. Whilst various policy changes (regional and national) vary the targets, Redbridge’s housing target within the Local Plan adopted in 2018 was to deliver 1,123 new homes per year. Following the adoption of the new London Plan in 2021, the target increased to 1,409 per year.

1.4 The target is “capacity-based”. This means that the target is based upon the existing pipeline of planning permissions, as well as the identified capacity of large sites for redevelopment, as well as a “small sites component” which mostly comprises windfall development.

1.5 The housing target is a *potential* figure because the number of homes approved and built out on the large development sites is usually less than identified. If the sites do not progress from allocation to permission to construction, then the housing target will not be met.

## 2.0 The Housing Delivery Test 2023 Measurement results for Redbridge

2.1 The Housing Delivery Test results reveal that during the three-year period of measurement (2020-2023), Redbridge only delivered 39% of its housing requirement target.

2.2 The National Planning Policy Framework (NPPF) is a material consideration in planning decisions. The NPPF requires that plans and decisions should apply a presumption in favour of sustainable development where the HDT indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Since Redbridge only delivered 39% of its target, the **presumption in favour of sustainable development** is applied to planning decisions.

2.3 Note that the housing delivery requirement was adjusted in 2020-21 due to COVID-19 related impacts on the construction sector. The housing delivery target for 2022-23 is divided *pro rata* between an annual target of 1123 and an annual target of 1409, because the lower target may be used within the first five years of adoption of the Local Plan – i.e. until 15th March 2023.

**Table1: Redbridge HDT results by year 2020-21 to 2022-23**

| **Year** | **2020-21** | **2021-22** | **2022-23** | **Cumulative 2020-23** | **HDT implication** |
|---|---|---|---|---|---|
| Delivery | 645 | 283 | 243 | 1171 | Presumption in Favour |
| Target | 748 | 1123 | 1136 | 3007 | |
| % delivered | 86% | 25% | 21% | 39% | |
| Surplus / (shortfall) | (103) | (840) | (893) | (1836) | |

2.4 Table 1 shows the Council's published HDT results for the years 2020-2023. Delivery is below the 75% threshold and so Redbridge is subject to the presumption in favour of sustainable development when determining planning applications. This means the strategic housing policies in the *Redbridge Local Plan 2015-2030* are now "out of date" and in effect superseded. The "tilted balance" applies, which means new housing development should be allowed, unless the adverse impacts of the development would significantly and demonstrably outweigh the benefits.

2.5 NPPF Paragraphs 11 to 14 state when and how the presumption in favour of sustainable development is used for granting planning applications unless:

*"The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*

*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."*

2.6 In practice, the above quote from the NPPF means it will be difficult to use *Redbridge Local Plan 2015-2030* policies to refuse a development unless it was particularly harmful. It will be more difficult to refuse a development that fails to provide supporting infrastructure; and it will also be more likely that developments are allowed at appeal and costs are awarded against the Council.

### 3.0 Housing Delivery Analysis

3.1 Redbridge is a primarily residential borough in northeast London, of some 310,300 people (2021 Census rounded figure) covering 65.41km$^2$. Its main town is the metropolitan centre of Ilford, with smaller district centres at Barkingside, Gants Hill, South Woodford, and Wanstead. The borough benefits from good public transport links to central London via the Central line and recently completed Elizabeth Line, as well as road links to the national motorway network. The Local Plan Key Diagram (Figure 1) shows the key transport links and growth areas within the borough.

**Figure 1: Local Plan Key Diagram**


3.2 The existing housing stock is overwhelmingly privately owned, with 98,561 private sector dwellings, 4,530 Council dwellings, and 4,909 Registered Provider dwellings: out of an overall stock of 108,000 dwellings[1]. Owner occupation is high but there has been a significant shift to the private rented sector in recent years. Redbridge adopted its present Local Plan in March 2018. This plan directs most of the new housing to the borough's five Investment and Growth Areas (Ilford, Crossrail Corridor, Gants Hill, Barkingside, and South Woodford). However, the Local Plan policies and its housing requirement has been superseded by the 2021 London Plan and subsequent revisions to the National Planning Policy Framework.

3.3 The overwhelming majority of development occurs on previously developed land (or "brownfield" land). This represents an efficient use of space which is usually well situated for public transport and local services but can present challenges because of existing use values and the availability of sites in active use.

3.4 Ilford and the Crossrail Corridor are by far the largest of the Investment and Growth Areas regarding the number of homes expected from allocated sites and are also expected to contribute a considerable proportion of windfall sites. The need for effective delivery of housing and supporting infrastructure from within the Local Plan is urgent because Redbridge is undergoing rapid change demographically which includes growth in both population and average household size. Much of this is driven by welfare reform and increased property prices and rents in more central boroughs such as Tower Hamlets and Newham.

3.5 Redbridge has increasing housing demand as evidenced by the fact that it is the English local authority with the joint largest average household size, of 3.0 people (2021 Census), with house price growth significantly above the average for London.

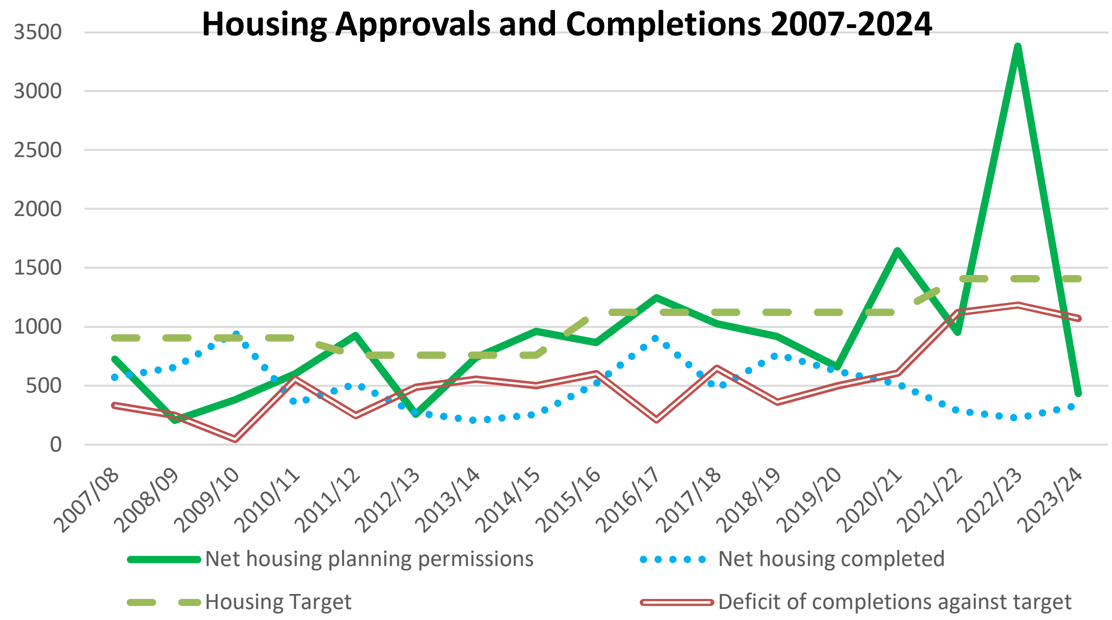
3.6 Essentially, Redbridge has seen high growth despite low housing delivery, and its 2021 Census results give a population that was not projected to be reached until 2028 (using 2018-based subnational population projections published in 2020).

3.7 The Covid-19 Pandemic led to significant fluctuations in the rental and owner-occupied housing markets, with inner London locations seeing a sharp fall in demand during the initial lockdowns. Redbridge, however, saw an increase in demand; and London's rental market has continued to see high demand for properties. Concurrently, net international migration to London has increased and housing completions across London have decreased.

3.8 The shrinking supply of private rented properties, owing to rebounding demand and a withdrawal from the market by small landlords, has resulted in significant difficulties for low-income households, and is increasing demand for temporary accommodation. This is placing an increasing strain on the Council's budget due to the high level of demand and the cost of leasing such accommodation.

[1] Figure as of 31 March 2023. Based on LT 100, accessed 01 April 2025. https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants

**Figure 2: Housing approvals and completions v. target**




3.9 Figure 2 shows that there is typically a time lag between increases / decreases in the number of homes granted planning permission, and corresponding changes in completion figures. There is also a drop-off in numbers as permissions are superseded or lapsed.

3.10 At the end of March 2025, there was a pipeline of approximately 6,590 consented net conventional homes, of which around 2,520 have commenced, and a remaining 4,070 are yet to commence development.

3.11 These commenced dwelling numbers exclude known schemes which have technically commenced where schemes have discharged all conditions but where no substantial construction activity has been recorded. There are approximately 800 dwellings within such schemes.

3.12 There has been a sustained upward trend in dwelling approvals, however, there has been a decline from 2022/23, when 3,382 homes were approved as compared to 433 in 2023/24. This large spike in permissions is mostly due to 8 development schemes above 50 units approved in 2022/23, of which the Tesco Goodmayes scheme is the largest (1,280 units); and has contributed significantly to the overall housing pipeline.

3.13 This increase in planning approvals includes schemes of varying complexity and certainty and will naturally take some time to be built out and contribute to housing delivery. However, some major schemes were permitted during this time, such as One Goodmayes (former Homebase site) for 573 homes, which has seen its first completions in the 2024/25 financial year.

3.14 This pipeline of major developments is concentrated in Ilford and the Crossrail Corridor, alongside mostly smaller infill sites dispersed around the borough. The mixture of unit sizes and tenure mixture reflects these sites.

## 4.0 Key factors affecting housing delivery.

4.1 There are several factors affecting housing delivery, some of which are within the Council's gift and many which are not. At a macro-economic level, Figure 2 effectively demonstrates the impact of wider economic cycles with significant increases in build costs, in the context of rising interest rates and worsening personal finances, all having a negative impact on development activity.

4.2 Nationally, the Local Government Association estimate that 40% of planning permissions expire or remain undelivered; with analysis published in 2021 showing that 2,782,300 homes were approved in England from 2010-2020 whereas 1,627,730 homes were completed within that time ("Over 1.1 million homes with planning permission waiting to be built - new LGA analysis" 08 May 2021). Larger consented schemes can take many years to deliver, and the last 7-8 years have been among the most housing market's most volatile in living memory. More locally, several factors impact on housing delivery rates including:

- Locally specific challenges around viability; build costs are approximately 85-90% of those in central London for any given building typology, and yet sales values - although rising – are much lower than central London. This makes Redbridge a relatively unattractive place for private sector-led development and reduces the opportunity to cross-subsidise affordable housing.
- Sites allocated in the Local Plan are predominantly large urban sites, some with complex landownership which generally take more time to come forward as applications.
- Some sites in the Local Plan have more specific challenges around the closure / relocation of existing uses and would require additional work with affected businesses and other groups to realise the redevelopment opportunity.
- The Local Plan relies on higher density (and therefore higher build cost) developments located in areas with lower sales values, meaning changes to either build costs or sales values risk making development less attractive.
- Many of the Borough's larger consented schemes, including, Bodgers and Metro Tower are yet to commence (or substantially commence) development. There are currently around 6,590 consented homes, of which around 60% are yet to commence.

## 5.0 Actions

5.1 Under our previous Housing Delivery Test Action Plans, the Council has:

- Actively engaged private sector developers, Registered Providers, and others to build relationships, facilitate investment and development, and ultimately encourage delivery of high-quality new housing.
    - The Council Cabinet formally approved the Housing Strategy 2023-2028, and the Housing Strategy team is working closely with planners and developers to implement the delivery focused parts of the Housing Strategy and help shape schemes.
- Launched Phases 2 and 3 of the Housing Revenue Account (HRA) housebuilding programme. This programme is delivering across several schemes, including the largest

council housing schemes in a generation at Little Gearies (103 homes) and Loxford Lane (159 homes).
    - The current HRA Phases 2 and 3 programme is expected to complete in 2025. Due to current borrowing costs, the capacity for additional HRA schemes is limited.
- Actively sought to work with developers and neighbouring landowners to bring forward larger, strategic sites where the Council is not the sole landowner. This has particularly focussed on Ilford Town Centre; and comprises a structured approach to working with the private developers on stalled sites.
- Held a focussed programme of targeted meetings with developers of sites with planning permission, as well as allocated sites that have not had any planning applications.

**2025 Actions**

5.2 The Council is working with the GLA, who are producing the Ilford Opportunity Area Planning Framework. This is a delivery-focused document focusing on supporting delivery within the Ilford Opportunity Area, which covers the area of Ilford Town Centre.

5.3 The Council are working with Urban Intelligence to develop and use their PlaceMaker platform to assess the development potential of sites previously not included within the Local Plan or brownfield register.

5.4 The Council are working with private developers and registered providers to support the delivery of the Housing Strategy, and are reviewing land held within the Housing Revenue Account with development potential.

5.5 The Council has published an updated Local Development Scheme, which includes a timetable to produce a new Local Plan.

5.6 The Council will continue to work with landowners and developers we are already engaging with. We will continue discussing how we can remove the barriers to development and unlock stalled sites with the continuation of the systematic programme of engagement with developers and landowners of other stalled sites with a focus on medium and small-scale sites.

5.7 The Council will also continue to contact all developers of major development sites where there has recently been a pre-application meeting, but there has been no further contact with the planning department. The purpose of this follow up will be to ascertain timescales for submission of the planning application and any obstacles.

5.8 The Council is also preparing to release small sites, presently comprising surplus amenity grass, or vacant land, as building plots for self-builders.

**6.0 Implementation Monitoring and Review**

6.1 Monitoring of the measures and actions employed by the Council to stimulate housing delivery will continue to be assessed through the AMR (Authority Monitoring Report), and the Council's Starts and Completions exercise, internal quarterly reporting and reports.