

# **Redbridge Local Plan Authority Monitoring Report 2018-19**

**April 2020**

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## Executive Summary

During the 2018/19 monitoring period, the Council has made substantial progress in many areas, most notably in the adoption of key planning policy documents, Development Management's performance in the determination of planning applications, and the provision of new community infrastructure floorspace.

The Council adopted the Redbridge Local Plan (2015 – 2030) in March 2018 which provides a strategy for the borough that addresses and manages the borough's substantial planning challenges.

The Council however is facing some major challenges in meeting the targets for housing delivery and failure to demonstrate a five-year housing land supply (5YHLS). The Council is placing a significant emphasis on increasing overall housing supply in the borough and address this failure to deliver

Significant steps are being taken to increase housing with the production of The Ilford Prospectus and a Borough wide Housing Strategy. Ilford was designated a Housing Zone by the Mayor of London and the Greater London Authority (GLA) is providing additional funding to accelerate the delivery of at least 2,189 homes (including 553 affordable homes) in Ilford. The Council is working with several private sector developers to deliver new housing within the zone. The Horizon scheme of 122 new homes was completed in August 2018.

The Council is also building new traditional Council housing and undertaking projects via its own development company Redbridge Living.

The Council aims to facilitate regeneration in the borough and is seeking funding for various projects. The improvements to Ilford's Public Realm are being delivered as part of a phased approach along with a new Cultural Quarter as promoted in the Ilford Prospectus. The Council is in the early stages of developing new community hubs to provide a mixture of multi-functional community facilities and dwellings.

Work has begun on the new main station entrance and ticketing hall at Ilford Station, and a planning application has been submitted for a new southern entrance. In addition, significant progress has been made on step free access at six stations in the borough. These include improvements at Goodmayes and Seven Kings as part of Crossrail and Newbury Park (completed in 2018) on the Central Line.



# Introduction

## 1.1 What is the Authority Monitoring Report?

- 1.1.1 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), which sets the timetable for the preparation of future Local Plan documents. The AMR is also used to assess the performance and effectiveness of Redbridge's planning policies in delivering the key objectives of the Local Plan as well as wider corporate objectives.
- 1.1.2 Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012 states the detail the Authority Monitoring Report (AMR) must contain.

## 1.2 What is being monitored?

- 1.2.1 This AMR monitoring period covers the 2018 -19 financial year from 1st April 2018 to 31st March 2019 and provides information related to indicators both from the now superseded LDF and the Redbridge Local Plan (2015-2030).
- 1.2.2 There are six aspects of planning monitored in the AMR and these are as follows:
  - 1) Performance of the adopted Redbridge Local Plan 2015-2030, other plans and policies.
  - 2) Progress of Housing Delivery including affordable housing completions.
  - 3) Monitoring the effectiveness of the planning policies within the adopted Local Plan, comparing current performance against a range of indicators, highlighting where it is achieving targets and where it needs to improve in the future.
  - 4) Progress of key regeneration projects in the borough over the monitoring period.
  - 5) Monitoring how much the Council has received and spent in relation to the Redbridge Community Infrastructure Levy (CIL), Mayoral CIL, Section 106 and New Homes Bonus.
  - 6) Monitors Development Management and Enforcement teams' performance with regards to meeting targets for the handling of planning applications, appeals and enforcement decisions.
- 1.2.3 There are 26 key performance indicators from the previous LDF which are being reported on in the AMR 2018/19. has not occurred for some time due to a reduction in resources.

- 1.2.4 There are 56 separate Indicators to be reported on from the Redbridge Local Plan 2015-2030. It is important to note that many of the indicators have been grouped together in the report.

## 2 Local Plan and Planning Policy Update

### 2.1 Background

- 2.1.1 The Council has a responsibility to prepare an up-to-date spatial strategy and other relevant planning guidance to manage the future growth and development of the borough. Redbridge faces several planning challenges which include an increasing population, a growing housing need, a challenging housing target and providing the necessary infrastructure to support this growth.

### 2.2 Local Development Scheme

- 2.2.1 All local planning authorities are required to have a Local Development Scheme (LDS.) The Council's current LDS (2017-2020) provides a schedule for the preparation of individual planning guidance that the Council proposes to prepare and a summary of progress is provided for each document.

### 2.3 National and Regional Planning

- 2.3.1 As well as a new Local Plan, there have been significant changes to national and London-wide planning policy.
- 2.3.2 The revised National Planning Policy Framework (NPPF) was published in July 2018, and a final updated version published on 19<sup>th</sup> June 2019.
- 2.3.3 Key changes introduced within the new NPPF include a new focus on design policies, the expectation that viability is frontloaded at the plan-making stage standard methodology on calculating housing need; requirements for a percentage of housing need to be met from small sites (albeit using a threshold that is irrelevant to the London context); promotion of town centre diversification; an increased emphasis on compulsory purchase and land assembly powers; and continued green belt protection.
- 2.3.4 Additionally, a new Housing Delivery Test (HDT) was introduced with significant penalties for local authorities that significantly under-deliver on housing completions. The Council has produced a HDT Action Plan that outlines the current housing delivery statistics, and the key actions necessary within different service areas of the Council to increase housing delivery.
- 2.3.5 In London, the draft London Plan, published in November 2017, proposes a radical break from previous planning policy for London, with a significant focus on accommodating housing need through the intensification and redevelopment of small brownfield sites, especially in outer London. The Examination in Public ran from January to May 2019, with a further draft with consolidated changes published in July 2019.
- 2.3.6 The Planning Inspectorate's 'Report on the Examination in Public for the London Plan 2019' was published in October 2019 with several recommendations of the panel. The plan was submitted the Secretary of State in late 2019 with The Mayor of

London challenging several the recommendations of the panel. The adoption of the final plan is expected in May 2020.

## 2.4 Redbridge's Local Plan 2015-2030

- 2.4.1 The Local Plan was adopted at a meeting of the Full Council on 15th March 2018. This replaces the existing Core Strategy, Borough Wide Primary Policies, and Area Action Plans, but existing SPDs and SPGs will be retained until they are updated.

## 2.5 Review of Redbridge CIL Charging Schedule

- 2.5.1 Redbridge was the first London Borough to introduce a CIL charging schedule in 2012. This is charged at a flat rate of £70 per square metre (plus indexation) for all liable development. However, the vast majority of local authorities have different charging rates for different uses and locations; and Redbridge's charges are being reviewed in light of our Local Plan and the new infrastructure requirements identified in the Infrastructure Delivery Plan. A new Draft Charging Schedule was recently consulted upon and the responses are being reviewed and a report is due to be submitted to the Secretary of State in late spring 2020 with an examination and adoption of the new CIL Charging Schedule later in 2020.

## 2.6 Planning Obligations SPD

- 2.6.1 The Council has adopted a new Planning Obligations SPD in September 2019. This document updates the current Affordable Housing SPD to reflect changes in regional planning policy contained within the London Plan (2016), the Mayor's Affordable Housing and Viability SPG (2017), and at the local level in the Redbridge Local Plan 2015 – 2030. It provides guidance as to how affordable housing requirements will operate in Redbridge in relation to different types of schemes, as well as guidance regarding other planning obligations including open space and public realm, transport and highways, and environmental sustainability.

## 2.7 Housing Design Guide SPD

- 2.7.1 The Council has adopted a new Housing Design Guide SPD in September 2019. This supersedes the existing Householder Design Guide SPD (2012) document to reflect more recent guidance and the Redbridge Local Plan 2015 – 2030.

## 2.8 Conservation Area Appraisals

- 2.8.1 The Redbridge Local Development Scheme identifies 11 Conservation Area Appraisals (SPDs) to be completed by the end of autumn 2025. At present, 5 Conservation Area Appraisals have been adopted since 2013, with the most recent being Little Heath in 2018 and Aldersbrook in 2019. It is anticipated that the Conservation Area Appraisals for Wanstead Grove and Wanstead Village will be consulted upon and adopted by the end of 2020.

## 2.9 Article 4 Directions

- 2.9.1 The Council has introduced a non-immediate, borough-wide Article 4 Direction that restricts Permitted Development rights relating to small HMOs, which are defined as small shared houses occupied by between three and six unrelated individuals, who share basic amenities. This came into effect from 6<sup>th</sup> December 2019.
- 2.9.2 Redbridge has seen a significant expansion in the quantity of HMOs. This is linked to several factors, including population growth (both locally and across London) that exceeds new housing supply resulting in pressure to accommodate more people within the existing housing stock, the high cost of housing making renting a room in a shared house the only affordable option for many workers, and changes to Housing Benefit eligibility meaning that under-35s can only claim for a single room as opposed to a studio flat.
- 2.9.3 Conversion to HMOs can however result in increased parking, waste, noise, and pressure on local services; and therefore, the purpose of the Article 4 direction is to allow the Council to better manage the location and standards of houses and flats that are converted to small HMOs, by requiring planning applications to be made which will be assessed against criteria within the Local Plan.
- 2.9.4 Existing small HMOs are not affected by this change however, HMOs of all sizes are now required to be licenced in Redbridge, with minimum standards for room sizes, amenities, and health and safety.
- 2.9.5 The Council is currently developing a robust monitoring method to support an equalities impact assessment for the Article 4 direction. We will report on any impacts of the Article 4 direction on vulnerable groups in the next AMR for the 2019/2020 monitoring period.

## 2.10 Neighbourhood Planning

- 2.10.1 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 neighbourhood. Neighbourhood Plans are led and produced by an authorised local community organisation such as a parish or town council, or where one does not exist a Neighbourhood Forum may be designated. Neighbourhood Plans will be subject to consultation, examination and a referendum. Once adopted they form part of the statutory development plan alongside, and must be in general conformity with, the Redbridge Local Plan and London Plan. The Council will provide support and advice to any group which expresses an interest in Neighbourhood Planning.
- 2.10.2 The first stage in producing a neighbourhood plan is where a local group applies for the designation of a neighbourhood area and neighbourhood forum. The South Woodford Society's application for Neighbourhood Area and Forum designation was approved by Cabinet in 2020.

## 2.11 Self-build and Custom Housebuilding Register

- 2.11.1 The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) and the Self-build and Custom Housebuilding (Register) Regulations 2016 require the Council to keep a register of individuals and associations who wish to acquire serviced plots of land within Redbridge for those individuals and associations to build or commission their own homes. The Register was launched on 1<sup>st</sup> April 2016, and as of January 2019 there are a total of 36 individuals and one association who have registered an interest.

## 2.12 Duty to Cooperate

- 2.12.1 Section 110 of the Localism Act inserted section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A requires co-operation between local authorities, county councils and a range of other bodies as integral to the preparation of planning policy.
- 2.12.2 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 (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas”.
- 2.12.3 The duty to cooperate requires Local Planning Authorities to constructively and actively engage with relevant bodies, as part of an ongoing process, to maximise effective working on the preparation of development plan documents in relation to strategic matters. The Council has actively engaged neighbouring authorities and relevant bodies over the monitoring period, particularly through the development of the Redbridge Local Plan (2015-2030). The Council prepared a full statement on how it considered it has met the Duty to Cooperate as part of the Local Plan examination process. This can be viewed here:<https://www.redbridge.gov.uk/media/3043/lbr-114-duty-to-cooperate-statement-2017.pdf> 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.

## 3 Housing Delivery Housing Trajectory and Affordable Housing

### 3.1 Housing Delivery and Trajectory

#### Context

- 3.1.1 Redbridge has an overall annual housing target to provide an additional net 1,123 homes per year in accordance with the London Plan (2016). The 5-year housing target for the borough was to provide 5253 new homes from 2014/15 to 2018/19.
- 3.1.2 However, the Outer North-East London Strategic Housing Market Assessment (SHMA) 2016 estimated that an average of 2,287 additional homes per year is required to meet the housing needs across Redbridge, and the London Boroughs of Havering, Barking and Dagenham, Newham and Waltham Forest.
- 3.1.3 The Council monitors the number of approved housing units to ensure that there is a healthy pipeline of homes coming forward for development in the borough. Historically however, Redbridge has not approved the requisite number of homes to subsequently deliver enough housing, even with optimistic assumptions about permissions being built out.
- 3.1.4 The housing trajectory is based upon build out rates and estimates of when individual allocated housing sites have the potential to be completed with particular regard for what is deliverable in the next 5 years. It does not mean that the schemes will be developed or are likely to be developed in that timescale.
- 3.1.5 The housing trajectory includes the 5YHLS.

#### Performance

##### Indicator 1: Net Additional Dwellings over the plan period (2014-2019)

LDF Objective & Local Strategic Objective	Indicator	Target	Performance
<b>LDF SO7</b> <b>Local Plan SO1</b>	Net additional dwellings completed over the previous five-year period (2014 – 2019)	5253	2845

**Indicator 2: Net additional dwellings in the last financial year (2018/19)**

<b>LDF Objective &amp; Local Plan Strategic Objective</b>	<b>Indicator</b>	<b>Target</b>	<b>Performance</b>
<b>LDF SO7 Local Plan SO1</b>	Net additional dwellings for the current year (2018/19)	1,123 per year	764

3.1.6 As demonstrated by Indicator 1: Net Additional Dwellings over the plan period (2014-2019), in the last five years the Council has delivered 2845 homes of the minimum 5253, which is approximately 46% of the cumulative target. This is significantly below the required target.

3.1.7 As it can be seen from Indicator 2 in the last financial year, the Council has delivered a total of 764 new homes of the annual housing target of 1,123 new homes. This equates to 68% of the annual target.

**Table 1: Conventional Housing Completions (from start of plan period)**

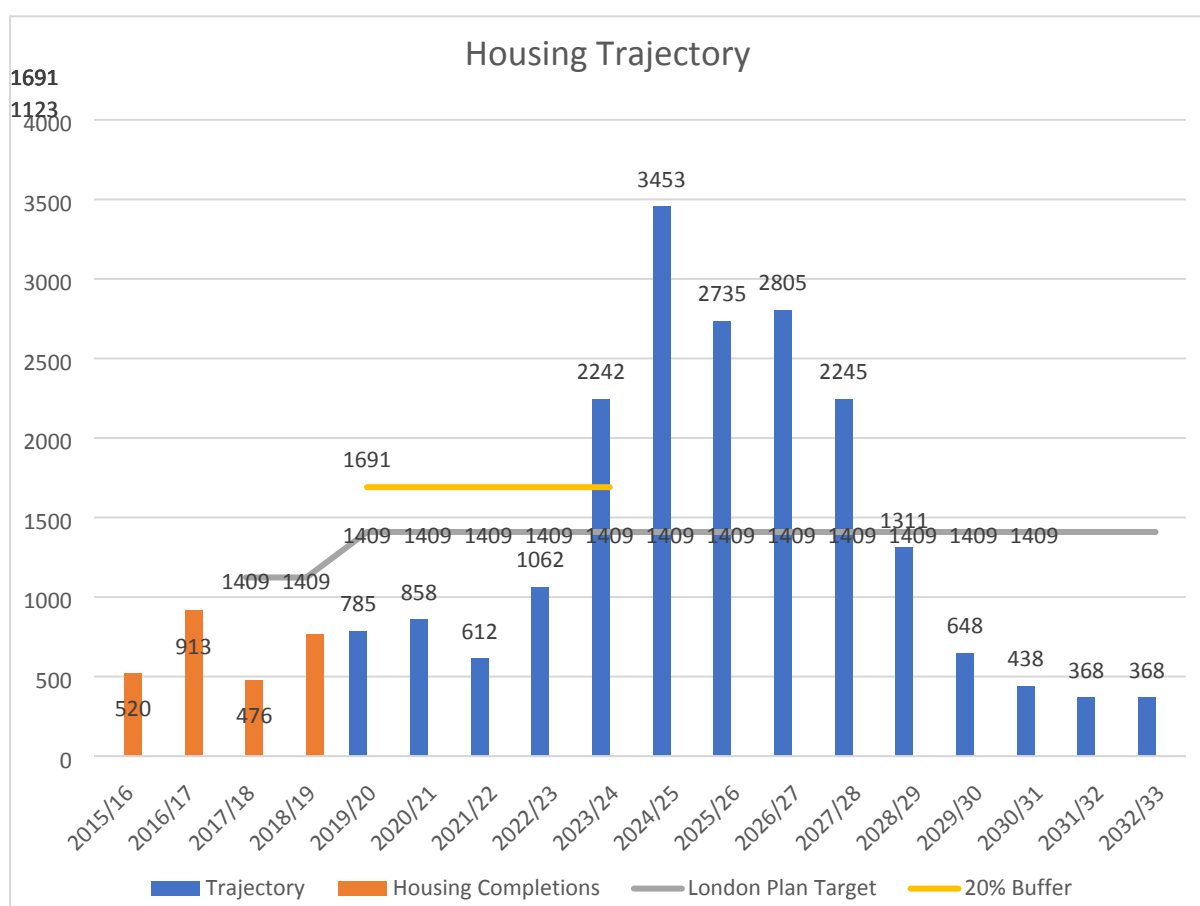
	2015/16	2016/17	2017/18	2018/19
<b>Completions by year</b>				
Completions (net)	520	913	476	764
Cumulative Completions	520	1,433	1,909	2,673
Cumulative Target	1123	2246	3,369	4,492
Performance Against Target	-603	-813	-1460	-1819
Cumulative completions as percentage of cumulative target (from 2015/16)	46%	64%	57%	60%

3.1.8 Whilst performance has remained below target, there has been an overall improvement in delivery during recent years, and it is expected that delivery will increase in 2019/20, based upon the expected completion dates of major projects currently under construction. Since 2015 (since start of plan period) we have increased annual delivery and completed a cumulative total of 60% of our target.



**Table 2: Housing Pipeline**

Pipeline statistics for 31 March 2019	Number of units
<b>Conventional housing – total pipeline of approvals</b>	3096
<i>Of which under construction</i>	1330
<i>Of which not started</i>	1766
<b>Non-conventional housing – total pipeline of approvals</b>	326
<i>Of which under construction</i>	126
<i>Of which not started</i>	200
<b>Units in lapsed permissions (2015 – 2018)</b>	53



**Figure 1: Redbridge Housing Trajectory Graph**

3.1.9 Our analysis shows that the Council is significantly below target for approving new homes; below target for the number of affordable housing completions, below target for the net number of additional dwellings completed, and at present estimates a 5YHLS of 4.9 years including the required 20% buffer. This means that the Council cannot demonstrate a five-year housing land supply (5YHLS) and

consistent under delivery will mean failing the Governments Housing Delivery Test (HDT).

**Indicator 3: Number of New Homes Approved in 2018/2019**

LDF Objective & Local Strategic Objective	Indicator	Target	Performance
<b>LDF SO7 Local Plan SO1</b>	Net additional dwellings approved 2018/2019	1,123 (completions target) plus buffer for lapsed or unimplemented schemes	917

- 3.1.10 Most of new homes approved are being built however half of the net units were accounted for by three planning permissions.
- 3.1.11 Application 4326/16 is at 193-207, High Road, Ilford for the development of a part 30, part 15, part 8 and part 10 storey building comprising: 290 residential apartments (including a mix of studio, 1, 2 and 3 bedroom units); 2,277.6sqm of flexible non-residential floor space comprising Classes A1-A3 at ground floor and B1 at first floor; podium landscaped amenity and play areas, including village hall at second floor; new basement comprising 32 disabled parking spaces, cycle storage, 482 cycle spaces and plant at first floor level.
- 3.1.12 Application 5988/16 is at 902-910, Eastern Avenue, Ilford, IG2 7HZ for the erection of part two, part three, part five, part seven, part eight and part twelve storey block containing 66x1, 87x2 and 24x3 bedroom flats (177 in total), with associated access, amenity space, landscaping, refuse storage and car and cycle parking.
- 3.1.13 Application 2694/18 is at 104, Manford Way, Chigwell, IG7 4D for the erection of part four, part five, part six and part seven storey building (69x1, 18x2, 14x3 and 4x4+ bedroom flats) with commercial and community floor space (A1/A3/B1/D1/D2). Internal courtyard, car parking, cycle storage, refuse store, landscaping and associated works.

## Conclusion

- 3.1.14 There are a large number of allocated sites within Redbridge (some of which have the potential for greater levels of housing than envisaged in the Local Plan), in addition to a mixture of large and small unallocated windfall sites however, there are a limited number of live planning permissions which impacts upon the amount of housing that is deliverable (for the purposes of the NPPF) next 5 years.
- 3.1.15 The number of homes approved in 2018/19 is less than the annual completions target. There is a pipeline of around 3,000 homes in approved schemes however given the typical time taken between an approval and a completion and a large proportion of consented schemes where development will not commence there needs to be an increase in the number of homes that are approved or under

construction at any given time is necessary to achieve our completions targets in the future.

- 3.1.16 Of these, as of 31st March 2019, there was a net pipeline of 3,096 conventional housing units with planning permission that had not been completed; of which 1,766 had not started and 1,329 were on schemes where at least some construction had started.
- 3.1.17 The pipeline of consented schemes forms part of the 5-year housing land supply. This pipeline is very tight, equivalent to less than 3 years' worth of the borough's housing requirement, and representing just 1.0% of London's pipeline of 298,884 net conventional housing units with consent. It does however reflect the fact that other boroughs have some very large outline planning consents, with very lengthy build-out periods. London had 121,883 homes yet to start and 177,001 on schemes under construction.
- 3.1.18 As the Council continues to be below target for approving new homes and below the target for the net number of additional dwellings completed in 2018/19, it will have difficulty in meeting the completions target in subsequent years. Therefore, the Council is predicted to fail the HDT in November 2020 and risks a "backlog" in its housing trajectory which will have to be addressed in subsequent years. The Council will also fail to meet the increased new London Plan housing targets.
- 3.1.19 Redbridge's Housing Delivery Test Result (covering the years 2016/17 to 2018/19) was 60% which means it had to produce an Action Plan and add a 20% buffer to its 5-year land supply. Continued poor performance would place Redbridge at risk of the presumption in favour of sustainable development, which in the future will apply to authorities scoring less than 75%. It will be much more difficult to refuse planning permission and developments that do not provide any community infrastructure or any benefit to the local area may have to be approved to meet the housing supply target.
- 3.1.20 The Council will update its position on the 5YHLS in the next AMR.

## 3.2 Affordable Housing Delivery and the Affordable Housing Programme

### Context

- 3.2.1 In line Mayor of London's threshold approach Redbridge has a strategic target for 35% of all new housing to be affordable.
- 3.2.2 Affordable housing must first be approved and form part of the pipeline of delivery for subsequent completions to occur so changes that might affect the ability to fund or build affordable housing will not be reflected in the mixture of housing completions for some years afterwards.
- 3.2.3 The emerging London Plan will set a strategic target for 50% of overall housing delivery to be affordable housing and 50% affordable housing on public land and industrial release sites. The threshold approach will be imbedded into policy, with

the intention to incrementally increase the threshold from 35% towards 50% over time.

- 3.2.4 The Local Plan target in relation to the affordable tenure split is 60% social/rented/affordable rented and 40% intermediate.

## Performance

**Table 3: Affordable Housing Delivery from start of plan**

Year	Number of Homes Built (Net)	Net Number of Affordable Homes	% Affordable Homes
<b>15/16</b>	520	98	19%
<b>16/17</b>	913	99	11%
<b>17/18</b>	476	122	26%
<b>18/19</b>	764	151	20%
<b>Cumulative Total</b>	<b>2673</b>	<b>471</b>	<b>18%</b>

- 3.2.5 As Table 3 demonstrates, this equates to the provision of 471 affordable homes. Over the monitoring period the number of affordable homes delivered annually has increased to a high of 26% in 2017/18 and then slightly decreased to 20% in 2018/19. The number of net affordable homes has increased to 151 in 2018/2019.

### Indicator 4: Affordable housing provision since the start of the plan period

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO7 &amp; SP8: Affordable Housing Local Plan SO1</b>	Affordable housing completions since the start of the plan period	35%	18%

- 3.2.6 In 2017/18 the number of affordable homes completed was higher than in previous years, in large part due to completions of shared ownership properties at Five Oaks Lane. In 2018/2019, the number of net homes completed was 37% more than the previous year and the net number of affordable homes increased by 24% in the same period. This figure only meets half of the required target on affordable housing.

**Table 4: Net number of units completed by tenure in 2018/19**

<b>Tenure</b>	<b>Number of units</b>	<b>Net percentage</b>
<b>Market</b>	613	80.2%
<b>Intermediate</b>	108	14.1%
<b>Social rented</b>	34	4.5%
<b>Affordable</b>	9	1.2%

**Table 5: Housing Completions Net Tenure 2015-2019**

<b>Tenure Type</b>	<b>Net Number of Homes</b>	<b>% Completed Homes</b>
<b>Market</b>	2203	82.4
<b>Intermediate</b>	210	7.9
<b>Social rented</b>	142	5.3
<b>Affordable rent</b>	118	4.4
<b>Overall affordable units</b>	(470)	(17.6)

- 3.2.7 Table 5 shows the breakdown of the completed affordable housing category into the different tenure types since the start of the Local Plan period. The results indicate that we are achieving a mix of different affordable tenures.
- 3.2.8 Within the combined affordable housing category, 29.5% was for social or affordable rent and 70.5% for intermediate housing this is a significant misalignment from the target split for 60% social rented/affordable rented and 40% intermediate housing. It should be noted that the overall delivery of both social/affordable rented and intermediate housing is below target.

**Table 6: Tenure, number of units and number of bedrooms breakdown for 2018/19**

Number bedrooms	of Total number of units	Tenure	Number
<b>1</b>	309	Market	289
		Intermediate	16
		Social rented	4
<b>2</b>	286	Market	243
		Intermediate	23
		Social rented	16
		Affordable rent	4
<b>3</b>	129	Market	53
		Intermediate	57
		Social rented	14
		Affordable rent	5
<b>4</b>	61	Market	54
		Intermediate	7
		Social rented	Net 0

- 3.2.9 The mix of units being delivered reflects the fact that most large development sites are close to town centres and stations more suited to higher densities; and the fact that larger properties are both more expensive and can be readily found on the market within the existing dwelling stock, assisted by the level of house extensions.
- 3.2.10 Whilst smaller units are needed by smaller households, it is important to ensure a diverse range of housing delivery, especially to cater for the significant need for family housing at affordable rent levels.

**Table 7: Completed Affordable Council Housing Schemes in 2018/19**

<b>Scheme Name</b>	<b>Date Completed</b>	<b>Number of Units</b>	<b>Project details</b>
<b>1-8 Peldon Close, Woodford Green, IG8 7FB</b>	10/04/2018	8	8 units (3 x 3 beds houses, 4 x 2 bed flats, 1 x 3 bed flat)
<b>1-9 Coppice Path Court, Coppice Path, Chigwell IG7 4AW</b>	18/6/2018	9	9 units (4 x 3 bed houses, 3 x 3 bed flats, 2 x 2 bed flats)
<b>3 Greystone Gardens</b>	01/01/2019	1	Completed and occupied
<b>7 Holstock Road</b>	24/09/2018	2	Completed and occupied
<b>45 Fernways</b>	22/06/2018	2	Completed and occupied

- 3.2.11 The Council's Housing Revenue Account programme completed 14 permanent affordable housing units completed in 2018/2019 which are further detailed in Table 7. There were 126 starts in 2018/19 across 6 sites in 2018/2019.
- 3.2.12 Additional to this, in 2018/19, the Council had a total of 18 new HRA housing projects, totalling 71 units at different stages in delivery. The total committed costs for these projects including additional homes and consultants' fees was £990,974. The projects are listed in Table 8.

**Table 8: New HRA Housing Projects 2018/19 by the Council**

Project Address	Number of Units
Liston Way	1
2 Knights Way	1
2a Knights Way	1
59 Eastwood Road	2
Orchard Estate	4
Beehive Court	-
Glade Court	-
Heathcote Court	-
Mossford Court	-
48 Tomswood Hill	1
Storage Area Ray lodge	1
271 Horns Road	1
Glade Court	1
Ryedale Court (Left)	26
Ryedale Court (Right)	22
Norman Road	8
The Whitings laundry Area	1
Owen Waters laundry Area	1

## Conclusion

- 3.2.13 The strategic target for affordable housing has not been met but a significant reduction in the level of grant funding from national and regional government has meant that the delivery of affordable housing is to a large extent reliant on cross-subsidy from market housing.
- 3.2.14 In addition, the Local Plan does not require any affordable provision on housing from schemes which deliver fewer than 10 unit and Government policy also does not require affordable housing to be provided in prior approval schemes such as office to residential conversions.
- 3.2.15 The Council has completed 14 affordable housing units as part of its Housing Revenue Account programme. The Council has a pipeline of sites suitable for



immediate and medium to long term developments subject to consultation with estate residents and leaseholders.

- 3.2.16 This low delivery of affordable housing is also linked to the low overall delivery with not enough market rate completions to cross-subsidise affordable housing.
- 3.2.17 To increase the level of affordable housing across the borough the Council is proactively working with the GLA and Registered Providers. The Council is committed to delivering 1000 new affordable homes by 2022. With the Building Council Homes for Londoners prospectus, the GLA has allocated £20million to the Council to deliver 200 new homes, and given authority to use right to buy receipts for a further 400 homes. This delivery is through the Housing Revenue Account (HRA) Programme and is in addition to the Redbridge Living schemes.
- 3.2.18 The Council is committed to start a minimum of 200 additional homes by March 2021 subject to confirmation of the design and size of each scheme.

### 3.3 Accessible Dwellings

#### Context

- 3.3.1 The Redbridge Local Plan introduced a new indicator to monitor new build housing relating to the numbers of M4(2) accessible dwelling completions and M4(3) wheelchair accessible dwelling completions. The targets are to deliver all new build housing as M4(2) or M4(3) accessible and to deliver at least 10% of new build housing for M4(3) wheelchair users.
- 3.3.2 During the 2018/19 monitoring period, legislation relating to accessible housing changed which resulted in the Lifetime Homes Standard being superseded by the requirements for M4(2) and M4(3). This 2018/2019 AMR splits the reporting on the number of accessible dwelling completions accordingly.

#### Performance

**Table 9: Lifetime Homes and M4(2) and M4(3) compliancy in the 2018/19 period (100% new build schemes only)**

Standard Used	Total New Build units	Lifetime or M4(2)	Lifetime or M4(2) %	Wheelchair or M4(3)	Wheelchair or M4(3) %
Lifetime Homes / Wheelchair	222	173	77.9	2	0.9
M4(2) and M4 (3)	120	89	74.2	8	6.7
Total	342	262	76.6%	10	2.9%

#### Conclusion

- 3.3.3 The low figures are due to the fact that some permission types do not require accessible standards such as prior approvals, some scheme types such as

conversions / extensions to existing properties do not allow it and schemes of under 10 units do not yield any M4(3) units.

3.3.4 The Council is trying to address the issue of low wheelchair accessible housing.

## 4 Local Plan Performance against indicators

### 4.1 Dwelling Conversions, Change in Employment Land and Housing completions on employment land

#### Context

- 4.1.1 Redbridge is strategically located within the two growth corridors of the Thames Gateway and the London-Stansted-Cambridge growth corridor. The Council will seek to maximise the benefits of this position to attract investment into the borough and encourage greater job growth.
- 4.1.2 In comparison to the rest of London, Redbridge has a small supply of employment land (note that employment land is typically “light industrial” and does not include locations primarily for offices or retail). The borough has approximately 59.78 hectares of employment land, of which 42.4 ha is designated and 17.38 ha is non-designated land (over 0.25ha).
- 4.1.3 Industrial land uses continue to make a valuable contribution to local employment and provide important local services. The Council recognises the role these play in providing a suitable range of jobs and acting as locations in the borough for jobs.
- 4.1.4 The number of housing completions on employment land is a new indicator for monitoring in the Redbridge Local Plan.
- 4.1.5 Employment land falls within the use classes from B1 to B8. B1 floorspace is for offices and some light industry (there are sub-classes of B1a, B1b and B1c), B2 floorspace is for general industry, and B8 floorspace is for storage and logistics. B3 to B7 are former categories no longer used.

#### Performance

##### Indicator 5: Change in B1-B8 floorspace 2015-19 since plan period

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO5</b> <b>Local Plan SO1</b>	Change in floorspace by type (2015-19)	Total: 2,500 m <sup>2</sup> new floorspace, B1 – B8	Loss of 15,579 m <sup>2</sup> B1 – B8 floorspace

- 4.1.6 It was anticipated that over the monitoring period there would be an increase in the amount of new employment floorspace in the borough. However, as Indicator 5 sets out has been a net decrease of 15,579 m<sup>2</sup> of all employment floorspace.

**Table 10: Employment completions by year (2015-19)**

<b>Year</b>	<b>B1</b>	<b>B2</b>	<b>B8</b>	<b>Total</b>
<b>2015/16</b>	-18,095	0	-872	-18,967
<b>2016/17</b>	-7,808	-13,000	-168	-20,976
<b>2017/18</b>	-6,638	-109	-2,187	-8,934
<b>2018/19</b>	-14,871	-1,696	988	-15,579
<b>Total</b>	-47,412	-14,805	-2,239	<b>-64,456</b>

## Conclusion

- 4.1.7 The net loss in employment (B1-B8) floorspace follows a common trend with the rest of London, as the borough manages the impacts of globalisation, mechanisation and the creation of industrial parks beyond the capital's boundaries.
- 4.1.8 The main reason for the decrease in B1 (office) floorspace is due to changes made by central Government which now means that a change of use from office (B1 use class) to housing (C3 use class) can be undertaken without the need to gain planning permission from the Council. Such applications are now considered through the Prior Approval process.
- 4.1.9 This weakens the Council's ability to manage the borough's existing employment floorspace, as the principle of change of use to housing is now established. Essentially, the majority of the B1 floorspace which has been lost in the borough is as a result of changes of use from office space to housing led development. Within the 2018/19 period a total of 14,871m<sup>2</sup> of B1 floorspace was lost.
- 4.1.10 A significant amount of employment in the borough takes place in business areas outside the town centres. The London Plan (2016) seeks the protection of these business areas, and has designated these as Strategic Industrial Locations (SILs). There are two SILs in the borough at Hainault Business Park and Southend Road Business Area (including the Woodford Trading Estate). The London Plan policy advocates the protection of SILs in recognition of the role such developments play in the economy. The Council will continue to protect and enhance these locations to ensure they are maintained as the best employment locations in the borough.

## 4.2 Dwelling density

### Context

- 4.2.1 The percentage of approved new dwellings completed with densities in dwellings per hectare is a new indicator for monitoring in the Redbridge Local Plan 2015-2030.

## Performance

**Table 11: Number and percentage of approved new units within, above and below the London Plan's density matrix range in 2018/19**

<b>Conformity with Density Matrix</b>	<b>Number of Units</b>	<b>Percentage of Units</b>
<b>Within London Plan's density matrix</b>	274	27%
<b>Above London Plan's density matrix</b>	706	69%
<b>Below London Plan's density matrix</b>	37	4%

- 4.2.2 In 2018/19, 98.1% of total units were over 50 dwellings per hectare. This figure is slightly less than the density of Victorian terraced housing and reflects fairly typical densities of historic pre-existing housing. The average density of residential approvals was 159 dwellings per hectare in 2018/19.
- 4.2.3 From Table 10 we can see that the greatest percentage (69%) of approved new units fell above the London Plan's density matrix range.

## Conclusion

- 4.2.4 The Council approved a higher percentage (69%) of new homes that fell above the London Plan's density matrix range. This is in line with the densification strategy in the Local Plan.
- 4.2.5 It is important to note that the density matrix only considers the overall number of dwellings and excludes habitable rooms in the analysis. It also considers historic data for PTAL values which have since increased or are expected to increase over time due to improvements in public transport services. It also fails to capture the change in character of areas over time.

## 4.3 Specialist Accommodation

### Context

- 4.3.1 The number of specialist accommodation units (which contains an element for care provision) is a new indicator to be reported on by the Redbridge Local Plan 2015-2030.

### Performance

- 4.3.2 The net number of approved C2 bedrooms for 2018/19 was 15. The net number of completions of C2 bedrooms was 45 in the 2018/19 reporting period which is all from planning application 5128/16 for a 45-bedroom care home for children/young adults at the Granton, 515-519 Green Lane, IG3 9RH.

## Conclusion

- 4.3.3 This is a new monitoring indicator and therefore difficult to draw any meaningful conclusions from this at present.

## 4.4 New Homes in multiple occupation

- 4.4.1 Houses in Multiple Occupation (HMO's) are where a single house (or self-contained flat) is inhabited by three or more people forming two or more households, who share basic amenities such as cooking and washing facilities.
- 4.4.2 Unlike other areas of the country where HMO's are often associated with university students, housing pressures in London are so great that for many Londoners HMOs are the only housing option which they can reasonably afford on modest incomes.
- 4.4.3 HMOs meet a genuine need and are an efficient use of dwelling stock. However in some cases, the properties concerned are inadequate to be used as HMOs without being detrimental to their inhabitants or their immediate neighbours.
- 4.4.4 In parts of inner London HMOs are under pressure from being converted into larger self-contained flats or back to single family dwellings for a prime residential market, resulting in the loss of cheaper accommodation. Simultaneously, in outer London, HMOs have grown, in part due to underlying housing need, but also because they offer far higher gross yields to landlords than letting out housing to single households.
- 4.4.5 To this end, the Council has recently (December 2019) confirmed an Article 4 Direction, with the effect of requiring future changes of use from a dwelling to an HMO of between 3 and 6 residents to have planning permission. Existing HMOs are not affected by this requirement. The existing requirement for HMOs of seven or more residents to have planning permission remains.
- 4.4.6 The Council requires all HMOs of 3 or more residents to be licenced – this is a separate requirement to planning permission and is primarily focused on health and safety, property management, and ensuring there is adequate space within the HMO. The register of licenced properties is one way of monitoring the number of HMOs, however across London it is estimated that 75% of HMOs are unlicensed.
- 4.4.7 The Council has developed a Tenure Intelligence Model (TIM) that uses intelligence such as the number and turnover of registered voters, taxpayers, benefit claimants, etc; to establish the probability of whether a property is an HMO. The unlicensed properties flagged as having a high probability of being an HMO can then be investigated manually and with a site visit.
- 4.4.8 At present, however, the TIM does not have information over a sufficient length of time to accurately determine the overall number of HMOs and whether this is an increasing trend.

## 4.5 Retail & Commercial Floorspace

### Context

- 4.5.1 The Retail Capacity Study (2015) found there was scope for 23,911 - 39,851 m<sup>2</sup> net sales area of comparison retail floorspace, and 8,562 – 17,071 m<sup>2</sup> net sales area of convenience retail floorspace. After converting net sales area to gross floor area, this equates to approximately 46,390m<sup>2</sup> of A1 use class retail floorspace over 15 years, or 3,100m<sup>2</sup> per year. National and regional trends show a decline in commercial/retail floorspace.

### Performance

**Indicator 6: Change in Commercial Floorspace (A1-A5 uses) 2015-2019 over the plan period**

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
LDF SO5 Local Plan SO1	Change in floorspace by type	Total: A1- A5: increase in 6,750m <sup>2</sup>	A1-A5 – net loss of 2,232m <sup>2</sup>

**Table 12: Changes in Commercial Floorspace - net change over plan period from 2015- 2019**

Completions with changes in floorspace by Use Class	Annual Target	2015/16	2016/17	2017/18	2018/19	Cumulative Total from 2015- 2019
<b>A1 Retail</b>	3,500m <sup>2</sup>	-688	75	-1304	2,162	245
<b>A2 Financial and Professional Services</b>	1,250m <sup>2</sup>	0	121	30	-45	106
<b>A3-A5 Food and Drink</b>	2,000m <sup>2</sup>	-96	345	-952	-1,880	-2,583
<b>Total A1-A5</b>	6,750m <sup>2</sup>	-784	541	-2,226	237	-2,232

**Table 13: Town Centre Approvals by Use Class**

Year	Net Floor area (m <sup>2</sup> ) approved	A1 shops and retail	A2 professional services	A3 food and drink	A4 drinking establishments	A5 hot food takeaway
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Year	Net Floor area (m <sup>2</sup> ) approved	A1 shops and retail	A2 professional services	A3 food and drink	A4 drinking establishments	A5 hot food takeaway
2017/18	21,257	22,112	-397	288	-635	-111
2018/19	-23,599	-22,164	-325	516	-1,393	-233

## Conclusion

- 4.5.2 There has been a substantial net loss in commercial floorspace since the start of the monitoring period. In 2018/19, this is largely attributable to the Harrison Gibson development site proposing a mixed-use development providing dwellings, A1-A3 and B1 floorspace. The Council will continue to work with retail and other service providers to encourage implementation of these schemes and encourage further investment and improvement in the quality of the borough's town centres.

## 4.6 Retail/ Leisure Floorspace

### Context

- 4.6.1 The Council aspires to deliver new leisure facilities in the borough. Vacancy levels are a good general indicator of the health of a town centre. The Town Centre Health Check with a retail vacancy rates survey has not occurred for some time therefore we are unable to report on this fully at this stage.

### Performance

#### Indicator 7: Change in D2 (Leisure) Floorspace

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO8</b> <b>Local Plan SO1</b>	Use Class D2 (Assembly and Leisure) Amount of floorspace approved and percentage delivered in town centres.	Net increase and majority delivered in town centres	Net decrease in 2018/19 by 1249m <sup>2</sup>



- 4.6.2 As Indicator 7: Change in D2 (Leisure) Floorspace sets out, the borough has seen a decrease in the level of leisure floorspace delivered, by 1249m<sup>2</sup> over the monitoring period.
- 4.6.3 The loss of D2 floorspace relates to the completion of a scheme in the monitoring year that was approved in 2011. This involved the demolition of a banqueting suite and bowling alley. The relevant planning application reference number is 2483/10 for Carlton House in High Road Ilford.

## Conclusion

- 4.6.4 The next AMR report will contain details of the impact of any loss of retail once an updated Town Centre Health Check is completed.

## 4.7 Previously Developed Land

### Context

- 4.7.1 National, regional and Local Plan policy seek to direct new development to previously development land (brownfield land). In the London context, practically all land is either currently or previously built upon, or protected from development as designated open space, MOL or Green Belt.

### Performance

#### Indicator 8: Percentage of dwellings on previously developed land

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO1&amp;SO7</b> <b>Local Plan SO1</b>	Previously Developed Land % of new and converted dwellings on previously developed land	96%	100%

- 4.7.2 The completions which were not on previously developed land comprise of housing on residential gardens, which is excluded from the definition of brownfield land by the Government in the NPPF, but is allowed by local policy in some circumstances. A small number of garden developments fall outside of the definition of "garden land" from the NPPF.
- 4.7.3 It should be noted that Five Oaks Lane, whilst within the Green Belt, is counted as previously developed, as the proposal reflects the footprint of previously existing structures.

## Conclusion

4.7.4 The Council is surpassing its target for dwellings on previously developed land.

## 4.8 Temporary Accommodation

### Context

- 4.8.1 The Council has a statutory duty to assist homeless persons and prevention under the Homelessness Reduction Act. In 2017/18 the Council worked on preventing homelessness for over 1700 households before the introduction of the HRA.
- 4.8.2 The target for Redbridge is to reduce the number of households in temporary accommodation. In the 2017/18 monitoring period, there were 2295 households in temporary accommodation. London boroughs have a significantly worse homelessness problem than the rest of England. Figures for the end of March 2019 show that in England excluding London, 1.44 per 1,000 households were in Temporary Accommodation (TA). In London this was 16.02 per 1,000 households.
- 4.8.3 Whilst rough sleeping is the most visible form of homelessness, the vast majority of homeless households within Redbridge are within Temporary Accommodation.
- 4.8.4 Redbridge has low levels of social housing stock (both Council owned and with Registered Providers) in comparison with other boroughs. There are a total of 4,457 Council owned properties – the lowest of any borough except the City of London – against a total of 5563 applicants on the Housing Register (Oct 2019). This means Redbridge has a reduced ability to house the statutory homeless within its own property, meaning in some cases out of borough placements are the only available option, aside from temporary accommodation.

### Performance

#### Indicator 9: Households in Temporary Accommodation

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO4&amp; SO7 Local Plan SO1</b>	Number of households living in temporary accommodation	Reduce number of households in temporary accommodation.	2418 households at the end of March 2019 which was an increase of 123 households from the previous reporting period.

- 4.8.5 At the end of March 2019, there were 2418 Redbridge households in temporary accommodation which was an increase of 123 from the previous year. Recent

developments include the Council's purchase / procurement of its own temporary accommodation, consisting of both new and refurbished accommodation, both to increase overall supply and reduce the use of costly bed and breakfast accommodation and out of borough placements, and also to ensure that it has direct control over the quality provided.

## Conclusion

- 4.8.6 London boroughs have an increasing homelessness problem which includes Redbridge. The Council has low levels of social housing stock (both Council owned and with Registered Providers) in comparison with other boroughs. It is procuring its own temporary accommodation, consisting of both new and refurbished accommodation, both to increase overall supply and reduce the use of costly bed and breakfast accommodation and out of borough placements, and also to ensure that it has direct control over the quality provided. The Council has established Roding Homes which aims to purchase 300 homes on the open market to further increase the housing supply to prevent and reduce homelessness. The Council is participating in Capital Letters, a Pan London Temporary Accommodation Procurement project which will allow temporary accommodation to be sourced through a joint vehicle with other boroughs.
- 4.8.7 The best and most sustainable long-term solution for households in temporary accommodation is to increase the overall supply of affordable housing at genuinely affordable rents by the Council and Registered Providers; however, government funding priorities and continued Right to Buy losses make this challenging.

## 4.9 Empty Properties

### Context

- 4.9.1 Empty properties represent a significant waste of resources when the borough is experiencing high housing demand. The performance indicator target is for a year on year reduction on the number of residential properties empty for six months (long term empty properties). In October 2017 the figure was 462.

### Performance

#### Indicator 10: Number of empty residential properties

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
LDF SO1 Local Plan SO1	Number of residential properties empty for six months	Year on year reduction	Decrease by 5 from 462 in October 2017 to 457 in October 2018.

- 4.9.2 The number of overall empty properties decreased by 5 from 462 in October 2017 to 457 in October 2018. The number of empty properties returned to use through Council action totalled over 120 in 2018/19.
- 4.9.3 Long term vacant homes represent a mere 0.4% of the borough's overall housing stock, a rate significantly less than is the case for commercial property. Table 16 shows the number of empty properties returned to use through Council action in each year. Whilst the Council has legal powers in relation to long term vacant dwellings, in most cases informal action can yield results.
- 4.9.4 Note that vacant properties brought back into use are not counted as contributing to net completions, this is due to the low level of vacant property in Redbridge and to avoid double counting (where properties returning to use are counted as a gain, but properties becoming vacant are not counted as a loss).
- 4.9.5 Empty Property Grants may be used where a property has fallen into disrepair and expenditure is required to make it habitable. Typically, this will be in exchange for the Council being granted a five-year fixed term lease on the property and using it to house those on the housing register. However, no grants were completed in the 2018/19 financial year and the Empty Property Grant was refreshed at the February 2019 Cabinet.

**Table 14: Empty properties returned to use through Council action**

Year	2014/15	2015/16	2016/17	2017/18	2018/19	Conclusion
<b>Empty Properties returned to use</b>	<b>71</b>	<b>109</b>	<b>107</b>	<b>71</b>	<b>120 +</b>	

4.9.6 Proactive work by the Council has led to the decrease the overall number of empty properties in the reporting period with over 120 empty properties returned to use through Council action.

## 4.10 Work Redbridge

### Context

- 4.10.1 Work Redbridge is the Council's service to provide information, advice, and guidance to Redbridge residents seeking to enter work, training, volunteering, or self-employment.

### Performance

- 4.10.2 In 2018/19, the Council gave impartial information, advice, and guidance to an increased number of 797 people from 694 people in the previous year. 159 residents received support to update and review their CV/ covering letter. In addition, Work Redbridge has supported 25 employers to create apprenticeships. It helped create

30 apprenticeships and helped 18 residents into apprenticeships. Work Redbridge helped 178 residents into work.

## Conclusion

4.10.3 Overall, Work Redbridge has successfully assisted more people than the previous years.

## 4.11 Employment and Jobs

### Context

4.11.1 A new Local Plan indicator to monitor the number of jobs within a 45 minute public transport journey of each local centre and town centre has been introduced in the Redbridge Local Plan 2015/2030. The target is to provide an annual increase in the number of jobs available within 45 minutes of each local centre and town centre which should contribute towards Strategic Objective 2: Promoting a Green Environment by reducing the dependence on private vehicle usage, thus minimising greenhouse gas emissions and improving air quality.

### Performance

4.11.2 Table 15 displays data obtained from Transport for London's online Time Mapping (TIM) WebCAT planning tool. It is important to note that the data in Table 17 are estimates based on Transport for London's analysis and strategic forecasting tools which use baseline data not updated since 2011.

**Table 15: Estimated number of jobs within a 45 minute public transport journey of Metropolitan Centres, District Centres and Local Centres in Redbridge as measured at the AM peak (Data obtained from TfL's WebCAT planning tool)**

<b>Metropolitan Centre/ District Centre/ Local Centre</b>	<b>Estimated Number of Jobs</b>
<b>Ilford Metropolitan Centre</b>	1,512,513
<b>Barkingside District Centre</b>	189,373
<b>Chadwell Heath District Centre</b>	516,080
<b>Gants Hill District Centre</b>	822,875
<b>South Woodford District Centre</b>	602,446
<b>Wanstead District Centre</b>	1,489,735
<b>Green Lane Local Centre</b>	821,249
<b>Goodmayes Local Centre</b>	966,262
<b>Ilford Lane Local Centre</b>	777,843
<b>Manford Way Local Centre</b>	117,116
<b>Seven Kings Local Centre</b>	654,639
<b>Woodford Bridge Local Centre</b>	75,289
<b>Woodford Broadway Local Centre</b>	515,583
<b>Woodford Green Local Centre</b>	117,172

## Conclusion

4.11.3 The trend in the estimated number of jobs within a 45 minute public transport journey from the metropolitan/district/local centre will be reported on in the next AMR for 2019/2020.

## 4.12 Gypsies and Travellers

### Context

4.12.1 In accordance with both national and regional policy the Council will plan to meet the needs of the Gypsy and Traveller community. The Council recognises that Gypsy and Travellers form part of the borough's diverse community and providing them with right type of housing will help tackle inequality and help create strong and sustainable neighbourhoods.

4.12.2 At present, there is a single gypsy and traveller site within the borough, which is a Council owned site called North View Caravan Site, on Forest Road, Hainault.

## Performance

### Indicator 11: Number of Gypsy and Traveller pitches

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO7 Local Plan SO1</b>	Number of Gypsy and Traveller pitches	Maintain the number of Gypsy and Traveller pitches	Increase in the number of pitches to 17 between 2018 -2019.

4.12.3 As of January 2019, the total number of pitches increased to 17, however since July 2019 this has decreased down to 16 pitches.

## Conclusion

4.12.4 The Council produced a Gypsy and Traveller Accommodation Assessment (2016), which identified a total need for 7 additional pitches over the next fifteen years. It is envisaged that these additional pitches could be provided at the existing site on Forest Road. Therefore, there is no need, at this stage, to provide additional sites to meet the future needs of the Gypsy and Traveller community.

## 4.13 Hotels

### Context

4.13.1 The number of hotels is a new monitoring indicator introduced by the Redbridge Local Plan.

### Performance

4.13.2 There were total number of 54 hotels, boarding and guest houses, bed and breakfasts (under the C1 use class), and youth hostels (sui generis use class) in the borough in the 2018/19 monitoring period.

### Conclusion

4.13.3 As this is a new performance indicator the trends will be reported on in the next AMR.

## 4.14 Heritage at Risk, Listed Buildings, Conservation and Urban Design

### Context

- 4.14.1 The Local Plan promotes good design in all new development schemes. And seeks to ensure that development makes a positive contribution to place-making and local distinctiveness.
- 4.14.2 Buildings, parks, gardens, and areas with special historic, social, or architectural characteristics may receive a local or national designation that provides varying levels of legal and policy protection against damaging changes to those assets.
- 4.14.3 The Heritage at Risk Register lists heritage assets including listed buildings or scheduled monuments that are at risk of loss or damage as a result of neglect, decay, or inappropriate development, or are vulnerable to becoming so.
- 4.14.4 Redbridge has a total of 16 Conservation Areas, each designated due to their special architectural or historic interest. These have some additional planning restrictions, that can be further restricted through the use of Article 4 Directions.
- 4.14.5 The performance indicator with respect to listed buildings is for planning/listed building consent applications to be approved in accordance with the advice of Historic England. This indicator is monitored through the application of Local Plan Policy LP33: Heritage on planning/listed building consent applications and consultation of Historic England.

### Performance

#### Indicator 12: Heritage Assets at Risk 2018/19

LDF Objective & Indicator Local Plan Strategic Objective		Target	Performance
<b>LDF SO3</b> <b>Local Plan SO3</b>	Protecting Heritage Assets Number of heritage assets at risk (Source: Historic England)	Historic assets at risk to be kept under 10.	Total of 9 historic assets at risk .

- 4.14.6 The Council has proactively worked with the owners of listed buildings to resolve potential issues before buildings are designated as buildings at risk. By taking proactive action, it resolves those properties subject to designation as buildings at risk.
- 4.14.7 The Register contains a total of nine assets in Redbridge as of 2019, consisting of three Conservation Areas (one also a Registered Park and Garden), and five Listed Buildings. Table 16 contains the list of assets which are considered to be at risk and the steps being undertaken to resolve the condition of these assets.

**Table 16: Heritage at Risk Assets in Redbridge**



Heritage Asset	Type	Condition	Actions Undertaken / Planned
<b>Bungalow Estate</b>	Conservation Area	Very bad	Replacement Article 4 direction came into force January 2019 and supplemented by new design guidance
<b>Wanstead Park</b>	Conservation Area and Registered Park and Garden Grade II* [counted twice in Register]	Very bad / Extensive significant problems	Updated Parkland plan being drafted, Anticipated consultation, adoption and implementation expected in 2025.
<b>Woodford Bridge</b>	Conservation Area	Very bad	Character Appraisal and Management Plan adopted 2014. Public realm improvements delivered on site (funded through TfL Local Implementation Plan).
<b>Church of St Mary, Overton Drive, Wanstead E11 - Redbridge</b>	Listed Building Grade I	Poor	Recently added to list, first phase of repair part funded by Heritage Lottery Fund took place in 2018. Wanstead Parish has consulted church attendees on future options for ongoing management and has sought to apply for "festival church" status.
<b>Garden Temple in garden of Temple House, 14, The Avenue, Wanstead E11</b>	Listed Building Grade II*	Very bad	Extensive repairs to the roof and one of the columns have been carried out; further repairs required to columns. Feasibility study commissioned by Historic England, funding options being considered.
<b>The Grotto, Wanstead Park</b>	Listed Building Grade II	Poor	Survey commissioned by City of London in 2017 to explore scope of works required to preserve historic asset.
<b>Dr Johnson public house, Longwood Gardens, Ilford</b>	Listed Building Grade II	Poor	Urgent Works Notice Served May 2017, substantial progress made since to make building envelope weatherproof and watertight. External hoardings installed around site to limit further damage and vandalism. Planning Permission and Listed Building Consent for conversion to retail store and flats and development of houses in former car park, granted November 2017; discharge of conditions applications granted August 2018. Works have commenced on-site and main building now occupied by retail operator but upper floors not yet occupied for residential use.
<b>831, High Road, Ilford</b>	Listed Building Grade II	Poor	Listed Building Consent (application 5340/16) refused late 2017. Negotiations undertaken with property owner.
<b>6-8, High Street, Wanstead, E11</b>	Listed Building Grade II	Very bad	Replacement Planning Permission and Listed Building Consent granted on 1 <sup>st</sup> August 2018,

Heritage Asset	Type	Condition	Actions Undertaken / Planned
			works to restore and extend property for residential use commenced on-site.

4.14.8 Since 2013/14, one listed building has been removed from the list of Heritage at Risk assets following repair works funded largely through a grant from Historic England (The High Stone, Woodford Road, Leytonstone E11). Three have been added (6 and 8, High Street, Wanstead E11, Church of St Mary, Overton Drive, Wanstead, E11 and 831, High Road, Ilford). One Conservation area (The Bungalow Estate, previously known as Mayfield) has been added to the list.

#### Indicator 13: Number of Heritage Assets

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO7</b> <b>Local Plan SO3</b>	Number of the following:	Maintain or increase the number of entries in each heritage asset type.	
	Statutory Listed Buildings by Historic England		141 (increase)
	Statutory Listed Parks/ Gardens by Historic England.		2 (no change)
	Designated Conservation Areas by LBR.		16 (no change)

4.14.9 During the 2018/19 monitoring period, a total of 2 listed building consent applications were granted with conditions attached in accordance with the advice of Historic England. This indicator is monitored through the application of Local Plan Policy LP33: Heritage on planning/listed building consent applications and consultation of Historic England. The applications were 0355/18 Redbridge Town Hall, 128-142, High Road, Ilford, IG1 1DD; and 3897/18 73, Hollybush Hill, Wanstead, London, E11 1PE.

4.14.10 There has been an increase in the number of statutory listed buildings and gardens/parks to 143 in the reporting period. The three new additions were Wanstead War Memorial, the Former gatekeeper's lodge to Wanstead Infant Orphan Asylum (now Snaresbrook Crown Court) and the former Indoor Swimming Pool to Wanstead Infant Orphan Asylum. Further information on the newly added assets are listed in Table 17. The number of designated conservation areas has remained the same at 16.

**Table 17: New assets added to Statutory Listed Buildings List in 2018/19**

<b>Asset</b>	<b>Details</b>
<b>Wanstead War Memorial</b>	<p><b>Listed at Grade II</b></p> <p>Historic interest: An eloquent witness to the tragic impact of world events on the local community, and the sacrifices it made in the conflicts of the C20.</p> <p>Architectural interest: For the elegant and finely-modelled figure of winged Victory by Newbury Abbot Trent, a notable sculptor of the early C20.</p>
<b>Former gatekeeper's lodge to Wanstead Infant Orphan Asylum (now Snaresbrook Crown Court)</b>	<p><b>Listed at Grade II</b></p> <p>Historic interest: The gatekeeper's lodge to one of England's foremost infant orphanages, which received the highest patronage and illustrated changing attitudes to child welfare in early Victorian England, before being transformed into the largest stand-alone crown court centre in the country in the late C20.</p> <p>Architectural interest: A gatekeeper's lodge and bailiff's residence built in about 1841, which survives well with a largely unaltered exterior; * as a carefully-detailed building in high quality materials, which forms a good composition and reflects the architectural quality of the former orphanage building (Snaresbrook Crown Court in 2019).</p>
<b>Former Indoor Swimming Pool to Wanstead Infant Orphan Asylum</b>	<p><b>Listed at Grade II</b></p> <p>Historic interest: An indoor swimming pool to one of England's foremost orphanages, which received the highest patronage and illustrated changing attitudes to child welfare in early Victorian England, before being transformed into the largest stand-alone crown court centre in the country in the late C20.</p> <p>Architectural interest: An indoor swimming pool purpose-built in about 1880 to serve a Victorian orphanage, which survives well both externally and internally.</p>

**Indicator 14: Number of Conservation Areas with up to date Character Appraisals**

<b>LDF Objective &amp; Local Strategic Objective</b>	<b>Indicator</b>	<b>Target</b>	<b>Performance</b>
<b>LDF SO3 Local Plan SO3</b>	Number of Conservation Areas with an up to date (produced or reviewed within the last 5 years) Character Appraisal in place.	Increase number of Conservation Areas with up to date Character Appraisals.	Woodford Broadway (Adopted 2013) Woodford Bridge (Adopted 2014) Bungalow Estate (Adopted 2014) accompanied by draft design guidance 2017 Little Heath (Adopted 2018) Aldersbrook Draft Character Appraisal and Design Guide due for consultation in January 2020

4.14.11 In December 2017, a draft Design Guide for the Bungalow Estate Conservation Area was published for consultation, alongside making a draft (replacement) Article 4 direction; (non-immediate) that removes certain permitted development rights in respect to householder alterations. This is with the intention that the Conservation Area may be able to be removed from the Heritage at Risk register in the future if these measures are effective. The replacement Article 4 direction was confirmed in January 2019.

4.14.12 Additionally, in December 2017, a draft Character Appraisal and Management Plan SPD for the Little Heath Conservation Area was published for public consultation. A final version of the SPD was adopted in September 2018.

## Conclusion

4.14.13 There were a total of 9 at risk historic assets on the register which met the target. The number of statutory listed buildings in 2018/19, successfully increased by three to 141.

4.14.14 Officers have been working with Historic England to resolve some of the items on the Heritage at Risk (HAR) register and two cases which have been problematic are 6-8 High Street, Wanstead and Dr Johnson, Barkingside. Due to the work that has been undertaken Historic England are now able to remove these from the HAR which is a real achievement. These will be reflected in the next monitoring period.

## 4.15 Household Design

### Context

4.15.1 Redbridge is a largely residential suburban borough, with the second largest household size in the country. As a result of this, there are a high number of

residential extensions. The Council's planning policies seek to balance the benefits of increased private space for householders against visual and amenity impacts for neighbours and the wider community.

- 4.15.2 To ensure that extensions and alterations to houses are appropriate the Council prepared the Householder Design Guide Supplementary Planning Document in 2012. This guidance is a material consideration when assessing a planning application for alterations and extensions. Alterations and extensions therefore need to be generally in accordance with this guidance. Where such development does not accord with the guidance they will generally be refused planning permission.

## Performance

### Indicator 15: Use of Householder Design SPD

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO3</b> <b>Local Plan SO3</b>	Use of Householder Design Guide SPD	Number of applications refused using the principles set out in the SPD	Decreased from 97 applications per year to 16

**Table 18: Number of Applications refused under the superseded Householder Design Guide SPD from 2012**

Year	Number of Applications refused
<b>2014/15</b>	75 applications were refused using the SPD
<b>2015/16</b>	55 applications were refused using the SPD
<b>2016/17</b>	94 applications were refused using the SPD
<b>2017/18</b>	97 applications were refused using the SPD
<b>2018/19</b>	16 applications were refused using the SPD

- 4.15.3 The number of applications where the Householder Design Guide SPD was applied decreased significantly to 16 in 2018/2019.

## Conclusion

- 4.15.4 The number of applications where the Householder Design Guide SPD was applied decreased significantly to 16 in 2018/2019 implying that the Council was approving more applications as the quality of applications had improved, and more applications fell under permitted development. A further reason why the Householder Design Guide was applied/ referenced less in 2018/2019 is due to the

draft Housing Design Guide at the time which meant that the SPD had less weight, and so was referenced less.

- 4.15.5 The Council has published a new Housing Design Guide SPD in 2019 to support the Local Plan. The application of this new SPD will be reported on in the next AMR for 2019/2020.

## 4.16 Tall Buildings

### Context

- 4.16.1 The Redbridge Local Plan has introduced a new indicator monitoring the new tall buildings in the borough. This can be monitored through the application of Local Plan Policy LP27: Tall Buildings.

### Performance

- 4.16.2 In the 2018/19 monitoring period, Redbridge Local Plan Policy LP27: Tall Buildings was considered and applied to 6 planning applications and 1 listed building consent application. Table 19 provides a summary of the applications.
- 4.16.3 Application 0659/18 at Development Site At 556 To 558, High Road, Seven Kings, Ilford was for the “erection of a five storey building plus basement to create 9 residential units (1x3-bed, 4x2-bed, 4x1-bed), 306sqm of retail space (Use Class A1) and 127sqm of flexible space (Use Class D1/B1) with associated refuse storage, cycle storage and amenity space following demolition of the existing building.” This application was refused by the Council then appealed by the developer but subsequently dismissed by the Planning Inspectorate in April 2019. The Inspector agreed that the proposed development would result in an adverse impact on the visual amenity and character and appearance of the area.

**Table 19: Applications with LP27: Tall Buildings considered in application**

<b>Application reference</b>	<b>Site Address</b>	<b>Application Type</b>	<b>Decision</b>
<b>0355/18</b>	Redbridge Town Hall, 128-142, High Road, Ilford, IG1 1DD	Listed Building Consent	Granted/Approved - with conditions
<b>0659/18</b>	Development Site At 556 To 558, High Road, Seven Kings, Ilford	Full Planning Permission	Refuse Permission/Consent
<b>3625/18</b>	Development Site At 556 To 558, High Road, Seven Kings, Ilford	Full Planning Permission	Granted/Approved - with conditions
<b>4326/16</b>	193-207, High Road, Ilford	Major Application	Granted/Approved - with conditions
<b>4426/17</b>	792-808, High Road, and 2-10, Goodmayes Road, Goodmayes, Ilford, IG3 8TH	Full Planning Permission	Granted/Approved - with conditions
<b>4734/18</b>	Ilford Railway Station, Cranbrook Road, Ilford, IG1 4DU	Full Planning Permission	Granted/Approved - with conditions
<b>4832/17</b>	902-910, Eastern Avenue, Ilford, IG2 7HZ	Major Application	Granted/Approved - with conditions

## Conclusion

4.16.4 It is difficult to draw any conclusions on tall buildings at this stage. However, the Council anticipates that due to the need for more housing and the attraction of the Crossrail Corridor there may be more proposals for tall buildings in the future.

## 4.17 Basement Developments

### Context

4.17.1 The Redbridge Local Plan has introduced a new indicator monitoring the number of new basement developments in the borough. This can be monitored through the application of Local Plan Policy LP31: Basement Developments.

4.17.2 Redbridge Local Plan Policy LP31 applies to extensions to existing basement or other underground development that requires the further excavation of land. Where planning permission is required for basement development, the aim of the policy is to avoid harm to the built and natural environment, flooding, ground instability and threats to local amenity.

## Performance

4.17.3 In the 2018/19 monitoring period, there was a total of 32 basement applications. Of these applications, a total of 24 had Redbridge Local Plan Policy LP31: Basement Development used in the consideration of the application.

## Conclusion

4.17.4 It is difficult to draw any conclusions on basement developments at this stage. However, the Council anticipates that there will be an increasing number of basement related planning applications in the future following the general London trends. Permitted development rights allow for some work to basements that do not require planning permission.

## 4.18 Sustainability – Air Quality

### Context

- 4.18.1 Air Quality is a significant issue at the London wide and national levels. Air pollution has a significant impact on public health, accounting for around 9,400 premature deaths in London each year and affecting the health of many more with asthma, hay fever and other conditions. Vehicles are the biggest cause of air pollution in Redbridge.
- 4.18.2 The whole of Redbridge has been declared as an Air Quality Management Area and the Council has recently updated its Air Quality Action Plan to address air quality issues. Air quality monitoring is reported on annually by the Council's Environmental Health team and the report is published online on the Redbridge website.
- 4.18.3 With regards to the monitoring of air quality indicators, the 2018/19 AMR report captures data from both the superseded planning policies and currently adopted policies from the Redbridge Local Plan 2015-2030. The indicator on air quality monitors the applications that comply with Policy E8 (Air Quality) of the Borough Wide Primary Policies DPD and Redbridge Local Plan Policy LP24: Pollution. It is important to note that Local Plan Policy LP24: Pollution additionally covers air, water, noise, light, waste and land contamination pollution.
- 4.18.4 Regarding planning applications, under Local Plan Policy LP24: Pollution, the Council requires major new developments to be at least "air quality neutral" and are required to provide an Air Quality Assessment for developments with 10 or more new homes. These Air Quality Assessments should take into account the Council's Air Quality Action Plan objectives and emissions targets. A mitigation plan is required where developments will have a negative impact on air quality. Planning permission will be refused where air quality exposure is not reduced to acceptable levels.



## Performance

### Indicator 16: Application of Air Quality Policy (E8) to planning applications

LDF Objective & Indicator		Target	Performance
Local Plan Strategic Objective			
LDF SO2 Local Plan SO2	Air Quality	Increase number of applications to comply with policy E8	Policy E8 applied specifically to increasing number of applications

**Table 20: Planning Applications where Policy E8 (Air Quality) and Local Plan Policy LP24 were applied**

Year	Application of Policy E8
<b>2015/16</b>	<p>Policy E8 applied to seven approvals. Two related to major applications, one related to a variation of conditions, and four related to full planning applications.</p> <p>Policy E8 also applied to six refusals. One was a prior approval to demolish, two were householder applications, and three were full planning applications.</p>
<b>2016/17</b>	<p>Policy E8 applied to nine approvals. Two related to major applications, two related to Section 73 material amendments, one to a discharge of conditions, one to a Section 106 variation, and three related to full planning applications.</p> <p>Policy E8 also applied to ten refusals. Four related to major applications, five related to full planning applications, and one related to a discharge of conditions.</p>
<b>2017/18</b>	<p>Policy E8 applied to eight approvals. One related to a Section 73 material amendment, two related to major applications, and five related to full planning applications.</p> <p>Policy E8 also applied to ten refusals. Three related to major applications, six related to full planning applications, and one related to a discharge of conditions.</p>
<b>2018/19</b>	<p>Policy E8 was applied to four major applications where permissions were granted with conditions attached. Post-adoption of the Local Plan in March 2018, Policy LP24: Pollution was used in the consideration of 72 granted applications with conditions attached: 10 were major applications, 46 were full planning applications, 1 was a householder application, 5 were advertisement consents, 1 was an outline permission (minor) application, 3 were Section 73 major applications, 4 were Section 73 minor applications and 1 was a discharge of conditions application. A total of 47 planning applications were refused with LP24: Pollution being used in the consideration of the application.</p>

- 4.18.5 In 2018/2019, Policy E8 was applied to four major applications where permissions were granted with conditions attached. Post-adoption of the Local Plan in March 2018, Policy LP24: Pollution was used in the consideration of 72 granted applications with conditions attached. A total of 47 planning applications were refused with LP24: Pollution being used in the consideration of the application.
- 4.18.6 Full information on the levels of pollutants can be found in the Council's Air Quality Annual Status Report for 2018. The key findings from the report is there is a downwards trend in certain pollutants including NO<sub>2</sub>, however, they are still above the target levels.

## Conclusion

- 4.18.7 The application of Policy E8 (Air Quality) was expected to be a low number (4) in the monitoring period due to the adoption of the Local Plan in March 2018 and Policy LP24: Pollution superseding air quality policies applying to planning policies. The high application of LP24: Pollution in the consideration of planning applications implies that this policy is being well-used by planners and covers a broad spectrum of pollution matters. A degree of caution should be applied to the statistics as no planning applications were refused solely on the basis of the developments inadequately meeting the requirements of LP24.
- 4.18.8 The trends for the application of Local Plan Policy LP24 cannot yet be fully determined as it was only introduced as a consideration during the monitoring period. However, the high application of LP24: Pollution in the consideration of planning applications implies that this policy is being well-used by planners and covers a broad spectrum of pollution matters. A degree of caution should be applied to the statistics as no planning applications were refused solely on the basis of the developments inadequately meeting the requirements of LP24.
- 4.18.9 An updated Air Quality Action Plan (AQAP) for 2020-2025 has been published which replaces the previous action plan, which ran from 2006. The AQAP includes a variety of focussed measures to ensure air quality including encouraging TfL accredited travel planning for schools, targeted intervention in the areas with the worst air quality, and measures to reduce emissions from buildings and developments.
- 4.18.10 To help improve air quality an Ultra Low Emission Zone (ULEZ) is in place in central London which started from 8 April 2019. Most vehicles including cars and vans will need to meet new, tighter exhaust emission standards (ULEZ standards) or pay a daily charge to travel within the area of the ULEZ. From 25 October 2021, the ULEZ area will be expanded to include the inner London area bounded by the North and South Circular Roads. This will include western areas of the London Borough of Redbridge such as South Woodford, Snaresbrook, Wanstead, and Aldersbrook.
- 4.18.11 Work the Council is undertaking to improve air quality includes the Ilford Garden Junction, a joint project with the London Borough of Newham, partly funded through the Low Emission Neighbourhood programme, which is part of the Mayor's Air Quality Fund and partly funded through the TfL Liveable Neighbourhood Fund. This will provide for planting to mitigate poor air quality (NO<sub>x</sub> and PM), a two-way

segregated cycle track, improved pedestrian facilities, structural lighting and other pollution mitigation at the A406 / A118 junction (North Circular Road /Ilford Hill) at the western end of Ilford town centre. Consultation on this scheme took place in early 2018 and construction commenced in June 2019. The Liveable Neighbourhoods funding is available until 31 March 2022.

- 4.18.12 The Council is addressing air pollution through a variety of measures outside the statutory framework, including partnering with Trees for Cities for an extensive tree planting programme across schools and parks. To further address broader air quality issues, the Council has declared a climate emergency and has developed an action plan. The Council will also be implementing the new London Plan policies this year and the requirements of this will feed into the Local Plan review, as will revised policies in the new London Plan covering topics including on car free developments, urban greening and the “urban greening factor”, and emissions from buildings.

## 4.19 Nature Conservation and Biodiversity

### Context

- 4.19.1 With regards to nature conservation and biodiversity, the key performance indicator targets are to maintain or improve performance and to protect from the loss of international, national or local sites of nature conservation importance.
- 4.19.2 The borough contains a series of designated assets of biodiversity and nature conservation value. For example, Epping Forest is designated as a Special Area of Conservation (SAC), Epping Forest, Wanstead Flats and Hainault Forest are all designated as Sites of Scientific Special Interest (SSSI) and the River Roding and Seven Kings Water are designated as Sites of Importance for Nature Conservation (SINC). The Council is proposing a SINC review and an updated nature and conservation strategy in the near future.
- 4.19.3 With regards to the Epping Forest SAC, the Council received a letter from Natural England regarding interim advice to ensure that recreational impacts on Epping Forest SAC arising from new development are compliant with Habitats Regulations; this requires residential development within a 6.2 km radius of the Epping Forest SAC to be assessed as to whether they will have an individual and/or cumulative impact on the SAC; and mitigation measures to be secured if necessary.
- 4.19.4 The Council is considering this advice in the assessment of applications and is undertaking its duty to cooperate with other Local Authorities within this area.
- 4.19.5 Any new residential development within the zones of influence of the Epping Forest SAC will need to secure avoidance and mitigation measures in relation to recreational impact upon the SAC. The measures would provide and/or contribute towards a Suitable Alternative Natural Greenspace (SANG) for developments over 100 units within 0 – 6.2km of the zone and/or Strategic Management and Monitoring (SMM) measures for developments within 0-3km of the zone. Developments less than 99 units within 0-3km of the zone are obliged to pay £30 per dwelling +£90 monitoring admin fee. The money goes to the Conservators of Epping Forest to

offset the use and mitigate the impact of the forest from additional visitors. A higher monitoring fee may be applicable to Major schemes, typically £500 or 5% of the fee, whichever is higher. This caps at £50,000.

## Performance

### Indicator 17: Number of Species recorded in borough

<b>LDF Objective &amp; Indicator Local Plan Strategic Objective</b>	<b>Target</b>	<b>Performance</b>
<b>LDF SO2 Local Plan SO2 &amp; SO4</b>	All species recorded in the borough Designated Species London Invasive Species Absent species record	Maintain or improve performance Maintained

**Table 21: Biodiversity in Redbridge (Data obtained from GiGL)**

<b>Year</b>	<b>2012/13</b>	<b>2016/17</b>	<b>2018/19</b>
<b>All species recorded in the borough</b>	3,376	3,376	1,395
<b>Designated species</b>	379	367	899
<b>London Invasive species</b>	27	30	21
<b>Absent species record</b>	704	-	-

4.19.6 The 2018/19 data in Table 21 has been obtained from the GiGL (Greenspace in Greater London) Partnership. GiGL provides detailed monitoring of biodiversity and green space in London.

4.19.7 According to the 2018/19 data, it appears that the number of species recorded in the borough has declined significantly to 1,395 from 3,376 in 2016/17, however the number of designated species has increased significantly since 2016/17. It also appears that the number of London invasive species has declined to 21 from 30 since 2016/17.

4.19.8 The Council has maintained its international, national or local sites of nature conservation importance.

4.19.9 The number of decided planning applications located in sites of nature conservation (SINCs) and biodiversity importance in the 2018/19 monitoring period were 11. Of those, 2 were refused and 9 were granted or granted with conditions attached.

4.19.10 In relation to increasing tree coverage across the Borough, the Council is working in a strategic partnership with the charity Trees for Cities to plant trees in schools and parks. The Council's Highways Trees Team also has an extensive tree planting and

maintenance programme. With regards to new developments, the Council's Local Plan Policy LP38: Protecting Trees and enhancing the Landscape seeks to maintain coverage and increase provision in areas of deficiency by supporting developments integrating trees, retaining trees, providing new trees and vegetation. Developments involving protected trees or trees in conservation areas or those that are major developments, are required to submit a arboricultural report/ tree survey/report with their planning application.

## Conclusion

- 4.19.11 There has been a significant decline in the number of species recorded in the reporting period. This may be because the data is not as robust and cannot be strongly relied upon or comparable as the surveys conducted are random with inconsistent methodologies, and may be influenced by one-off campaigns or individual effort. This means it is difficult to comment on the overall performance or trend in biodiversity over the plan period. The monitoring indicators for biodiversity may require reviewing for future AMRs.
- 4.19.12 However, the Council is currently seeking to conduct a review of its Sites of Nature Conservation (SINCs). This may alter the number of SINCs in the borough. Nonetheless for this to have planning status this piece of work would need to be part of a future Local Plan Update otherwise it will have no planning weight.

## 4.20 Green Belt, Metropolitan Open Land (MOL) and Open Space

### Context

- 4.20.1 Redbridge has a good amount of open space compared to other London boroughs. Currently, 1919.8 ha in the borough is designated Green Belt; 325.3 ha is Open Space; 8.8 ha is Metropolitan Open Land (MOL). Therefore, the total combined area of Green Belt, Open Space and Metropolitan Open Land is 2253.9 ha which is approximately 40% of the total area of the borough (which is approximately 5,626ha). 34% of the borough is Green Belt and MOL.
- 4.20.2 The borough has over 50 parks and open spaces. Hainault Forest and Roding Valley Park are two regionally significant open spaces. Much of the public open space in the borough is owned by the Council, however in the west of the borough a significant area of open land is owned and managed by the City of London Corporation, whilst still being open and accessible to residents.
- 4.20.3 Green Belt and Open Space are important for nature, recreation, and overall quality of life. The Council seeks to protect, improve accessibility to these spaces and improve their quality.
- 4.20.4 The Redbridge Open Space Assessment (2017) was prepared to support the development of the Local Plan. It provides information on areas of public open space deficiency in the borough, taking account of new population growth figures. Access to open spaces by ward is set out in Table 22.

**Table 22: Access to Green Space by Ward**

Ward	Proportion of Residential addresses in Area of Deficiency			
	Local, Small and Pocket Parks	District Parks	Metropolitan Parks	Regional Parks
	%	%	%	%
Aldborough	64.92	62.55	29.26	0.30
Barkingside	58.38	45.37	0.00	0.00
Bridge	33.09	0.00	0.00	0.00
Chadwell	39.65	98.66	80.55	98.50
Church End	28.16	0.75	0.00	0.00
Clayhall	56.36	26.47	0.00	0.00
Clementswood	31.98	63.18	26.45	0.00
Cranbrook	35.55	0.00	0.00	0.00
Fairlop	52.41	27.36	0.00	0.00
Fullwell	48.72	5.34	0.00	0.00
Goodmayes	66.95	91.46	16.97	34.76
Hainault	57.46	10.43	0.00	12.51
Loxford	57.24	9.07	38.21	0.00
Mayfield	46.36	21.59	36.10	26.71
Monkhams	18.42	0.00	0.00	0.00
Newbury	77.90	14.30	37.78	0.00
Roding	40.64	0.00	0.00	0.00
Seven Kings	36.74	15.81	96.67	10.68
Snaresbrook	23.94	1.54	0.00	0.00
Valentines	61.67	0.00	0.00	0.00
Wanstead	27.83	0.08	0.00	0.00
<b>Total</b>	<b>46.41</b>	<b>23.57</b>	<b>17.97</b>	<b>8.89</b>

4.20.5 Whilst access to open space varies across the borough, generally areas in the south are more deficient in open space compared with areas to the north. This data forms the baseline for monitoring.

4.20.6 The Local Plan both place strong protection on Green Belt, MOL and open spaces. There is a general presumption against the loss of such areas and protection from inappropriate development within them.

## Performance

### Indicator 18: Change in Green Belt and Open Space

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF CR1 and SP2</b> <b>Local Plan SO2</b>	Change in Green Belt, MOL and Open Space area	No net loss	0.11 hectares of open space was lost in 2018/19

4.20.7 A total of 0.11 hectares of open space was lost in a single planning permission granted in 2018/19. This was due to planning application with reference 3768/17 at the former Newbury Park District Synagogue, 23 Wessex Close, Newbury Park.

## Conclusion

4.20.8 The loss of open space is attributable partly due to the synagogue and partly due to the tennis courts which constitutes loss of outdoor sports facilities in application 3768/17. Local Plan Policy LP35: Protecting and Enhancing Open Spaces seeks to protect and enhance the quality and improve the access to existing green spaces.

4.20.9 There has been no change in green belt, green space or MOL during the reporting period.

## 4.21 Green Flag Award Scheme

### Context

4.21.1 The Green Flag Award scheme recognises and rewards well managed parks and green spaces, setting the benchmark standard for the management of recreational outdoor spaces across the country.

4.21.2 In 2013, the Council had six parks which achieved this standard. In the 2017/18 monitoring period, the figure had increased to nine parks.

## Performance

### Indicator 19: Green Flag Parks in the Borough

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO8</b> <b>Local Plan SO2</b>	Number of Parks maintained to Green Flag Standard	Maintain the 6 Parks at Green Flag standard	Maintained – There are now 9 Green Flag standard parks.

4.21.3 The number of parks achieving Green Flag standard has been maintained in the 2018/19 monitoring period. Valentines Park was voted as one of the top ten parks in the country.

4.21.4 The parks which have achieved the award are Claybury Park, Clayhall Park, Elmhurst Gardens, Goodmayes Park, Hainault Forest Country Park, Ilford War Memorial, Seven Kings Park, South Park and Valentines Park.

## Conclusion

4.21.5 Vision Redbridge Culture & Leisure have successfully worked on maintaining the number of Green Flag standard parks in the borough during 2018/19.

## 4.22 Allotments

### Performance

4.22.1 The borough has a total of 24 allotment sites distributed across the borough. 14 are directly managed by Vision Redbridge, with 10 managed by societies or independent voluntary organisations. Waiting lists operate at almost all sites, varying from several months to up to 20 years.

4.22.2 To alleviate this, the Council is now reusing part of a site in Wanstead Park Road to increase allotments provision in the borough. This site will release an additional 60 plots.

## 4.23 Flood Risk

### Context

4.23.1 Redbridge Local Plan 2015-2030 Policy LP21: Water and Flooding seeks to ensure that development does not increase flood risk and implements opportunities to reduce the risk of flooding overall.

4.23.2 Proposals for developments where they increase flood risk or conflict with the sequential approach or fail the exceptions test to flood risk as identified in the Council's Strategic Flood Risk Assessment (SFRA) are resisted. Development



proposals in areas at risk of flooding must be accompanied by a site-specific Flood Risk Assessment. Flood resistant and flood resilient measures are to be incorporated into the design of new buildings in areas prone to flooding in accordance with the recommendations of the SFRA and Environment Agency.

- 4.23.3 The target monitoring indicator for flood risk management is that no planning permissions should be granted contrary to the advice of the Environment Agency.

## Performance

### Indicator 20: Planning Applications granted contrary to Environment Agency advice

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
LDF SO2 & Policy SP2 Local Plan SO2 & SO4	Number of planning permissions granted contrary to the advice of the Environment Agency.	No planning permissions granted contrary to the advice of the Environment Agency.	No applications granted contrary to advice. On target

- 4.23.4 In the 2018/19 monitoring period, there were no planning permissions granted contrary to the advice of the Environment Agency.

## Conclusion

- 4.23.5 The fact the no planning applications were granted contrary to the Environment Agency's advice is testament to the successful application of policy LP21: Water and Flooding by the Planning Team.
- 4.23.6 The Council is working with the Environment Agency to install flood alleviation strategies across areas in the borough which are most at risk from flooding. There are three current flood alleviation schemes: those being the River Roding Project, the Clayhall Flood Alleviation Scheme and the Seven Kings Flood Alleviation Scheme at Westwood Recreation Ground.
- 4.23.7 The River Roding Project is being led by the Environment Agency with Redbridge Council and works are due to start on this scheme in 2020 with the aim to finish in 2 years. The proposed works include a flood alleviation scheme in Epping Forest and downstream defence refurbishments in Woodford and Ilford.
- 4.23.8 The Clayhall Flood Alleviation Scheme involves a temporary flood storage area. Works are starting onsite in February 2020 with the aim of finishing in 2021.
- 4.23.9 The Seven Kings Flood Alleviation Scheme at Westwood Recreation Ground is being proposed in the near future. The proposals will most likely involve the creation of a flood storage area.

## 4.24 Renewable Energy

### Context

- 4.24.1 The Local Plan has introduced a new indicator on renewable energy capacity in the borough.
- 4.24.2 The Council monitors the renewable energy capacity installed in Council owned buildings across the borough. This information specifically relates to solar photovoltaic (PV) renewable energy.

### Performance

- 4.24.3 Across the 2018/19 monitoring period, there were a total of 33 sites with solar PV installed, with 20 of those at schools. There were 8 houses that have solar panels installed but their capacity is unknown.

### Conclusion

- 4.24.4 As this is a new performance indicator, the trends will be reported on this in the next AMR.

## 4.25 Waste and Recycling

### Context

- 4.25.1 Redbridge is committed to the sustainable management of waste, in line with national and regional policy, through prioritising waste reduction, re-use and recycling.
- 4.25.2 The responsible authority for the disposal and treatment of waste generated in Redbridge is the East London Waste Authority (ELWA). It receives and manages the disposal of waste from Barking & Dagenham, Havering, Newham and Redbridge (the east London waste boroughs). The Council has a Joint Waste Development Plan Document (DPD), prepared with the east London waste boroughs, which was adopted in February 2012. The Joint Waste DPD sets out a planning strategy for ongoing sustainable waste management and ensures the adequate provision for waste management facilities (including disposal) for municipal (i.e. household) waste, commercial and industrial waste, construction and demolition waste and hazardous waste.
- 4.25.3 Local authority collected waste (previously termed municipal waste) includes all waste collected for recycling, composting, recovery and disposal from households in the East London area by the boroughs in their capacity as waste collection authorities.
- 4.25.4 The Council monitors the throughput of identified Recycling Facilities in the borough at its recycling centres in Chigwell Road and Ilford.

## Performance

4.25.5 For the 2018/19 reportable period, the recycling rate was 27%. In 2015/16 the recycling rate was 28%; in 2014/15 it was 29% and in 2013/14 it was 30%. This clearly demonstrates that there is a slight year-on-year decline in recycling rates. The Council recognises the importance of improving its recycling levels and will work with the ELWA and partners to address this.

## Conclusion

4.25.6 Redbridge does need to improve its recycling levels but is constrained by the present waste disposal contract which offers no financial incentive to recycle more. Therefore, it is acknowledged that the future delivery of the waste and recycling services will require a different arrangement from what is run currently. In order to increase recycling levels in Redbridge and meet other challenging external targets set by the Mayor of London, the Council needs to be dealing directly with all the issues and ensuring that more effort is made to reduce waste and to reuse materials as much as possible.

4.25.7 In March 2019 Cabinet revised its January 2018 decision to bring the waste and recycling collection services inhouse and agreed that the better option for the Authority was to incorporate a wholly owned local authority company to perform these functions. This company would provide the Authority with more direct control over the design of collection regimes and enable service performance to be improved in the future. The local authority company - Redbridge Civic Services Ltd became operational in July 2019. Service improvement has already been seen around missed collections. Cabinet at the same time approved the 2019 Waste Reduction Strategy aimed at minimising waste and increasing recycling. One of the key elements of this Strategy was to consider containerisation using wheeled bins aimed at reducing waste, increasing recycling and keeping the streets cleaner. The Authority is piloting this scheme in 2020 and if the pilot is successful the new service will be roll out borough wide in 2021.

## 4.26 Minerals

### Context

4.26.1 The Redbridge Minerals Local Plan (2012) seeks to manage the resources and extraction of minerals within the borough, as well as associated issues such as site remediation, dust, transport, and recycling of aggregates.

4.26.2 In a planning sense, the term 'minerals' refers to aggregates, industrial minerals, hydrocarbons, and coal. These are necessary to support construction, road and rail infrastructure, energy production, and various industrial, agricultural and manufacturing processes.

4.26.3 In the local context minerals planning primarily concerns sand and gravel extraction from land at Fairlop Quarry in the north-east of the borough, within the Green Belt. Gravel has been extracted from this area since the mid-1950s.

- 4.26.4 London Plan Policy 5.20 sets a target across London for a minimum of 5million tonnes (i.e. a seven year supply) of land won (i.e. extracted / mined) aggregates to have planning consent and be available for extraction at any given time to 2031. The policy does however acknowledge that the majority of London's aggregate supply must come from imports.
- 4.26.5 Of this, a minimum of 0.7 million tonnes is apportioned to Redbridge (100,000 tonnes annually), and the borough is required to maintain a seven year land bank of readily extractable minerals.

## Performance

### Indicator 21: Sand and Gravel Extraction per annum

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO5</b> <b>Local Plan SO2 &amp; SO4</b>	Production of Primary Land Won Aggregates	London Plan target: sand and gravel extraction is 100,000 tonnes per annum, minimum.	No current extraction activity. Permission granted for extraction of 1,000,000 tonnes.

### Indicator 22: Total remaining minerals supply

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO5</b> <b>Local Plan SO2 &amp; SO4</b>	Total proven remaining Minerals supply	Sufficient to allow 100,000 tonnes annual extraction	c. 1,000,000 tonnes proven reserves

- 4.26.6 With regards to the seven year land bank of readily extractable minerals, this is an achievable target, as the proven reserve on phases E and F is 1 million tonnes of sand and gravel, meaning Redbridge can achieve its seven year land bank as Indicator 22: Total remaining minerals supply demonstrates.
- 4.26.7 Indicator 21: Sand and Gravel Extraction per annum shows, during the 2018-19 monitoring period, there was no ongoing extraction.

## Conclusion

- 4.26.8 However, an application to extract gravel from sites at Fairlop Quarry (application number 2089/16) was approved by the Council in July 2017, subject to completion of the Section 106 agreement; this agreement was then completed and the application was signed off in June 2018, meaning extraction can commence subject

to discharging pre-commencement planning conditions. This permission means the 7 year minerals land bank for Redbridge is achieved.

## 4.27 Infrastructure Funding and Delivery – Infrastructure Delivery Plan & Health

### Context

- 4.27.1 The delivery of infrastructure required to support the borough's needs and future growth is contained within the Infrastructure Delivery Plan (IDP).
- 4.27.2 The IDP covers the same period as the Local Plan (2015-2030) and details the capital projects necessary to support jobs and housing, as well as delivery partners and funding streams.
- 4.27.3 Increases in population mean that provision of new and expanded healthcare and medical facilities are important in meeting the healthcare needs of Redbridge.
- 4.27.4 The Council are not directly responsible for the provision of healthcare and medical facilities; however through the Local Plan, major housing sites have been allocated for the provision of new GP facilities, and the Council actively works with the Clinical Commissioning Group.

### Performance

- 4.27.5 No significant new floorspace for medical or healthcare facilities has been completed within the 2018/19 monitoring period.

## 4.28 Education and Community

### Context

- 4.28.1 The Local Plan includes ambitious targets for the delivery of new schools and community facilities.
- 4.28.2 To meet future service requirements in a cost effective manner, the Council is currently developing plans for new locality hubs as detailed in the November 2018 Cabinet Report, which will allow for the co-location of Council services, community spaces, and other public sector bodies; it is envisaged that these would be developed as part of Redbridge Living residential developments. This will provide new, accessible, community facilities, and will reduce overhead costs.

## Performance

### Indicator 23: Delivery of D1 floorspace in Redbridge

LDF Objective & Local Plan Objective	Indicator Strategic	Target	Performance
<b>Local Plan SO1</b>	Use Class D1 (Non Residential Institutions) Amount of approved floorspace completed.	Net increase	Net increase of 2331m <sup>2</sup> approved in 2018-19 period

4.28.3 There was a net increase in approved D1 use class floorspace during the 2018/19 monitoring period. The majority of this net increase in floorspace was due to two separate applications approved during this time: 3467/18 for the erection of a 3-storey block with part basement containing dining hall and kitchen space, classrooms and associated spaces, and swimming pool, with new accessible leisure centre entrance facility, administrations spaces, dance studio and associated facilities at Wanstead High School; 5434/17 for a new structure for sports, training, health and education facilities at Woodford Town Football Ground.

4.28.4 New schools, school expansions, and Further Education completions are shown in Table 23.

**Table 23: Developments with D1 floorspace completed during 2018/19**

Planning reference number	Name or Address	Type of institution	Description	Net Increase in Floor area in m <sup>2</sup>	Date Completed
<b>1445/16</b>	Al Noor Primary School 619-629, Green Lane, Seven Kings, Ilford, IG3 9RP	Primary School	Demolish existing buildings. Erection of 2 Form Entry Primary School with associated external playspace, service area and landscaping (summary).	1,407	20/06/2018
<b>2725/18</b>	Nannie Annies Day Nursery 508, High Road, Woodford Green, IG8 0PN	Nursery	Change of use of ground floor from retail (A1) and live/work unit to nursery (D1) (retrospective) (summary).	84	15/11/2018
<b>1902/15</b>	Parkhill Infant & Junior Schools	Primary Schools	Single storey extensions to Infants and Juniors classroom blocks, Dining Hall and Juniors Staff Room and associated works. (Summary)	934	16/05/2018

**Table 24: Capital school projects completed in 2018/2019**

Project Name	Project Proposals	Contract Sum
Gearies Primary School Expansion	To accommodate an additional form of entry (+1FE). To provide a new teaching block, which will provide additional teaching and ancillary support along with improvements to access and landscaping.	£4,103,306.94
South Park Primary School Sports Storage & Refurbishment of Medical & Reception Room	Conversion of an existing shelter to a play equipment storage area and a refurbishment of medical and reception room.	£639,000
Grove Primary School	Construction of a new hall.	£479,910.00
Parkhill Infant & Junior Schools	Expansion of existing school, including new classroom block, extensions, re-modelling works and external works	-

4.28.5 As outlined in Table 24, the Council completed four capital school projects in 2018/2019: those being Gearies Primary School Expansion, South Park Primary School Sports Storage & Refurbishment of Medical & Reception Room, Grove Primary School new hall, and Parkhill Infant & Junior Schools classroom extensions.

4.28.6 The Mayfield Swimming Pool development for a new community swimming pool with fitness suite was a further capital funded project completed in the 2018/19 monitoring period on 16th November 2018.

## 5 Regeneration Projects and Housing Schemes

### 5.1 Context

- 5.1.1 The Council's Regeneration Strategy (2017-2027) directly links to the spatial priorities set out in the Local Plan (2015 – 2030). The Ilford Manifesto was launched in early 2017, articulating a vision for Ilford that makes the most of its diversity, connectivity, and cultural offer, whilst seeking to improve its retail offer and evening economy. It was followed by the Ilford Prospectus which illustrated, through a series of 'placemaking' propositions, and portrayed how Ilford can be developed in accordance with the Local Plan (2015 – 2030).
- 5.1.2 Ilford was designated a Housing Zone by the Mayor of London. This status is enabling housing led regeneration of the Ilford Hill and High Road areas. It will provide additional funding to accelerate the delivery of at least 2,189 homes (including 553 affordable homes) in Ilford.
- 5.1.3 The Council has also developed a vision for Gants Hill with ambitions to develop a thriving district centre with 500 new homes, 8000m<sup>2</sup> new retail floorspace, 2600m<sup>2</sup> new employment floorspace and 600 new jobs.
- 5.1.4 There is a vision for maintaining South Woodford as a vibrant, diverse and busy centre with a strong daytime and evening economy. The Council is seeking to provide 430 new homes, 3500m<sup>2</sup> new retail floorspace, 6100 m<sup>2</sup> new employment floorspace and 600 new jobs.
- 5.1.5 The Council's ambition for Barkingside Town Centre is to secure it as a strong, attractive and prosperous centre, and widen the centre's appeal as a place to visit and enjoy by day and into the evening. The completion of the Barkingside Town Centre Improvement Plan, also known "Better Barkingside", now fully implemented, delivered overall public realm improvements across the town centre. There are also opportunities for 500 new homes, 2000m<sup>2</sup> new retail floorspace and 125 new jobs.

### 5.2 Housing Schemes

- 5.2.1 The Council is working with a number of private sector partners including Durkan Estates, Swan Nu Living, Development Securities and others to deliver new housing in the zone. The development could support up to 4,000 jobs and 150 apprenticeships in the construction supply chain, with potential for around 300 construction jobs and 20 apprenticeships to be created each year in Ilford for the next 5 years. The Planning Department works closely with Economic Developer and Work Redbridge to secure these positions.
- 5.2.2 Housing schemes which have utilised Housing Zone funding include Britannia Music Site by Durkan Developers (354 new homes of which 206 units for Market Rent to be completed by 2020 marketed by M&G, and 148 units for Shared Ownership and Affordable Rent to be completed September 2019 marketed by Southern Housing)



due for completion in 2020, Paragon Heights by Swan Nu Living (141 new homes) due for completion in December 2019 and Horizon by U & I developers (122 new homes), completed in August 2018.

- 5.2.3 Project Malachi is a temporary accommodation project at 1a Chadwick Road, Ilford by The Salvation Army. It is on a 5-year lease to use the space to create a 'pop up hostel and workshop' in Ilford town centre. Functioning as temporary accommodation units with an integrated bicycle refurbishment social enterprise, this project will count as 'meanwhile use' prior to the Ilford town centre regeneration. Converted shipping containers will be accommodating 42 people, including 15 people that have no recourse to public funds.

### 5.3 Cultural Quarter in Ilford

- 5.3.1 Phase 1 of the Ilford public realm improvements at the junction of the High Road and Chadwick Road has been completed.
- 5.3.2 The Council successfully applied for £2m under the GLA's Good Growth Fund to support the development of a creative and cultural hub as part of an interim use strategy for the Town Hall, Janice Mews and existing car park site. The Spark project seeks to use these uses to develop demand/interest within the sector whilst it works to develop longer term plans for the creation of a Cultural Quarter as promoted within the Ilford Prospectus.
- 5.3.3 The project has seen the Town Hall refurbished to provide a range of artists' studios for *SPACE Studios*. The public art gallery opened in December 2019.
- 5.3.4 The Town Hall Car Park is being transformed by *Mercato Metropolitano* to provide a covered food market promoting fresh food from local growers and encouraging social enterprise with start-up food and beverage businesses. This attraction is due to open in summer 2020.

### 5.4 Community Hubs

- 5.4.1 The Council is in the initial stages in developing the Seven Kings Community Hub as part of the Council's Community Hubs programme. The intention is to co-produce each community hub with residents, working together to shape, design and co-develop six state-of-the-art hubs, integrated facilities that enhance and improve the quality of services and life for local people. The community hubs programme is a chance to build stronger, more accessible Redbridge services in partnership with residents. The proposals are for a mixed-used scheme providing new homes (including affordable homes) combined with multi-functional community, health and business start-up facilities.

## 5.5 Transport

- 5.5.1 Redbridge will benefit hugely from Crossrail. Class, however the opening of the central tunnels from Paddington to Whitechapel has been delayed and is now not expected to open until autumn 2021, with further delays to the full service from Shenfield to Paddington, Heathrow, and Reading.
- 5.5.2 In addition to the significant transport investment of Crossrail, there are a variety of borough led interventions to improve the safety, capacity and sustainability of the borough's transport network.
- 5.5.3 This is funded through TfL, with the main mechanism being the Local Implementation Plans (LIPs), as well as the Council's own capital budget. Borough funding from TfL is expected to deliver key priorities within the Mayor's Transport Strategy.
- 5.5.4 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, a good public transport experience and new homes and jobs. d. The LIP strategy focusses on the creation of Redbridge Low Emission Neighbourhoods which seeks to make streets healthier, greener and more accessible. It seeks improvements such as reducing rat running, slowing road speeds to 20mph, creating school streets and supporting healthier modes of travel by installing cycle infrastructure and electric vehicle charging points.
- 5.5.5 The main projects include the Ilford Garden Junction project, low emission neighbourhoods, completion of the local cycle network, school clean air zones.
- 5.5.6 Together with TfL and Crossrail the Council is currently working to improve the area around Seven Kings, Goodmayes and Chadwell Heath stations. These include improvements at Ilford, Goodmayes and Seven Kings as part of Crossrail and Newbury Park (completed in 2018), South Woodford (due 2020) and Snaresbrook (due in 2022) on the Central Line.
- 5.5.7 The Council's overall approach to car parking is that new schemes parking maxima in highly accessible locations and encourages car free development.

### Conclusion

- 5.5.8 The Council is making good progress delivering regeneration schemes and the council owned housing programme. The Cultural Quarter is beginning to transform Ilford Town Centre. Unfortunately, the improvements to Crossrail and the Crossrail stations and entrance areas are taking longer than expected and may be impact on the timing of delivery of new homes along the Crossrail Corridor.

## 6 Community Infrastructure Levy (CIL), Section 106 (S106) and New Homes Bonus

### 6.1 Infrastructure and Delivery

#### Context

- 6.1.1 CIL, S106 and the New Homes Bonus are an important source of income for the Council to help fund much-needed infrastructure projects. The Local Plan monitoring targets are to maintain or increase contributions through S106 agreements. With regards to CIL, the targets are to maintain or increase contributions.
- 6.1.2 Planning obligations under Section 106 of the Town and Country Planning Act 1990, commonly known as S106 Agreements, impose planning obligations (which may include financial contributions) on persons with an interest in the land. Planning obligations are used as a mechanism to make a development proposal acceptable in planning terms and to mitigate the impact of a proposed new development on local infrastructure and services.
- 6.1.3 The Planning Service is recruiting a CIL/ S106 officer to monitor and collect CIL and 106.

### 6.2 Section 106

#### Performance

##### Indicator 24: Section 106 Agreements

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO9</b> <b>Local Plan LP41</b>	Section 106 (a) Number of S106 agreements signed for the reported year and by contribution type (b) Amount of S106 money triggered & received for the reported year and where it has been spent. (c) S106 receipts related to affordable housing commuted sums agreed.	Maintain and increase contributions made through the planning system	Total Volume of Section 106 contributions received and negotiated decreased from previous year

**Table 25: Section 106 Contributions**

<b>Financial year</b>	<b>Summary</b>
<b>2014/15</b>	<p>In the year 2014/15, the Council received a total of <b>£513,661</b> in S106 financial contributions.</p> <p>In the same period, the Council negotiated five S106 agreements with a total value of £595,575.</p> <p>In addition, 212 on/off site affordable housing units were also secured.</p> <p>The Council spent a total of <b>£2,912,658</b> in the same financial period.</p>
<b>2015/16</b>	<p>In the year 2015/6, the Council received a total of <b>£1,265,703</b> in S106 financial contributions.</p> <p>In the same period, the Council negotiated one S106 agreement with a total value of £650,000.</p> <p>The Council spent a total of <b>£4,359,926</b> in the same financial period.</p>
<b>2016/17</b>	<p>In the year 2016/17, the Council received a total of <b>£6,909,616</b> in S106 financial contributions.</p> <p>In the same period, the Council negotiated six S106 agreements with a total value of £901,172.</p> <p>In addition, 80 on/off site affordable housing units were also secured.</p> <p>The Council spent a total of <b>£35,405</b> in the same financial period.</p>
<b>2018/19</b>	<p>In the year 2018/19, the Council received a total of <b>£1,027,564.41</b> in S106 financial contributions.</p> <p>In the same period, the Council negotiated seven S106 agreements with a total value of £2,319,750 excluding monitoring fees and any additional sums arising from late stage viability reviews.</p> <p>In addition, 165 on site affordable housing units were secured.</p> <p>The Council spent a total of £0 in the same financial period.</p>

- 6.2.1 In the year 2018/19, the Council received a total of £1,027,564.41 in S106 financial contributions which was a significant reduction from the previous year where it received a total of £6,909,616.
- 6.2.2 It did not spend any Section 106 monies during the 2018/19 financial year. As at 31st March 2019, the closing balance for S106 was £9,900,540.24. The majority of these funds are, however, committed towards specific infrastructure projects within the borough.

- 6.2.3 In September/October 2018, a total of 7 apprenticeships were started having been agreed through S106 agreements with Durkan at the Britannia Music Development Site At 60 To 70, Roden Street, Ilford.

## 6.3 Community Infrastructure Levy (CIL)

### Context

- 6.3.1 On 1st January 2012 Redbridge was the first London Borough to begin operating a Community Infrastructure Levy (CIL). The levy applies to most new development which includes one or more new dwellings, or more than 100m<sup>2</sup> of additional floor space.
- 6.3.2 CIL rates are calculated on a per square metre basis, and the Redbridge CIL is a single flat rate charge of £70 / m<sup>2</sup> (plus indexation) applied uniformly across the whole borough, with the same rate applying to all new types of development.
- 6.3.3 In addition to the Redbridge CIL, developers must also pay a Mayoral CIL of £35 / m<sup>2</sup> (plus indexation) used to fund Crossrail.
- 6.3.4 The money generated through CIL is required to be spent on infrastructure to support development in the borough; including schools, transport improvements, health care facilities, libraries, leisure and community facilities and open space provision. The full list of eligible infrastructure is published on the Council's "Regulation 123 List".
- 6.3.5 Whilst the majority of CIL funding is spent on strategic infrastructure projects in line with capital spending priorities, the Council is required to allocate 15% of all CIL funds generated to spending at the neighbourhood level.

### Performance

#### Indicator 25: Borough CIL

LDF Objective & Local Plan Strategic Objective	Indicator	Target
<b>LDF SO9</b> <b>Local Plan LP41</b>	Borough CIL (a) The total Borough CIL receipts for the reported year; (b) The total Borough CIL expenditure for the reported year; (c) Summary details of Borough CIL expenditure	Maintain and increase contributions made through the planning system

**Table 26: CIL income and expenditure**

<b>Financial year</b>	<b>Summary</b>
<b>2014/15</b>	<p>In the year 2014/15, the Council issued 99 liability notices with a potential value of £3,585,497.</p> <p>In the same period, the Council received a total of <b>£1,398,282</b> in Redbridge CIL. £199,255 of this money was allocated towards the CIL Local Project fund.</p> <p>Total CIL expenditure for strategic infrastructure projects for the same year was <b>£1,580,615.</b></p>
<b>2015/16</b>	<p>In the year 2015/16, the Council issued 63 liability notices with a potential value of £1,273,757.</p> <p>In the same period, the Council received a total of <b>£1,564,295</b> in Redbridge CIL. £222,912 of this money was allocated towards the CIL Local Project fund.</p> <p>Total CIL expenditure for strategic infrastructure projects for the same year was <b>£1,564,295.</b></p> <p>In addition, £15,388 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in Table 27: Local CIL spend 2015/16.</p>
<b>2016/17</b>	<p>In the year 2016/17, the Council issued 106 CIL liability notices with a potential value of £6,393,617.</p> <p>In the same period, the Council received a total of <b>£1,629,961</b> in Redbridge CIL. £184,600 of this money was allocated towards the CIL Local Project Fund.</p> <p>Total CIL expenditure for strategic infrastructure projects for the same year was <b>£902,000.</b></p> <p>In addition, £67,170 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in</p> <p>Table 28: Local CIL spend 2016/17.</p>
<b>2018/19</b>	<p>In the year 2018/19, the Council issued 36 CIL liability notices with a potential value of £4,484,026.</p> <p>In the same period, the Council received a total of <b>£1,373,574</b> in Redbridge CIL. £195,734 of this money was allocated towards the CIL Local Project Fund.</p> <p>Total CIL expenditure for strategic infrastructure projects for the same year was <b>£0</b></p> <p>In addition, £176,190.17 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in</p> <p>Table 28: Local CIL spend 2016/17.</p>

- 6.3.6 Between the period 1st April 2018 and 31st March 2019, the Council raised a total of £1,373,574 in CIL receipts, and issued a further £4,484,026 in CIL liabilities, which will be due to be paid once those developments commence.
- 6.3.7 In Redbridge this neighbourhood CIL is distributed through CIL Local Project Fund, in which local communities can submit suggestions for projects and bid for funding through an annual consultation process. Tables 27 and 28 show how this money was spent in 2015/16 and 2016/17; however there was no Local CIL funding spent in 2014/15, and money raised was rolled forward. In 2018/19, a total of £176,190.17 was spent on neighbourhood CIL projects as listed in Table 30.

**Table 27: Local CIL spend 2015/16**

Infrastructure item	Amount
Christchurch Green Playground Repair (Snaresbrook ward)	£6,460
Facilities upgrade and expansion at Wanstead Park (Cranbrook ward)	£1,005
Onslow Gardens playground equipment upgrade (Roding ward)	£2,693
Top up contribution towards the facilities upgrade at Wanstead (Wanstead ward)	£5,230
<b>Total</b>	<b>£15,388</b>

**Table 28: Local CIL spend 2016/17**

Infrastructure item	Amount
Purchase of a small boat for South Park User Group to conserve the pond (Mayfield ward)	£800
Upgrade and replacement of scout toilet facilities with new plumbing and fittings for Seven Kings Scout Group (Seven Kings ward)	£1,170
New gateposts for the front of the garage at Elmhurst Gardens (Roding)	£600
Funding to support sector based employability project to address skills need in the borough (borough wide)	£12,000
Funding for Trading Post Project, which will provide the opportunity for new start-up businesses to test trade their products and services in the borough (borough wide)	£12,000
Funding to develop a strategic partnership between LBR and Trees for Cities. (borough wide)	£25,000
Funding towards a large scale bulb planting scheme across the borough (borough wide)	£15,000
Funding to plant four trees on Twyford Road (Loxford ward)	£600
<b>Total</b>	<b>£67,170</b>



**Table 29: Local CIL Spend 2017/18**

Infrastructure item	Amount
New fence in South Park (Mayfield ward)	£574
New bench in Goodmayes Park (Goodmayes ward)	£250
WW1 Commemorative plaque (Goodmayes ward)	£600
New signage to rename Goodmayes Park Extension as Orchard Playing Fields (Goodmayes ward)	£688
Renovation and refurbishment of Snaresbrook Garden of Remembrance (Snaresbrook ward)	£6,500
Dick Turpin renovation orchard project (Aldborough ward)	£397
Short courses in hospitality, health and social care, construction (Borough wide)	£20,000
Changing Places facility at Ilford Exchange (South region)	£60,000
Defibrillators (Borough wide)	£40,000
Tree planting (schools & open spaces) (Borough wide)	£1900
<b>Total</b>	<b>£130,909</b>

**Table 30: Local CIL Spend 2018/19**

Infrastructure item	Amount
Play improvements at Churchfields Recreation Ground	£16,724
Dick Turpin Orchard Project	£397
30 Defibrillators & cabinets	£43,500
Installation of power supply and mounting cabinets of defibrillators to 26 sites across London Borough of Redbridge	£468
3 Defibrillators at Hainault Business Park	£1,290
Defibrillator event	£5,069
Borough wide bulb planting scheme	£15,000
Fencing at South Park	£574
Changing Place facility at the Ilford Exchange	£60,315
New gateposts at Elmhurst Gardens	£600
Trees for Cities	£25,000
Miscellaneous costs	£6,829.17
<b>Total</b>	<b>176,190.17</b>

## 6.4 Mayoral CIL

### Context

- 6.4.1 Mayoral CIL (MCIL) is a levy to fund Transport for London strategic transport infrastructure (specifically Crossrail), charged at £35 per square metre (plus indexation) for all development within the borough (excluding health and education). Boroughs are located in one of three charging “bands” for the purposes of MCIL.
- 6.4.2 The previous MCIL mechanism expired for new planning approvals in 2019, having reached its London wide £600 million funding target a year early. The contribution to Crossrail from MCIL was originally capped at £600 million, however the overspend on Crossrail means further MCIL receipts will be used to repay part of a £1.3 billion loan to the Greater London Authority from the Department for Transport.
- 6.4.3 MCIL was replaced by Mayoral Community Infrastructure 2 (MCIL2) in 2019. This has a more ambitious funding target of £5.4 billion and is intended to pay for Crossrail 2. However as this does not yet have government approval, this is presently being used to pay for Crossrail and the Bakerloo Line Extension.

6.4.4 The Preliminary Draft Charging Schedule for MCIL2 was published for consultation in June 2017 and proposes an increased rate of £60 per square metre (plus indexation, although the index is “reset”) for Band 2 authorities, including Redbridge. The exemptions are the same as previously. The schedule was subject to Examination in Public in September 2018, and was introduced in April 2019 to replace MCIL.

## Performance

### Indicator 26: Mayoral CIL

LDF Objective & Local Plan Strategic Objective	Indicator	Target	Performance
<b>LDF SO9</b> <b>Local Plan LP41</b>	Mayoral CIL (a) The total Mayoral CIL receipts collected for the reported year; (b) The total amount of Mayoral CIL transferred to TfL for the reported year; (c) The total amount of Mayoral CIL applied to administrative expenses	Maintain and increase contributions made through the planning system	Level of contributions generally increasing

**Table 31: MCIL collected per financial year (£)**

MCIL	Payments
12/13	£29,370
13/14	£189,257
14/15	£300,904
15/16	£450,266
16/17	£377,134
17/18	£214,136
18/19	£585,056
<b>Total (£)</b>	<b>£2,146,123</b>

6.4.5 Over the past five years, the Council has collected a total of £2,146,123 in MCIL.

## 6.5 New Homes Bonus

### Context

- 6.5.1 The New Homes Bonus was introduced in 2011. This is a grant paid by the Government in order to promote housing growth and help fund the additional services required of new residents. For each new home constructed, the Government provides match funding for the Council tax liable (set as the national average council tax for the relevant band of property). This is adjusted for the increase or decrease in the number of empty homes, and an additional £350 per year premium for affordable homes is applied.
- 6.5.2 This bonus was originally granted annually for six years, however changes announced in 2016 as part of the provisional Local Government Finance Settlement mean that only additional housing above and beyond a national baseline of 0.4% of the existing stock would be rewarded; and that payments would be reduced to five years in 2017/18; and would be further reduced to four years in 2018/19.
- 6.5.3 This both reduces the amount of overall funding received per dwelling, and also means that the first c. 420 dwellings built per annum “don’t count” for funding purposes.
- 6.5.4 This funding can then be spent as a given local authority sees fit.

## Performance

**Table 32: Cumulative payments from the New Homes Bonus**

<b>Cumulative Payments in £</b>	<b>2011 / 12</b>	<b>2012 / 13</b>	<b>2013 / 14</b>	<b>2014 / 15</b>	<b>2015 / 16</b>	<b>2016 / 17</b>	<b>2017 / 18</b>	<b>2018 / 19</b>
<b>Payments for Year 1</b>	1,285,543	1,285,543	1,285,543	1,285,543	1,285,543	1,285,543		
<b>Payments for Year 2</b>		576,172	576,172	576,172	576,172	576,172		
<b>Payments for Year 3</b>			929,098	929,098	929,098	929,098	929,098	
<b>Payments for Year 4</b>				519,350	519,350	519,350	519,350	
<b>Payments for Year 5</b>					652,136	652,136	652,136	652,136
<b>Payments for Year 6</b>						459,905	459,905	459,905
<b>Payments for Year 7</b>							28,429	28,429
<b>Payments for Year 8</b>								22,050
<b>Total Payments in each year</b>	<b>1,285,543</b>	<b>1,861,715</b>	<b>2,790,814</b>	<b>3,310,163</b>	<b>3,962,300</b>	<b>4,422,204</b>	<b>2,588,918</b>	<b>1,162,520</b>

6.5.5 Since 2012 the Council has received a total of £20,221,657 in New Homes Bonus.

### Overall Conclusion

6.5.6 The Council is receiving a healthy amount of monies from S106, CIL and less so from the New Homes Bonus.

6.5.7 The reduction in the New Homes Bonus is expected as changes announced in 2016 as part of the provisional Local Government Finance Settlement mean that only additional housing above and beyond a national baseline of 0.4% of the existing stock would be rewarded; and that payments would be reduced to five years in 2017/18; and would be further reduced to four years in 2018/19.

6.5.8 The Council is reviewing its CIL charging schedule with a view to increasing overall income, whilst better reflecting the fact that different land uses attract different

values. The Council is in the process of reviewing its CIL charging schedule and consultation on the proposed changes closed in December 2019. It is expected that the revised CIL Charging Schedule will be submitted to the Secretary of State by April 2020, with the examination and adoption expected later in the year.

## 7 Planning Performance

### Context

7.1.1 Local planning authorities' performance in determining major and non-major planning applications is assessed against two measures:

- the speed with which applications are dealt with measured by the proportion of applications that are dealt with within the statutory time or an agreed extended period; and
- the quality of decisions made by local planning authorities measured by the proportion of decisions on applications that are subsequently overturned at appeal.

## 7.2 Planning Applications

### Context

7.2.1 The number and type of planning applications within a local authority can give a good indication of the overall level of development, notwithstanding that the applications themselves vary in size.

7.2.2 Fee income from planning applications is a significant source of income for Planning and Regeneration, and the Government has increased planning application fees by 20% across England from 17th January 2018, allowing for current service levels to be sustained as the number of applications increases.

### Performance

**Table 33: Applications received by Type (Summary) 2015-19**

Type of Application	2015/16	%	2016/17	%	2017/18	%	2018/19	%
<b>Major Applications</b>	20	0	47	1	39	1	43	1
<b>Minor Applications</b>	549	10	622	10	586	10	505	9
<b>Others</b>	2619	48	3050	51	2953	52	2649	48
<b>Not Required</b>	2282	42	2263	38	2110	37	2329	42
<b>Total</b>	<b>5470</b>	-	<b>5982</b>	-	<b>5688</b>	-	<b>5526</b>	-

7.2.3 A summary of applications is provided within Table 33 with percentage figures. This table shows an upward trend in the number of planning applications that the Council has received each year. Table 33 shows that in 2018/19 a total of 5526 planning applications were received, a slight reduction on the previous year.

## 7.3 Planning Determinations

### Context

- 7.3.1 There are national indicators for the determination of planning applications, which apply in the absence of a Planning Performance Agreement. 60% of major planning applications should be determined in 13 weeks and 70% of minor applications determined in 8 weeks. This is part of the Government's efforts to ensure the speedy delivery of housing.

### Performance

**Table 34: Determination of Applications within time**

Number and percentage of applications determined within target time												
Year	2015/16			2016/17			2017/18			2018/19		
Application Type	On Time	Total	%	On Time	Total	%	On Time	Total	%	On Time	Total	%
Major	9	20	45	29	41	71	23	26	89	28	29	97
Minor	263	456	58	273	459	59	463	511	91	379	425	89
Others	1673	2259	74	2149	2664	81	2751	2576	94	2086	2239	93
Not Required	2061	2195	94	1959	2115	93	1630	1876	87	1852	2242	83
<b>Total</b>	<b>4211</b>	<b>5234</b>	<b>80</b>	<b>4631</b>	<b>5590</b>	<b>83</b>	<b>4692</b>	<b>5164</b>	<b>91</b>	<b>4345</b>	<b>4935</b>	<b>91</b>

- 7.3.2 Despite this significant increase in caseload, as set out in Table 34, the Council's performance at determining applications within target timescales has improved over the monitoring period. Indeed, in the last financial year the Council met and exceeded its internal targets with 97% (target 82%) of major applications and 89% (target 75%) of minor applications, along with 93% (target 84%) of other applications. These targets in turn exceed national targets for determining applications.
- 7.3.3 The Council's target is for 85% of all applications to be approved. In the 2018/19 monitoring period, the Council met this target and achieved 85%. It is hoped that changes to the LPAR requirements will improve the quality of applications and increase this figure in future.



## 7.4 Appeals

### Context

- 7.4.1 The Council has a target that no more than 30% of appeals against the Council's decisions should be allowed.

### Performance

**Table 35: Appeals allowed in each year**

Year	2015/16	2016/17	2017/18	2018/19
<b>Percentage of Appeals Allowed</b>	34%	38%	41%	43%

**Table 36: Appeal performance by type**

Year 2018/19	Number Decided	Allowed / Notice Allowed or Varied	Split Decision	Allowed %
<b>Section 78 Appeal</b>	87	33	1	38%
<b>Householder Appeal</b>	57	27	0	47%
<b>Enforcement Appeal</b>	5	4	0	20%

**Table 37: Quality of planning decisions**

Decision Date	24 months to end of June 2017 (appeals to end of March 2018)		Target (maximum)
<b>Percentage of Decisions overturned at Appeal</b>	All	2.9	10.0
	Major	5.0	10.0

- 7.4.2 A total of 43% of planning appeals were allowed (in favour of the appellant) in 2018/19, which is an increase of 2% from 41% in the previous year
- 7.4.3 A total of 13.8% of all decisions of major applications were overturned at appeal. It is important to note that this statistic is provisional as it has not been confirmed by MHCLG.
- 7.4.4 The Government uses a slightly different measure for appeal performance, focussing on the "quality" of decisions, which looks at the percentage of all decisions (including approvals, and those refusals or non-determinations where no appeal takes place) which are overturned at appeal. However no updated statistics have been released for the 2018/19 monitoring year.
- 7.4.5 The percentage of appeals allowed in favour of the applicant each year. The Council was below target in 2018/19. However, only a small percentage of refused

applications are the subject of an appeal, suggesting that the decision by an applicant to make an appeal is taken tactically when there is a reasonable chance of success, and that other options (such as submission of a revised scheme) are often preferred.

## Conclusion

- 7.4.6 The percentage of appeals allowed in favour of the applicant each year. The Council was below target in 2018/19. However, only a small percentage of refused applications are the subject of an appeal, suggesting that the decision by an applicant to make an appeal is taken tactically when there is a reasonable chance of success, and that other options (such as submission of a revised scheme) are often preferred.

## 7.5 Pre-Application Advice

### Context

- 7.5.1 In common with most other local authorities, Redbridge offers a paid pre-application service, allowing prospective developers to receive comments on potential developments before they submit a full planning application. This is particularly important for larger proposals, or those of a complex or novel nature.
- 7.5.2 Pre-applications allow for draft layouts and designs to be submitted for comment from officers, prior to an application, allowing for potential issues to be identified earlier in the development process. This therefore means an application is both of a higher quality and is also more likely to be approved.

### Performance

**Table 38: Number of Pre-Application Enquiries per year**

	2015/16	2016/17	2017/18	2018/2019
Pre-App Enquiries	149	206	178	230

- 7.5.3 Table 38 shows there has been a significant increase in the number of pre-application enquiries in 2018/19 (230) compared with 2017/18 (178), which is the expected trend as developers view Redbridge and growth areas such as the Crossrail Corridor more favourably for potential new development.

### Conclusion

- 7.5.4 The Council now has an independent Design Review Panel, operated by Frame Projects; we will refer pre-application projects for major developments (10 units +) to the panel as well as certain smaller applications (such as those in Conservation Areas). The Redbridge Design Review Panel provides expert advice to applicants, council officers and the planning committee during the pre-application process, and by commenting on planning applications.

## 7.6 Strategic Applications

### Context

- 7.6.1 Planning applications of a strategic nature must be referred to the Mayor of London. These include (amongst other criteria) developments of 150 housing units or more, over 30 metres tall, or those on Green Belt or Metropolitan Open Land.
- 7.6.2 When an application is submitted to a local authority, they refer it to the Mayor, who provides an initial “stage one” consultation response. After the application is considered by planning officers or a planning committee, this is again referred to the Mayor as a “stage two” referral. The Mayor then decides whether to allow this decision to stand, to direct refusal, or to take over the application.

### Performance

- 7.6.3 A total of 2 Mayoral initial representations for the Bodgers Department Store and recorder House applications and 1 Mayor’s final decision for the Harrison Gibson building application were made in relation to Strategic Applications during 2018-19. In the Mayor’s final decision, he allowed the decision of Redbridge as the local authority to stand.

## 7.7 Enforcement

### Context

- 7.7.1 The NPPF states that effective planning enforcement is important in maintaining public confidence in the planning system, so that unauthorised structures and uses do not undermine the purpose of development management. Enforcement action is discretionary, and local authorities should act proportionately in responding to suspected breaches of planning control. Local authorities are encouraged to produce local enforcement plans.
- 7.7.2 A key achievement for in terms of Enforcement Planning was the adoption of the new Planning Enforcement and Direct Action Policy (2017). This document now sets out clearer guidance and consistency around the planning enforcement process.
- 7.7.3 The Council has a corporate target to close 60% of enforcement cases within 16 weeks of them being opened.

### Performance

- 7.7.4 The Council was below the target level in 2018/19 and closed 49.95% of its cases within the timeframe. Figure 2 displays the percentage of enforcement cases closed within 16 weeks from 2015-2019.
- 7.7.5 During the 2018/19 monitoring period, the Planning Enforcement Team issued 23 enforcement notices.

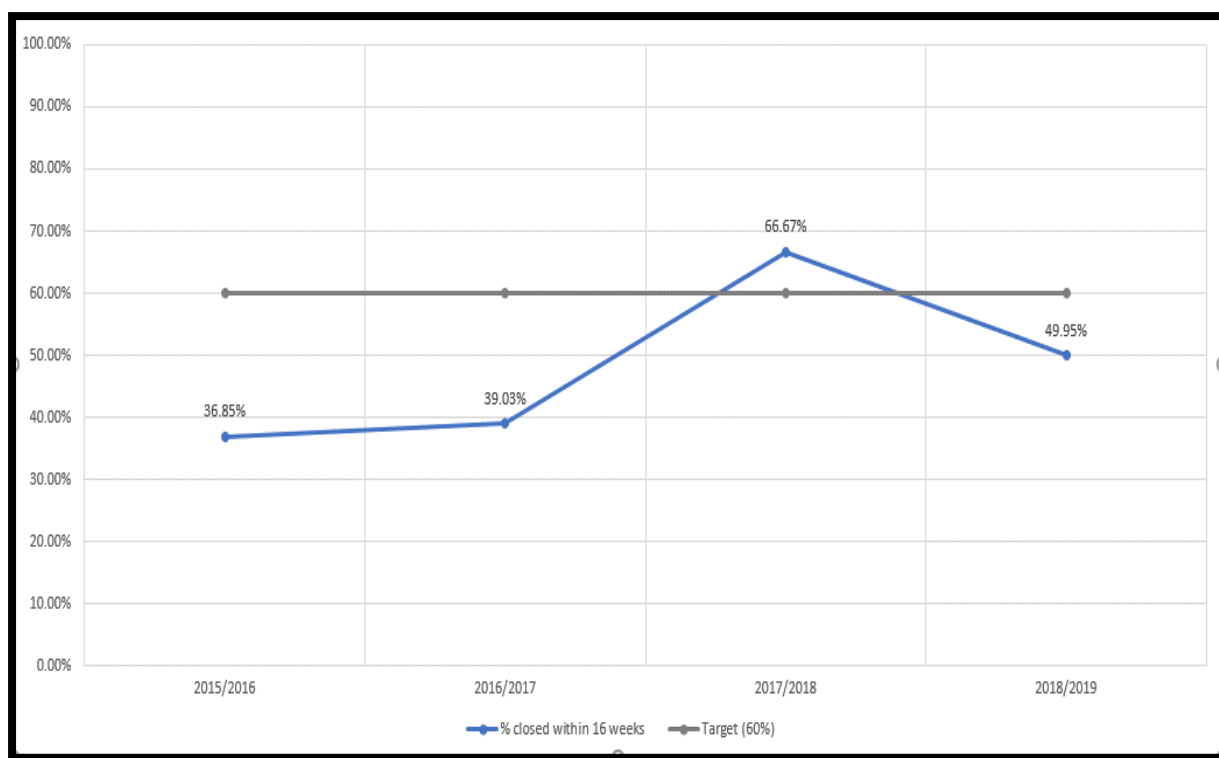


Figure 2: Percentage of Enforcement Cases Closed within 16 weeks from 2015-2019

## Conclusion

7.7.6 The Planning Enforcement target was not met due to budgetary pressures and limited resources mean that it only investigates the higher priority types of enforcement case. The Planning Enforcement and Direct Action Policy 2017 sets how cases are prioritised and the expectations from the service. The Council is seeking to increase the staffing levels in the Planning Enforcement Team to meet the shortfall in its performance targets.

## Overall Planning Performance Conclusion

7.7.7 The Development Management Team has exceeded its performance targets in the 2018/19 monitoring period with respect to the speed with which applications are dealt with measured by the proportion of applications that are dealt with within the statutory time or an agreed extended period.

7.7.8 However, the Council failed its target regarding appeals as 43% of planning applications were overturned at appeal. This is relatively high, although only 2.9% of all decisions are overturned at appeal. Trends in the types of application that are being appealed are being analysed to ensure the robustness of decision making.

7.7.9 The MHCLG use a slightly different measure, that focuses on the percentage of all planning decisions that are later overturned at appeal. 13.8% of all decisions on major applications were overturned; this did not meet the MHCLG benchmark of 10%. However, performance for non-major applications was significantly better at

2.9%. Failure to meet the benchmark places the authority at risk of designation and could fall under special measures.

- 7.7.10 The Planning Enforcement target was not met due to budgetary pressures and limited resources mean that it only investigates the higher priority types of enforcement case. The Planning Enforcement and Direct Action Policy 2017 sets how cases are prioritised and the expectations from the service. The Council is seeking to increase the staffing levels in the Planning Enforcement Team to meet the shortfall in its performance targets.

## 8 Unreported Indicators

8.1.1 The following new monitoring indicators aspects from the Redbridge Local Plan are not reported on in this AMR:

- The numbers of hot food takeaways, betting shops, shisha bars, and payday lenders within each local/town centre
- The 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)
- The amount of completed non-residential development within UCOs, A, B and D complying with car-parking standards set out in the Local Plan
- The annual average percentage in carbon dioxide emissions savings for strategic development proposals progressing towards zero carbon in residential developments by 2020 and in all developments by 2022
- Review of design quality through assessment of completed schemes, including Building for Life Assessments and monitoring of active ground floor uses within major developments over 50 units.
- Ensuring development makes a positive contribution to place making and local distinctiveness
- Shopfronts and signage respects the overall character and appearance of the building and street scene
- Sustainable design and construction techniques used in all developments.
- The quality of open spaces and public access to them is improved through new development opportunities and as part of the wider All London Green Grid network.
- The numbers of apprenticeships, job brokerage agreements, and contributions relating to skills and training through S106 agreements.

8.1.2 The Council is currently developing systems to monitor these indicators for the next AMR 2019/20.

## 9 Conclusions

- 9.1.1 The Council has made good progress in a number of areas throughout the 2018/19 AMR monitoring period.
- 9.1.2 The most significant for planning is the adoption in March 2018 of the Redbridge Local Plan. This is the culmination of a sustained period of developing and consulting upon the plan, and means that Redbridge now has an up to date plan compliant with the NPPF. However, the policies in the Local Plan will become out of date once the New London Plan is adopted in 2020.
- 9.1.3 The numbers of housing approvals and completions have both risen rapidly during the monitoring period, increasing overall housing supply in the borough. Unfortunately, the borough does not have a healthy housing pipeline and the Council cannot demonstrate a five year land supply. Significant steps are being taken including implementation of the Ilford Housing Zone, Ilford Prospectus and borough wide Housing Strategy to further increase supply and affordable housing delivery.
- 9.1.4 The general increase in the level of housing development in the borough has resulted in an increase in monies received via CIL, S106 and New Homes Bonus. These funds contribute to the delivery of key infrastructure projects in the borough which supports the borough's growing communities.
- 9.1.5 The Council aims to facilitate the regeneration of the borough and the recently approved Regeneration Strategy (2017 - 2027) sets out these ambitious plans. The Council has delivered and continues to undertake and seek funding for projects in the borough to facilitate regeneration. These projects include major investment in an improved public realm in Ilford, Barkingside and Gants Hill town centres as well development of the Ilford Manifesto and Prospectus.
- 9.1.6 Overall, Development Management, performance has improved, with an increase in the pace of determining planning applications such that all major targets are now being met or exceeded.
- 9.1.7 Planning Enforcement's performance has unfortunately fallen short of the target due to budgetary pressures and limited resources mean that it only investigates the higher priority types of enforcement case.
- 9.1.8 Future AMRs will continue to assess the performance and effectiveness of Redbridge's planning policies in delivering the key objectives of the Local Plan.

## 9.2 Appendix 1 - Abbreviations

<b>Abbreviation</b>	<b>Term</b>
<b>AMR</b>	Authority Monitoring Report
<b>AQAP</b>	Air Quality Action Plan
<b>CIL</b>	Community Infrastructure Levy
<b>DPD</b>	Development Plan Document
<b>GiGL</b>	Greenspace Information for Greater London
<b>GLA</b>	Greater London Authority
<b>GPDO</b>	General Permitted Development Order
<b>HMO</b>	House in Multiple Occupation
<b>IDP</b>	Infrastructure Delivery Plan
<b>LDD</b>	London Development Database
<b>LDF</b>	Local Development Framework
<b>LDS</b>	Local Development Scheme
<b>MCIL</b>	Mayoral Community Infrastructure Levy
<b>MHCLG</b>	Ministry of Housing, Communities and Local Government
<b>NPPF</b>	National Planning Policy Framework
<b>NPPG</b>	National Planning Practice Guidance
<b>PPG</b>	Planning Practice Guidance
<b>S106</b>	Section 106
<b>SHMA</b>	Strategic Housing Market Assessment
<b>SPD</b>	Supplementary Planning Document
<b>TfL</b>	Transport for London
<b>ULEZ</b>	Ultra Low Emission Zone