

**London Borough of Redbridge
Housing Delivery Test Action Plan
2022**

1.0 Introduction

1.1 This Housing Delivery Test (HDT) Action Plan has been produced to provide an overview of housing delivery in the Borough. This follows the publication of the latest housing delivery test results, by the Department for Levelling Up, Housing and Communities (DLUHC) in January 2022. The Action Plan also identifies measures and interventions that the Council will undertake to influence housing supply and delivery.

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

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

2.0 What this means for Redbridge

2.1 The National Planning Policy Framework (the Framework), which is a material consideration in planning decisions, requires that plans and decisions should apply a presumption in favour of sustainable development. The Framework states that the presumption in favour of sustainable development will be engaged where the HDT indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.

2.2 The published HDT figures show that the Council delivered 135% of its housing requirement and, therefore, there are no consequential actions arising. However, owing to an error made by the GLA when submitting the data, the published figures are incorrect, and the correct ones show that 67% of the housing requirement was achieved. As such, the corrected figures represent a significant material consideration that outweigh the published HDT results in determining applications. Consequently, as the delivery of housing was less than 75% of the housing requirement, the presumption in favour of sustainable development is engaged.

2.3 Over the three-year period of measurement (2018-2021) Redbridge only delivered 59% of its housing requirement. Redbridge is now the fifth worst authority for housing delivery in London having previously been the sixth worst authority for housing delivery.

Redbridge HDT results by year 2018-21

Year	2018-19	2019-20	2020-21	Cumulative 2018-21	HDT implication
Delivery	789	673	515	1977	Presumption in Favour
Target	1123	1028	748	2900	
% delivered	70%	65%	69%	68%	
Surplus / (shortfall)	(334)	(355)	(233)	(923)	
<i>NB – figures rounded to nearest whole dwelling</i>					

2.4 Rolling delivery is below 75% of the requirement. Consequently, the strategic housing policies in the Local Plan are now “out of date” and Redbridge is now subject to the Presumption in Favour of Sustainable Development in relation to the determination of applications for new housing. The “tilted balance” applies, which means new housing development should be allowed unless the adverse impacts of the development would significantly and demonstrably outweigh the benefits.

2.5 NPPF Paragraphs 11 to 14 cover the application of the Presumption. Because the HDT result is below 75%, the housing policies are “out of date” (and in effect superseded) and housing applications should be granted unless:

“the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”

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

3.0 Housing Delivery Analysis

3.1 Redbridge is a primarily residential borough in northeast London, of some 305,658 people (mid 2020 estimate) covering 65.41 km². Its main town is the metropolitan centre of Ilford, with smaller district centres at Barkingside, Gants Hill, South Woodford, and Wanstead. The borough benefits from good public transport links to central London via the Central line and TfL Rail, which will only improve with Crossrail, as well as road links to the national motorway network. The Local Plan Key Diagram (Figure 1) shows the key transport links and growth areas within the borough.

3.2 The existing housing stock is overwhelmingly privately owned, with 98,285 private sector dwellings, 4,537 Council dwellings, and 4,931 Registered Provider dwellings: out of

an overall stock of 107,753 dwellings¹. Owner occupation is high but there has been a significant shift to the private rented sector in recent years. Redbridge adopted a new Local Plan in March 2018. This plan provides an up-to-date planning framework and demonstrates a pro-active approach to growth, directing most of the new housing to the borough's five Investment and Growth Areas (Ilford, Crossrail Corridor, Gants Hill, Barkingside, and South Woodford).

3.3 Ilford and the Crossrail Corridor are by far the largest of the Investment and Growth Areas regarding the number of homes expected from allocated sites and are also expected to contribute a considerable proportion of windfall sites. Crossrail will provide a transformative effect to the actual and perceived connectivity of these sites to central London.

3.4 The need for effective delivery of housing and supporting infrastructure from within the Local Plan is urgent because Redbridge is undergoing rapid change demographically which includes growth in both population and average household size. Much of this is driven by welfare reform and increased property prices and rents in more central boroughs such as Tower Hamlets and Newham.

3.5 Redbridge has increasing housing demand as evidenced by the fact that it is the:

- London borough with the 13th fastest increasing property prices (year to February 2020).
- English local authority with the 4th largest projected percentage increase in population.
- English local authority with the 2nd largest average household size (2014).

¹ Figure as of 1 April 2021. Based on LT 100, accessed 27 May 2022
<https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

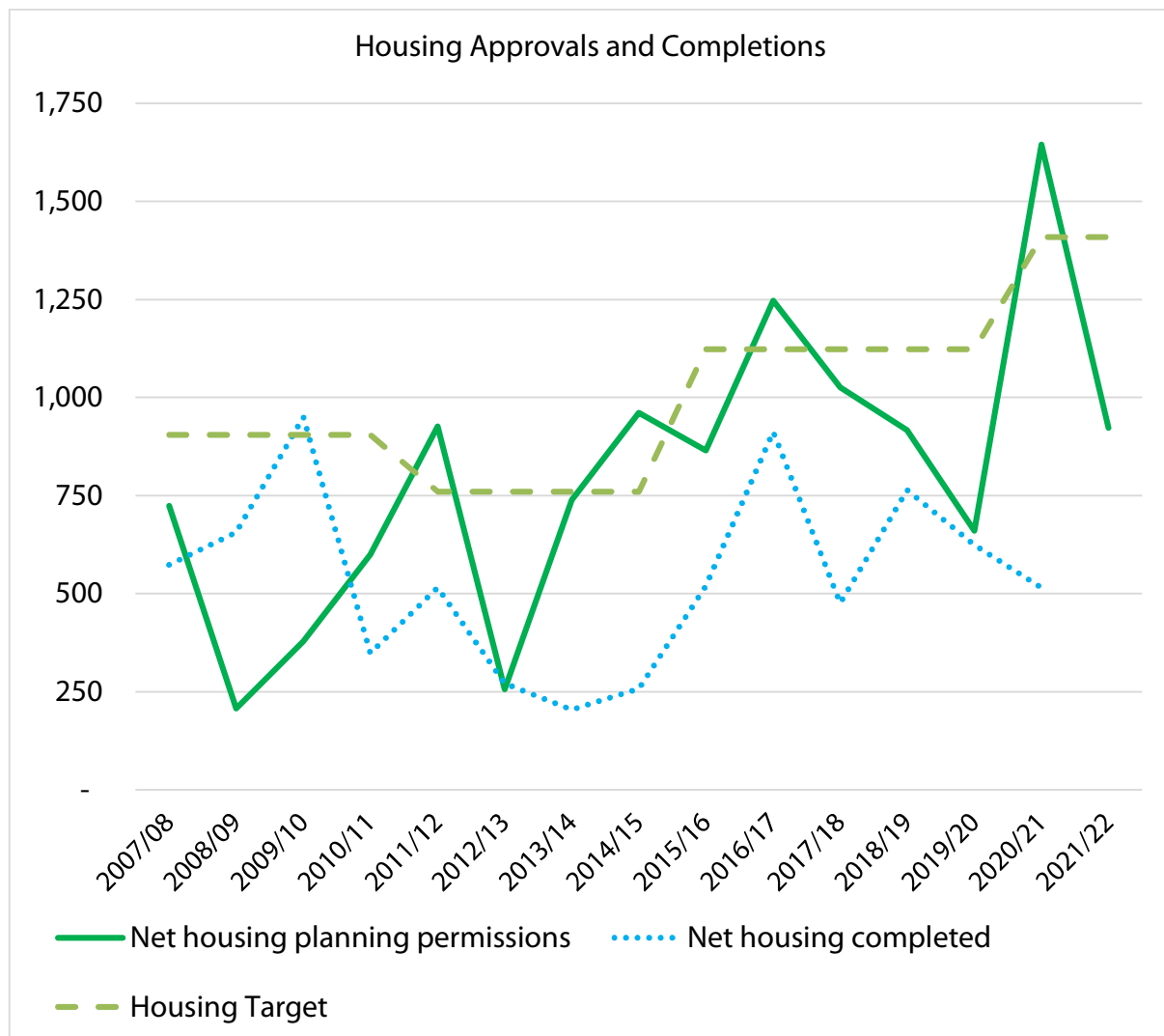
Figure 1: Local Plan Key Diagram



3.6 Redbridge’s housing target is imposed on the Council by the Greater London Authority via the London Plan. It follows the national position set out in the National Planning Policy Framework. Whilst various policy changes (regional and national) vary the targets, Redbridge’s housing target (for the 2018-2020 period) was to deliver 1,123 new homes per year. With the adoption of the new London Plan, the target is now 1,409 a year.

3.7 Like many authorities, especially in London and the Wider South-East where the targets are generally higher, Redbridge struggles to meet its housing delivery target. The chart below sets out Redbridge’s performance over the past decade and more. It shows that, even at times when the housing targets have been lower, Redbridge has only exceeded the target once in the past decade. Whilst the numbers of homes approved through planning and ultimately delivered on site have generally been increasing, the improvements have not kept pace with rising targets.

Figure 2: Housing approvals and completions v. target



3.8 Redbridge has not delivered its annual housing target since 2006/07, and its long-term performance at meeting both housing targets, and housing need (which is over double the housing target) is among the worst amongst local authorities in London. In common with other local authorities, Redbridge is largely dependent on the private sector for delivery, however delivery has been largely limited from large sites. Although house prices in Redbridge are around average for London (with average private sector rents amongst the lowest in London), the affordability ratio of house prices compared with local earnings is worse than for London as a whole.

3.9 Redbridge at present does not have a five-year land supply of developable sites. However, many sites included within this supply have been allocated for development for significant periods of time.

3.10 At the end of March 2022, there was a pipeline of approximately 3800 consented net conventional homes. This figure will be confirmed through the Council’s housing Starts and Completions exercise.

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

4.0 Key factors affecting housing delivery

4.1 There are several reasons for this; some of which are within the Council's gift and many which are not. At a macro-economic level, the chart above very effectively demonstrates the impact of wider economic cycles with recessions, Brexit and more recently Covid-19 all having a negative impact on development activity.

4.2 Nationally, 30% of planning permissions expire without ever having been delivered, larger consented schemes can take many years to deliver, and the last 7-8 years have been among the most housing market's most volatile in living memory. More locally, several factors impact on housing delivery rates including:

- The lack of historic support for development which has become an obstacle and whilst recent efforts have improved this, as demonstrated by increased planning activity, it is yet to translate into starts on site.
- Locally specific challenges around viability; build costs are approximately 90% of those in central London for any given building typology, and yet sales values - although rising rapidly - are much lower than compared to the rest of London. This makes Redbridge a relatively unattractive place for private sector led development and reduces the opportunity to cross-subsidise affordable housing.
- Sites allocated in the Local Plan are predominantly large urban sites, some with complex landownership which generally take more time to come forward as applications.
- Strategic sites are coming forward, but many are some distance away from being submitted as a planning application or achieving planning consent.
- Many of the Borough's larger sites are allocated in the Crossrail Corridor and the continued delay of Crossrail has therefore contributed to slow progress on major sites; and
- Many of the Borough's larger consented schemes, including, Bodgers, Metro Tower are yet to commence development. There are currently around 3,800 consented homes, of which around half are yet to commence.

5.0 Actions

5.1 Review of previous actions

5.1.1 In addition, in response to failing the HDT, Action Plans were produced in 2019, 2020, and 2021 which included a range of actions seeking to boost housing delivery rates.

5.1.2 This includes a range of both internal facing and external activities. Under these plans, the Council has:

- Actively engaged private sector developers, Registered Providers, and others to build relationships, facilitate investment and development, and ultimately encourage delivery of high-quality new housing.
- Established its own affordable and commercial development programme to directly deliver new homes on Council owned land including a commitment to commencing 600 new affordable homes by March 2022 and an initial 500 home programme through Redbridge Living.

- This has happened to some extent, however the HRA programme has been delayed, and Redbridge Living has been reabsorbed back into the Council.
- Established Redbridge Living as a wholly owned development company, in order to deliver a policy compliant mix of affordable and market housing. This was wound down in September 2021 and the development programme, consisting of three sites with live planning applications, was brought back in-house to be delivered directly by the Council. One of these is the Seven Kings Hub site.
- Proceeded with the Community Hubs programme (where community services will be co-located, with new housing delivered alongside the hubs as well as on sites from which services are relocated); with revised plans being prepared for the Seven Kings Hub site.
- Actively sought to work with developers and neighbouring landowners to bring forward larger, strategic sites where the Council is not the sole landowner. This has particularly focussed on Ilford Town Centre; and
- Undertaken a comprehensive review of the planning service to ensure that it was fit for purpose to facilitate the consideration, approval, and delivery of sustainable development proposals. This has included:
 - The introduction of a revised process for Pre-Application (Pre-App) and increased use of Planning Performance Agreements (PPA's) to ensure timely consideration of planning applications.
 - A root and branch review of planning processes to remove long standing backlogs and speed up decision timescales to be more responsive to developers.
 - Introduced a Design Review Panel to support developers to increase the quality of the design of their schemes.
 - Introduced an agent's forum to get consistent feedback into the planning process to ensure continued improvement in the service being provided.
 - Reviewed delegations, briefing and committee processes to ensure that Planning Committee was focussed on strategic schemes and could appropriately challenge developers to secure good growth; and
 - Reviewed the policy base to ensure it is fit for purpose including the adoption of two new SPDs in 2019 to provide additional guidance to developers, those being The Planning Obligations SPD and The Housing Design Guide SPD.

5.1.3 Whilst these initiatives have had a positive impact with planning activity rising, approvals rates improving and a growing pipeline of consented schemes, the Council continues to face major challenges in securing the physical delivery of new homes following many years of under delivery against regionally set housing targets.

A structured approach to working with the private developers on stalled sites.

5.1.4 The 2021 HDT Action Plan proposed a more focussed programme of targeted workshops and meetings with developers of sites with planning permission, as well as allocated sites that have not had any planning applications.

5.1.5 There has been progress with the sites where planning permission has been granted but the sites had stalled. On the Harrison Gibson development, where demolition of the existing structure began in January 2022 and there is ongoing dialogue with the owners of the programme of works. there is also an artist competition to design the new hoardings for the site. With the Bodgers, and Recorder House sites which are linked applications

several meetings have taken place with the agent for the site and the council is supporting them to overcome issues they are having with Network Rail. Enforcement action has been taken against the owners of the Metro Tower site in relation to the state of the hoardings on the site itself. The site has now been tidied and new hoardings erected.

5.1.6 On the sites where planning permission has not yet been granted there has also been some progress with several pre application meetings taking place on some of the sites.

Local Plan review

5.1.7 The proposed Local Plan review is now due to start in summer 2022, subject to Cabinet approval.

5.2 2022 Actions

Local Plan Review

5.2.1 The Council will need to undertake a Local Plan Review. This is due to commence in Summer 2022 (subject to cabinet approval) This will ensure that the challenges to housing delivery are tackled in a holistic manner and provide the Council with an opportunity to more positively integrate many of the new and emerging principles arising from recently completed programmes such as: The Growth Commission, The Member Task and Finish Groups on Climate Change and Biodiversity, The Council's response to COVID-19 and embed the Council's developing approach to providing community infrastructure to ensure that our growing communities are properly served and supported.

5.2.2 The revised Local Plan will take a more neighbourhood-based approach across the borough. To be included as an allocated site within the plan site owners will need to sign up to a Planning Performance Agreement.

5.2.3 There will be an in-depth programme of consultation with both local communities and landowners as part of the review process.

A continued structured approach to working with the private developers on stalled sites.

5.2.4 Following on from the success working with developers we will continue to work with landowners and developers we are already engaging with to discuss how we can remove the barriers to development and unlock stalled sites with the continuation of the systematic programme of engagement with developers and landowners of stalled sites with the focus on medium and small-scale sites.

5.2.5 Sites can be stalled at any stage in the planning and development process. Here, we have included several sites with planning permission, as well as allocated sites that have not had planning applications. We have included sites that we focused on last year where ongoing negotiations are in progress as well as new sites.

Table 1: Sites with Planning Permission

LP Number	Planning Ref	Approved Date	Address	Housing Capacity	Site Info
9	1106/20	18/02/21	193-207 High Road, Ilford (Harrison and Gibson)	330	Approved March 2019. Section 73 application approved Feb 2021. Demolition of existing structures commenced Jan 2022.
13	0229/12	30/03/12	226-244 High Road, Ilford "Metro Tower"	124	2151/18 is a new application. Appeal refused for 4462/16. However, 0229/12 is lawfully commenced. Site is presently for sale.
37 (Part)	4557/18	15/09/20	Bodgers, Station Road, Ilford	370	42 storey tower. Initially construction expected to start in July 2020. No application to discharge conditions.
51 (Part)	4570/18	15/09/20	Recorder House, 531-549 High Road, Ilford	134	15 storeys; offsite affordable housing linked to Bodgers. Initially construction expected to start in March 2020. No application to discharge conditions
10 (Part)	0337/19	15/02/21	Investec site (74-76 High Road, Ilford)	117	Developer currently securing vacant possession of site

Table 2: Sites without Planning Permission (Allocated sites in Redbridge Local Plan)

LP Number	Address	Housing Capacity	Site Info
195	320 New North Road, Hainault	70+	Low-rise purpose-built offices and parking in suburban location, Subject of pre-application discussions.
103	Woodford Avenue/ Eastern Avenue Corner, Gants Hill	113+	Town centre site; retail parades with residential above on corner of major junction, and garages / snooker hall to rear. Multiple land ownerships.
120	Travis Perkins and South Woodford station Car Park, South Woodford	141+	Site partially in town centre; ownership / use mostly split between TfL owned station car park and builder's merchants. Small portion of site comprises Woodford Liberal Synagogue. Potential to incorporate additional land including former postal sorting office and Marlborough Business Centre

5.2.6 Focusing on the sites outlined in the tables above a range of activities will be undertaken to encourage developers and landowners to discuss challenges to delivery and work with the Council to try and put forward practical solutions to overcome the delivery obstacles.

5.2.7 There will be a series of one-to-one meetings with developers and landowners to understand barriers to delivery and seek ways to start works on site.

5.2.8 The Council will also continue to contact all developers of major development sites where there has recently been a pre-app meeting, but there has been no further contact with the planning department. The purpose of this follow up will be to ascertain when the site will be brought forward and any obstacles to an application being submitted.

6.0 Timeframe:

Table 3: Timescales

Action	Timescale
One to One meeting and follow up actions.	Spring- Autumn 2022
Formally start Local Plan Review (Subject to Cabinet sign off)	Summer 2022

7.0 Implementation Monitoring and Review

7.1 Monitoring of the measures employed by the Council to stimulate housing delivery will continue to be assessed through the Local Authority Monitoring Report.

7.2 The Councils Strategic Planning Panel will receive regular reports on progress on the developer outreach programme and the Local Plan review.