

London Borough of Redbridge Housing Delivery Test Action Plan January 2019



Cover image: Proposed Harrison Gibson redevelopment, AWW Architects

1 Introduction and Background

- 1.1. The London Borough of Redbridge has prepared a Housing Delivery Test (HDT) Action Plan to provide an overview of housing delivery within the borough. This includes an analysis of housing delivery and barriers to delivery and actions necessary to increase delivery in the future. It is a live document that will be monitored and updated annually following the publication of HDT data each November.

Why is the HDT Action Plan Being Prepared?

- 1.2. Housing supply and the persistent failure to build sufficient housing is a national issue affecting the economy, health, productivity, and wellbeing of individuals and the nation as a whole; with particularly chronic pressures felt across London, including in Redbridge. As such, the Government has increasingly prioritised housing delivery within planning policy.
- 1.3. In February 2017 the Government published the Housing White Paper “Fixing our broken housing market”, which proposed a new initiative to measure the performance of local authorities via a Housing Delivery Test. This has been taken forward as part of the revised National Planning Policy Framework (NPPF) that was published in July 2018.
- 1.4. The consequences of failing the Test are set out in the NPPF. These apply until subsequent Test results demonstrate that delivery has recovered in subsequent years:
 - a) All LPAs with a Test result of less than 95% must prepare an Action Plan within six months. LPAs can prepare an Action Plan at any time, irrespective of whether it passes or fails the Test.
 - b) All LPAs with a Test result of less than 85% must provide a 20% buffer to the Five-Year Land Supply (this has already happened in Redbridge through the Local Plan process)
 - c) The Presumption in favour of sustainable development (the Presumption) applies if the test result is less than:
 - i) 25% in November 2018
 - ii) 45% in November 2019
 - iii) 75% from November 2020 onwards.

How is the HDT Measured?

- 1.5. Full details of the method for calculating the HDT are specified within the ‘Housing Delivery Test Rule Book’ and Planning Practice Guidance. The data used to assess delivery is Ministry for Housing, Communities and Local Government (MHCLG) statistics for the total net housing completions in a local planning authority (LPA) area over a rolling three-year period. This includes student accommodation and other communal accommodation, using a ratio to adjust for occupancy
- 1.6. Financial years are used for monitoring; and test results will be published annually each November by MHCLG.
- 1.7. In Redbridge, this means measuring against the annual London Plan target of 1,123 homes per annum. The Housing Delivery Test results published each November will then be used to show housing delivery against this figure and are expressed as a percentage of the target.
- 1.8. Redbridge will however see a change to its housing targets from 2019/20, with a proposed target of 1,979 homes per annum in the draft London Plan.
- 1.9. In the absence of an apportioned target within the London Plan or an up to date Local Plan, the housing need figure new standard Objectively Assessed Need (OAN) methodology would be used for HDT purposes. In Redbridge, this figure is 2,981 homes per annum.

How Does Redbridge perform against the HDT?

- 1.10. Based on performance over the preceding 3 years, Redbridge avoids the Presumption in Favour within the Housing Delivery Test in November 2018 when considered against its adopted Local Plan target of 1,123 (the same as the London Plan target).

1.11. Redbridge is, however, required to produce an Action Plan and to add a 20% buffer onto the Five-Year Land Supply. The 20% buffer has however already been added as required by the Inspector during the Local Plan process.

Year	Delivery figures (London Development Database)	Annual Housing Target (London Plan)
2015-16	520	1123
2016-17	810	1123
2017-18	462	1123
<i>Total over 3 years</i>	<i>1792</i>	3369
<i>25% of target</i>	---	842
HDT (%) result	53.2%	Passes in November 2018

1.12. Based on completions that have already happened in or are expected within the current (2018/19) monitoring year, the Council is expecting to meet the 45% threshold for the Presumption in Favour in November 2019.

1.13. However, the 75% threshold is unlikely to be met in November 2020; this will also be when the new London Plan targets begin to apply to completions within 2019/20 and subsequent years. The combination of a high threshold and increased London Plan targets are likely to present a significant challenge for the majority of outer London Boroughs and the Council will work with them to share best practice.

Development Plan Status

1.14. The current adopted development plan comprises:

- London Plan (2016)
- Redbridge Local Plan (2018)
- Redbridge Minerals Plan (2012)
- East London Waste Authority Joint Waste Development Plan (2012)

1.15. Redbridge adopted its Local Plan in March 2018 and the current planning policy focus is the preparation of new SPDs and a revised CIL Charging Schedule.

About the Action Plan

1.16. An Action Plan is intended to be a practical document aimed at increasing delivery that is locally specific, and underpinned by local evidence and research. In order to be effective, linkages to other key council strategies are important.

1.17. The document is intended to assist in delivering a key Strategic Objective in the Local Plan, that of delivering the annual housing target of 1,123 homes. It also supports delivery of the Housing Strategy, Regeneration Strategy, Property Strategy, Corporate Strategy and other Council priorities and activities.

The Action Plan and other Documents

Corporate Document	Overlap with Action Plan
Local Plan 2015-2030 Adopted March 2018	Action Plan supports delivery of 1,123 net housing completions per annum.
Housing Strategy 2017-22 Adopted July 2017	Action Plan supports the first theme of "Increasing Housing Supply" including: * delivering genuinely affordable housing; making best use of council owned land and assets to maximise the delivery of affordable housing; delivering at least 350 homes on HRA land from 2017-2022 * Setting up Redbridge Living and using it to contribute towards overall and affordable housing provision * Develop relationships with Registered Providers to ensure their contribution to housing supply in Redbridge
Regeneration Strategy 2017-2027 Adopted December 2017	Action Plan supports key objectives of number of sites coming forward and number of new homes created in town centres. Also supports 13,500 homes in 2017-2027 including 4725 affordable homes. Supports 150 HRA homes by 2020 and 350 Redbridge Living Homes by 2021. Supports delivery chapter of Regeneration Strategy, which emphasises role as Local Planning Authority, Highways Authority, Licencing Authority, landowner and investor. Ilford is a particular focus of this document. Supports HRA programme and Redbridge Living. Work Redbridge provides job brokerage and apprenticeship / local labour provision that can be included within Section 106 agreements on major developments. 13,500 new homes over a 10 year period of 2017-2027 equates to £1.7 billion of construction spending.
Property Strategy (To be adopted early 2019)	Property strategy currently under development (Strategic Property Review was presented to Cabinet in November 2018 which will inform the Property Strategy, to be presented to Cabinet in early 2019)
Corporate Strategy 2014-2018 (Adopted 2014)	Action Plan supports delivery of Ilford Housing Zone; supports activity of Redbridge Living; supports an increased supply of housing across all tenures.
Ilford Prospectus (Adopted 2017)	Action Plan supports delivery of sites in Ilford.
Leader's Manifesto (2018)	Action Plan supports delivery of 1,000 affordable homes in 4 years.
Borough Plan	Supports overall objectives of housing delivery and balanced communities

Preparation of the Action Plan

1.18. The Action Plan has been produced by the Planning Policy team who have collaborated with, the Planning Advisory Service (PAS), Hyas consultancy and other pilot boroughs in the production of this document.

1.19. The Action Plan will continue to be developed in conjunction with other key service areas including Regeneration, Housing, Property, and Highways to ensure that it fully reflects how housing delivery is going to be achieved.

2 Redbridge Housing Delivery Analysis

2.1. There are two main considerations of housing delivery, firstly the overall housing target and how well Redbridge has delivered against this, and secondly, the housing market in Redbridge.

Local Context

2.2. Redbridge is a borough in the north east of London, covering an area of 65.41 km², and has an estimated (mid 2017) population of 301,785.

2.3. Redbridge is a primarily residential borough in north east London. 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 2.1) shows the key transport links and growth areas within the borough.

Figure 2.1 - Redbridge Local Plan Key Diagram



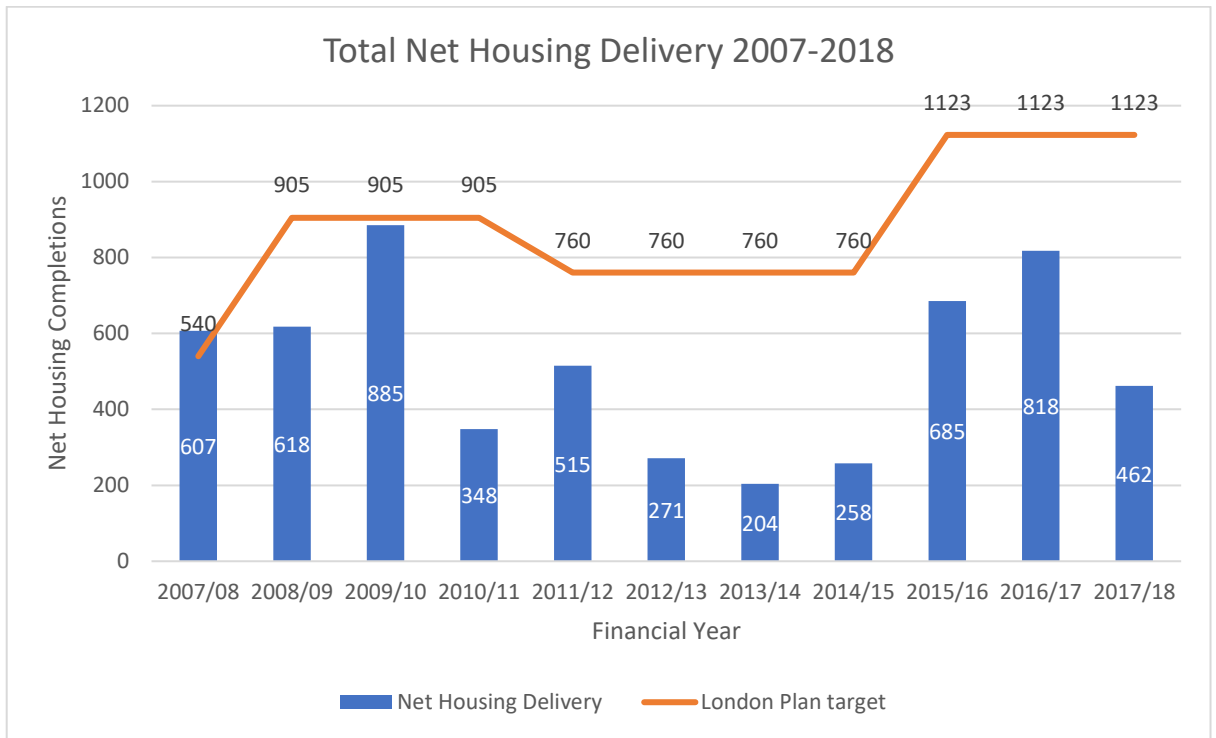
- 2.4. The borough also includes generous green spaces including Valentines Park, Fairlop Waters, and parts of Epping Forest including Wanstead Flats; as well as well-regarded state, state grammar, and independent schools.
- 2.5. All these make it an increasingly attractive location and have resulted in a buoyant local property market. However, it has faced a combination of London-wide and more locally specific housing, demographic, and development challenges that have necessitated this Action Plan.
- 2.6. The borough's built fabric is described more comprehensively in the Redbridge Characterisation Study (2014), but consists largely of Victorian and Edwardian terraces; and 1930s and post-war semi-detached housing, interspersed with a stock of predominantly low-rise purpose-built flats along with flat conversions in larger, older properties.
- 2.7. The existing housing stock is overwhelmingly privately owned, with 94,160 private sector dwellings, 4,460 Council dwellings, and 4,840 Registered Provider dwellings; and an overall stock of 103,460 dwellings. Owner occupation is high but there has been a significant shift to the private rented sector in recent years.

- 2.8. Redbridge has recently (March 2018) adopted a new Local Plan. This plan provides an up-to-date planning framework and demonstrates a pro-active approach to growth, directing the majority of new housing to the borough's five Investment and Growth Areas (Ilford, Crossrail Corridor, Gants Hill, Barkingside and South Woodford). The Sustainability Appraisal showed that this combination of intensification and limited green belt release was the most sustainable option.
- 2.9. Ilford and the Crossrail Corridor are by far the largest of the Investment and Growth Areas in regard to the number of homes expected from allocated sites, and are also expected to contribute a significant proportion of windfall sites. Crossrail will provide a transformative effect to the actual and perceived connectivity of these sites to central London.
- 2.10. 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.
- 2.11. Redbridge has increasing housing demand as evidenced by the fact that it is the:
- London borough with the fastest increasing property prices (year to February 2018).
 - English local authority with the 4th largest projected percentage increase in population.
 - English local authority with the 2nd largest average household size (2014).
- 2.12. In combination with this, Redbridge has not delivered its annual housing target since 2006/07, and its long-term performance at meeting both housing targets and housing need 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 compared with local earnings is worse than for London as a whole.
- 2.13. The Council has been proactive at both member and officer level at increasing the level of delivery, with the establishment of a high-level Growth Board within the Council providing a steer on strategies relating to development. The Leader of the Council has assumed the Growth and Leisure roles within his portfolio.
- 2.14. Redbridge has 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. Some sites were identified as part of the 2008 LDF, but no or little progress was made in the intervening time period, largely due to the recession.

Delivery against Targets

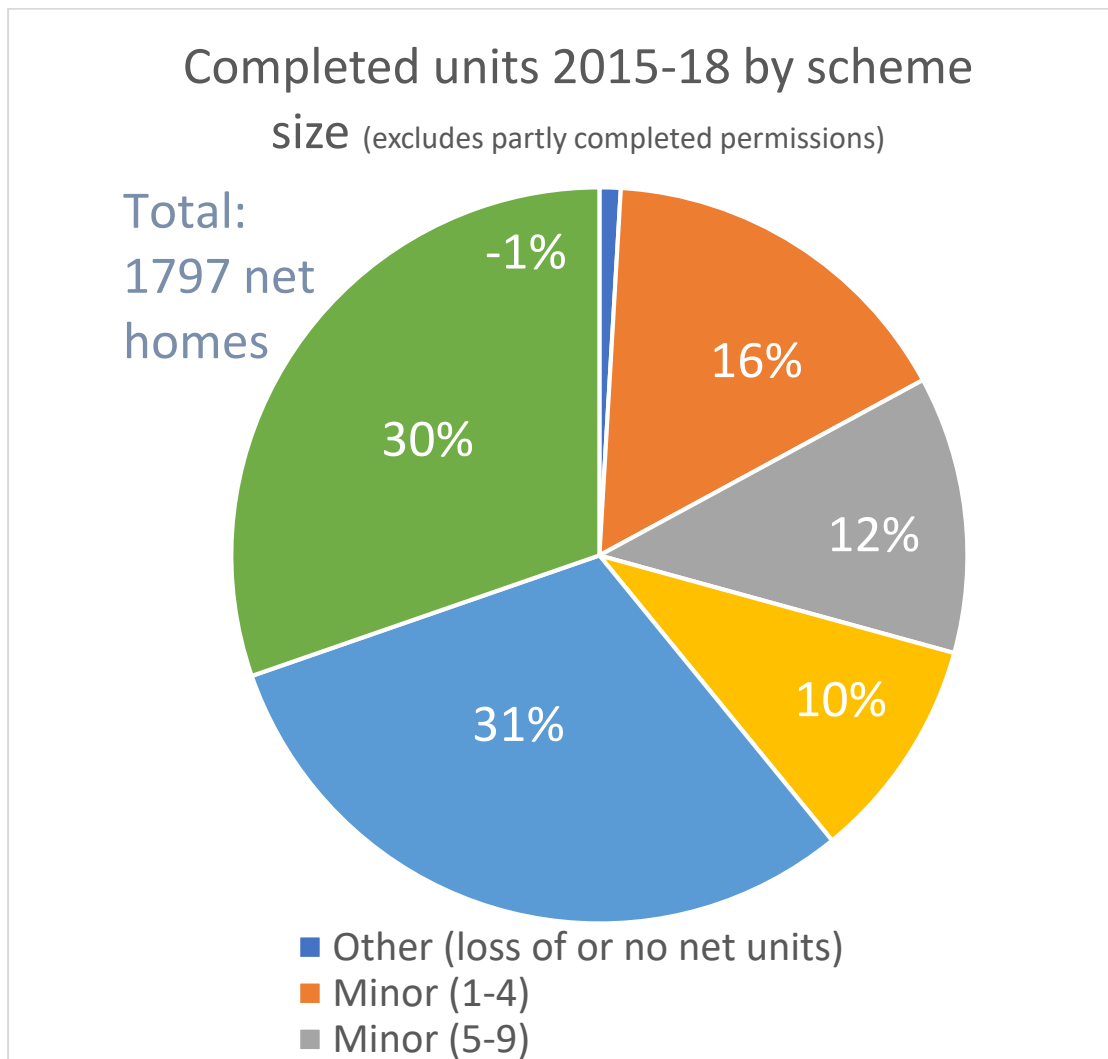
- 2.15. Redbridge has significantly underdelivered against its housing targets – the last time it met its annual completions target was in 2007/08 when the target was less than half its present figure. Housing completions actually hit their lowest point in 2014/15, several years after the 2008/09 recession. However, they have recovered significantly since then, as shown in Figure 2.2.

Figure 2.2 - Net housing delivery 2017-18



- 2.16. The composition of the housing delivery consists roughly equally of small sites under 25 units, major sites up to 150 units, and strategic sites over 150 units (Figure 2.3). This is a higher proportion of small sites being delivered than the housing trajectory suggests and would seem to indicate that there is a steady, if limited, stream of small sites delivery irrespective of the outcomes of larger sites.
- 2.17. Net non-conventional delivery is negligible within Redbridge (consisting mostly of C2 care facilities for local need) and long term vacant dwellings are low, comprising 462 properties on the 2nd October 2017, the last date for which figures are available.

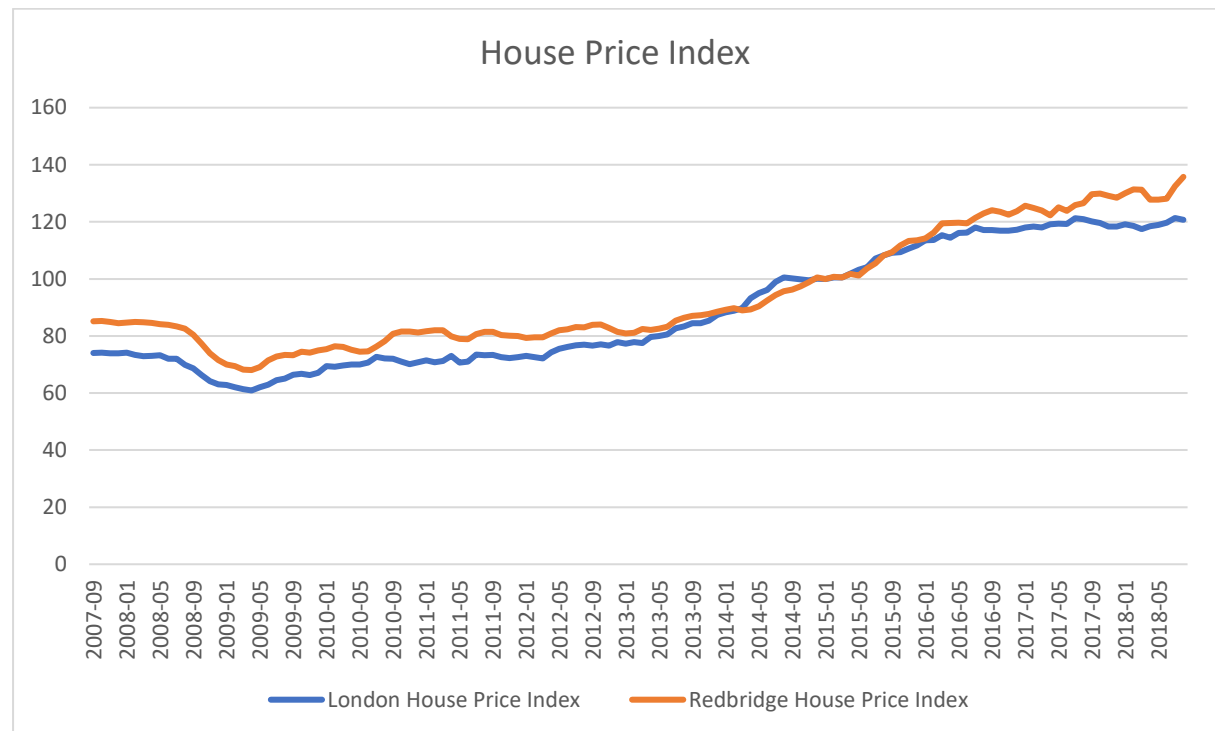
Figure 2.3 - Net housing completions 2015-18 by scheme size



Nature and Composition of the Housing Market

- 2.18. Redbridge has the fastest growing house prices in London – whilst across London prices are stabilising due to factors including a reduction in cash buyers and buy to let mortgages, and first-time buyers hitting borrowing limits; prices are still growing in Redbridge as the area has good transport links, good amenities, and high demand relative to supply (Figure 2.4).
- 2.19. Brexit will result in unpredictable economic and demographic impacts within Redbridge. This may result in reduced net migration to Redbridge, along with reduced demand for housing at the lower end of the market. However, Brexit is also likely to result in labour shortages and increased costs in certain sectors, including construction – making increasing housing delivery more challenging.

Figure 2.4 - House Price Indices for London and Redbridge (2015 baseline)



Housing Pipeline and Allocated Sites

- 2.20. In October 2018, there was a pipeline of 3,150 consented net conventional homes, of which 1,680 had not started and 1,470 were part of schemes that had started.
- 2.21. This pipeline is relatively small compared with the overall housing requirement, however this reflects the very limited number of large “outline” planning permissions that have been granted in the borough; whereas some outer London boroughs have very large outline permissions (e.g. Barking Riverside, Greenwich Peninsula).
- 2.22. The housing pipeline in Redbridge consists predominantly of a mixture of medium to large sites, largely concentrated in town centres and the Crossrail Corridor, alongside small infill sites that are relatively dispersed across the borough. The delivery of the plan does not rest on any individual project; the largest allocated site has a capacity of 800 units. This therefore means that the 1000+ unit schemes that were examined as part of the Letwin Review into build out rates are not represented within the Local Plan.
- 2.23. However, as part of the same review, the separate Molior database showed an even lower build out rate in London for schemes of 500 or more. There is a clear negative correlation between scheme size and build out rate; which the mixed nature of site allocations in Redbridge helps to mitigate against. The review also considers different types of homes and tenures; greater diversity of housing product within a scheme helps to increase market absorption, because market sales are typically the “slowest” type of housing product to be absorbed; affordable units and market rental units are more readily taken up by occupiers.
- 2.24. Given the difficulty of bringing larger allocated sites forward, small sites account for a relatively large percentage of housing supply – 28% of homes in schemes completed from 2015-18 were in small developments of 1-9 units. This type of development is important for SME housebuilders, however notwithstanding the ambitions of the draft London Plan, increasing supply from this route presents particular challenges.
- 2.25. Redbridge is an outer London borough with a mixture of urban and suburban typologies; allocated housing sites include:
- Large “big box” retail / storage warehouses;
 - Town centre redevelopment on existing retail / office premises;
 - Car parks (either multi-storey town centre car parks, or surface parking associated with out of town retail)

- Green belt release sites with varying levels of previous development;
 - Smaller scale infill and conversions; and
 - Council owned garage sites and estate facilities
- 2.26. There is a wide variety in regard to types of site in terms of ownership, size, and potential densities and typologies. It should however be noted that the small social housing stock within the borough limits the potential for the Council to increase housing supply through estate regeneration.
- 2.27. The large number of site allocations within the Local Plan, along with how their potential was assessed, meant that relatively conservative assumptions were made regarding site capacity. The “density matrix” from the 2013 London SHLAA (a variant of that contained within the London Plan) was used to calculate site capacity for most Local Plan allocations where more detailed information, such as a planning application or pre-application proposal, was absent.
- 2.28. The 2013 London SHLAA assumes lower densities than the density matrix the 2017 London SHLAA uses. Additionally, average densities on delivered large schemes across London have exceeded those assumed within the density matrix for some time.
- 2.29. This calculated approach provides a robust overall figure for development potential across the borough, but more detailed massing / master planning exercises (including emerging pre-apps) for individual sites is showing that additional capacity exists within existing site allocations. For example, LP Site 51 has an indicative total of 180 new homes across 3 adjoining sites; however, the total delivery across the 3 sites is expected to be 350 new homes based on approved and outstanding planning applications.
- 2.30. Other emerging policies, such as changes to parking standards and the “urban greening factor” within the draft London Plan; as well as factors such as dwelling size mix, will also have an impact on site capacities.
- 2.31. The Council is using a variety of tools including VU.City 3D modelling software to assess the potential for increased densities and determine the likelihood of cumulative impacts from adjacent sites. The Council will use VU.City as a tool to help ensure that proposals for adjoining sites in separate land ownerships do not prejudice the development of the adjoining land.
- 2.32. The potential exists for additional housing sites to be allocated in the long term through Local Plan reviews, the Brownfield Land Register, and the SHLAA. This will help to ensure that the five-year land supply can be maintained and could be used to mitigate against any shortfall in delivery on other sites (including small sites as defined in the draft London Plan).
- 2.33. The Council has greater ambitions on affordable housing and pushed to secure funding for 600 affordable homes through the GLA programme. This forms part of the manifesto commitment to securing the delivery of 1,000 within the current administration. This demonstrates the significant political weight being placed on affordable housing delivery in the borough.

Infrastructure

- 2.34. Redbridge has a quickly growing population, and has particular social infrastructure needs in relation to schools and healthcare (such as a number of GPs per capita below the London average) and these pressures in turn reduce local support for housebuilding due to the fear of increased pressure and competition for services.
- 2.35. Funding cuts from central government and the limited power of local government to raise and spend are largely to blame for service pressures that lead to an anti-development attitude.
- 2.36. Failure to build sufficient housing not only means losing out on increased council tax receipts as well as planning gain, but also that household formation (e.g. amongst younger people living with parents or sharing with others) continues to be suppressed, meaning larger numbers of people using public services per council tax liable dwelling.
- 2.37. As well as revenue funding cuts, capital grant funding for new public facilities is also difficult to secure. The Infrastructure Delivery Plan which supports the Local Plan includes £428 million of infrastructure requirements at 2015 prices; this does not include a significant number of uncosted schemes. The current borough CIL charge can realistically only fund approximately 15% of identified infrastructure requirements. Although Section 106 can also be used in some cases, it is clear that other sources continue to be required to supplement planning gain.

- 2.38. To help improve this, a CIL charging schedule review has identified the potential for rates to be increased from a flat rate £70/m² (with indexation the charge is currently c. £98/m²) for residential uses, and multiple charging zones; with lower rates for commercial use classes. The Council is looking to introduce revised CIL rates in late 2019.
- 2.39. Redbridge also has issues with transport capacity. Whilst Crossrail will to some extent alleviate this and provide additional capacity for housing growth, the Central Line can only accommodate limited growth until it is upgraded in the late 2020s as part of the "New Tube for London". Whilst radial links to Stratford and central London are very good, if crowded; orbital public transport links between different areas of the borough require additional improvements. Therefore, continued planning policy input is needed into the Council's funding bids to TfL, to ensure that the proposed transport improvements can support housing growth.

Viability and development costs issues

- 2.40. Redbridge has locally specific challenges for viability; as 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.
- 2.41. Additionally, Ilford and the Crossrail Corridor has a large number of proposals for tall buildings. These require careful consideration, as the expectation of increased housing yield results in higher land values, whilst the additional engineering and logistical requirements result in increased build costs; which means that proposals for tall buildings may have marginal viability.
- 2.42. In order to secure permission, developers may offer affordable housing even where a viability assessment says the scheme cannot support one; potentially resulting in a permission that is unviable to implement.
- Data/information relating to S106s (as there may be relevant triggers on numbers of homes) or CIL contributions.
- 2.43. Redbridge was the first borough to introduce a CIL charging schedule, however the low build out rate means that contributions to date have been relatively low compared with other London boroughs. Additionally, new housing delivered through the prior approval process is not required to contribute CIL.
- 2.44. New staff resources, software, and improved co-ordination with case officers and finance and legal colleagues, have all contributed to improved CIL collection with a significant backlog of outstanding monies collected in recent months.
- 2.45. Redbridge is fortunate in being able to demonstrate a Five-Year Land Supply, however many of the sites that make up the present five year land supply have either been identified through the SHLAA, or allocated through the Local Plan or earlier DPDs, for far longer than five years; largely because the previous Site Allocations Document was published in 2008 as the recession started to have an impact on the construction sector and housing market.
- 2.46. Whilst the Five-Year Land Supply is theoretically deliverable without intervention, it is quite clear that rising residential property values and the allure of Crossrail are not necessarily themselves enough to bring these sites to the stage of pre-application discussions. Furthermore, the slim pipeline of consented schemes means that, given the timescales involved with constructing both large and small sites, the impact of speeding up implementation will be relatively limited.
- 2.47. The Redbridge Local Plan contains a housing trajectory covering the 2015-2030 period, however the plan was adopted in 2018. The AMR (Authority Monitoring Report) includes updates on the housing trajectory to ensure that the Council continues to maintain a Five-Year Land Supply, taking completions and emerging proposals into account.

Stalled Sites

- 2.48. Stalled sites are where a site that has been identified for development (or where development has been approved or started) is subject to significant delay. This delay can occur at any stage of the development cycle, from conceptual design to scheme fit-out. However, the Action Plan will focus on sites with planning approval where delays happen before and during the main construction phase.

- 2.49. Stalled sites can be caused by client side, contactor side, or third party (such as a local authority) issues and delays. By far the largest cause is financial, where either the client or contractor is unable to secure sufficient finance at the right time.
- 2.50. Section 106 agreements are typically only used for schemes of 10 units or more, where policy requires affordable housing. Delays usually come from failing to clearly set out the information required from the developer, a lack of capacity within the Council's legal team, and the time taken to draft and agree the wording of the Section 106 agreement.
- 2.51. To help resolve this, the Council is being clearer regarding the required viability information with the new Local Planning Application Requirements List published in November 2018, and is developing proformas for PPAs and Section 106 agreements with GLA assistance which will expedite the drafting of agreements.
- 2.52. Section 38 agreements (for the Council to adopt a road within a development as a highway) and Section 278 agreements (for a developer to undertake works within the public highway) are other potential sources of delay, particularly for larger schemes where internal consultation with Highways will occur in parallel to the planning application process.
- 2.53. Around a third of units are delivered as part of schemes referable to the Mayor on size criteria (over 150 units). Some smaller schemes are referable on the basis of height. This process of referral to the Mayor, both when an application is submitted and when a Planning Committee resolve to approve a scheme, presents a potential opportunity for delay.
- 2.54. Invariably there will be practical issues when implementing certain consents that cause delays on both large and small sites, and often these will necessitate revised planning applications which itself can cause delays. For example, in one case an upward extension to provide flats above an existing retail building was approved, but structural issues necessitated a new application ([reference 3900/18](#)) for a demolition and new build. A larger pipeline of consented schemes reduces the risk to our housing delivery should any one site fall into difficulty.
- 2.55. Crossrail is justifiably a considerable factor in increasing development, but it is also a driver of land speculation, with development on some sites only likely to occur in the early 2020s following the opening of the line. This is reflected in a GVA study on Crossrail, ([link https://learninglegacy.crossrail.co.uk/wp-content/uploads/2018/07/4D-003-crossrail_property_impact_regeneration_study.pdf](https://learninglegacy.crossrail.co.uk/wp-content/uploads/2018/07/4D-003-crossrail_property_impact_regeneration_study.pdf)) which explains how development in outer London is more occupier led than developer led - in 2017 Crossrail was "Reinforcing the direction" of existing development; but by 2026 it would be "Creating Change" in Ilford. Major sites currently in pre-application discussions will be likely to contribute to this change in direction

3 Response and Actions

- 3.1. This section creates the opportunity to raise the profile of housing delivery across the Council and ensure that it is recognised as not just an issue for planning. The Action Plan has wider implications for the Council in terms of meeting corporate growth ambitions.
- 3.2. The Council is already looking at ways in which it can accelerate housing delivery. The Action Plan provides more detail on these existing measures along with other interventions:

- Action Points
- **Implementing relevant actions** from the Council's recent PAS Peer Challenge Review. A number of recommendations from this Review relate to improving the performance of the Planning Service including improvements in service delivery, pre-application service and use of planning performance agreements (PPAs) all of which will play a part in increasing the pace and certainty of delivery;
- **Offering more pre-application discussions** to ensure site specific issues are identified early

- 3.3. In the past Redbridge was not a particularly proactive borough in terms of planning, however a PAS Peer Review has supported wider service changes that will allow for more focussed and resourced Development Management processes.
- 3.4. The Council is now offering an enhanced pre-application offer, with Planning Performance Agreements (PPAs) requested for large major and strategic applications. The agreement helps to facilitate a smooth transition from pre-application discussion to a full or outline submission, with fees involved allow the Council to properly resource a series of pre-application meetings, allowing for revised layouts and designs to be presented and for officers from a range of service areas to attend as necessary.

- Action Point
- **More proactive approach to developer and land owner engagement.** Where sites have 'stalled' the Council will contact site owners/developers to understand why, obtain up-to-date information on the build out of current sites, identify any barriers and discuss how these can be addressed

- 3.5. Analysis has shown that, because the borough has a five-year land supply (including a 20% buffer) but a very small pipeline of consented schemes (considering the timescales involved in delivering individual sites), a primary action should be ensuring that allocated sites that have been rolled over from previous allocation documents are targeted for redevelopment and landowners contacted.
- 3.6. In some case the nature of the site (multiple landownerships) may require the Council to undertake a greater level of development brief work itself, or else consider how the site could be brought forward in stages.
- 3.7. Redbridge is also establishing a developers / agents forum, which will meet on a quarterly basis and allow for developers to voice issues of common concern, as well as the Council to provide updates on local plan documents and service changes. This will provide improved intelligence on market conditions that can affect delivery from SME developers in particular.

- Action Point
- **Determining the possibility of prioritising certain applications,** simplifying conditions, phasing condition discharge on approved sites and reviewing standardised conditions

- 3.8. At present the only applications that are specifically prioritised are applications for school expansions. This is due to the importance of ensuring new school places are ready for the start of the academic year.
- 3.9. Redbridge does not currently offer a premium "fast track" application service, whereby a faster turnaround is provided whilst still being subject to the mandatory 21 days public consultation. This option may help to speed up development in certain circumstances, especially where the principle of development has already been agreed but changes need to be made to the approved plans.
- 3.10. Planning conditions were recently updated as part of the Local Plan implementation, however this was directed at updating the references to policy numbers, and there is potential for a wider review of the number of, scope of, and phasing of conditions, as well as how quickly applications to discharge conditions can be processed.

3.11. Section 106 agreements can also be a source of delay, especially between the resolution to approve at planning committee and the sign-off of a planning permission.

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| <ul style="list-style-type: none">▪ Action Point▪ Ensuring adequate resourcing for Section 106 agreements and working with the GLA on proforma agreements |
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Redbridge Living

- 3.12. Financial restrictions relating to traditional “council housing” mean that local authorities are increasingly delivering housing through wholly owned development companies. Meanwhile, budgetary pressures mean that local authorities are seeking to rationalise their operational estates to reduce running costs.
- 3.13. Redbridge has consolidated both its customer facing and “back office” functions into a smaller number of sites, with hot desking providing more efficient use of floorspace. This has allowed the release of surplus office floor space, which will be redeveloped into housing through Redbridge Living.
- 3.14. Redbridge Living will also deliver housing on other Council owned sites such as underutilised car parks. An estimated 350 homes can be delivered on the initial 3 sites.
- 3.15. In addition, the Council has recently carried out a Strategic Property Review to support the preparation of the Property Strategy. The review, considered all Council assets apart from those within the HRA and public highways and sought to provide a consistent assessment of all opportunities across the portfolio.
- 3.16. Through the Property Review, 14 largely standalone sites were identified and considered suitable for redevelopment. A number of the sites benefit from allocations within the Local Plan which would support their redevelopment for a range of uses including the delivery of the multi-service Community Hubs. However, the majority are “windfall” sites not allocated within the Local Plan and represent new housing capacity as well as increased certainty of delivery.
- 3.17. Initial assessments suggest that these sites have the potential to accommodate between 600 and 1,000 new homes. The majority of the sites are considered individually capable of supporting the development of between 30 and 150 new homes which makes them well suited to development through Redbridge Living. Cabinet approval was given in November 2018 for these sites to be offered for consideration by Redbridge Living to establish whether a viable development can be brought forward. This certainly represents a step-change in the way the Council is looking to accelerate housing delivery.

Profile and Publicity

- 3.18. There is a general perception within the borough that Ilford town centre used to be a primary retail destination, but that the regeneration of Stratford has drawn customers away. Stratford is also attracting large volumes of residential development as well as student accommodation.
- 3.19. Ilford cannot compete against Stratford on its own terms; the latter is considered to have the potential to be an International centre; therefore, it needs to offer something different. Work is ongoing with The Spark, a meanwhile use project incorporating a food market and food gallery, as well as temporary accommodation.
- 3.20. Raising the profile of Ilford amongst developers and investors will require a different approach to that required to raise the profile amongst potential residents. The Ilford Delivery Prospectus provides greater detail around the Council’s ambitions for different sites and areas within Ilford town centre. This is to be accompanied with further events similar to the Ilford Manifesto launch event held in the Shard.
- 3.21. A more public focussed campaign could include press campaigns (for example, highlighting major new schemes in the property section of the Evening Standard with an emphasis on affordability, accessibility, and local schools and parks). It should however be noted that people moving to the borough are only a partial component of overall housing demand.

3.22. Private developers are responsible for a significant proportion of affordable housing delivery through the cross-subsidy mandated through Section 106 agreements, therefore strong demand for both market sales and build-to-rent within major projects will help to support the delivery of affordable housing, especially with any additional contributions from a late stage review.

- Action Point
- **Capitalising on the arrival of Crossrail in 2019** which will be a catalyst for change and significant growth in the borough. The implementation of Crossrail is anticipated to significantly increase the supply of housing in the borough, particularly in the Ilford and Crossrail Corridor Investment and Growth Areas;

3.23. Crossrail is a major boost to development, however there is a risk that on some sites it has encouraged land speculation and that development will not take place until after Crossrail has been open for some time.

- Action Point
- **Reviewing the Redbridge CIL** to enable the Council to collect more money to spend on strategic infrastructure projects, which will help with unlocking difficult sites;

3.24. Redbridge is currently reviewing its CIL Charging Schedule with a view to increasing the overall revenue from CIL, in light of its substantial social infrastructure requirements and funding gap. A review would allow for changes in development costs and sales values since 2012 to be fully accounted for, and would also allow for different charging rates for different uses and locations.

- Action Point
- **Availability of additional funding** through regeneration bids, Mayor's Good Growth bid. Redbridge has utilised funding from a variety of sources to advance delivery on challenging sites – whilst the "Housing Zone" was an initiative of the previous Mayoralty and no new schemes are being supported through it, there are new opportunities for certain types of schemes including the lifting of the HRA borrowing cap. However, these lack the overarching scope and flexibility of the Housing Zones, and greater effort may be required to match developments to the most appropriate source of funding.

Housing Zone case study

3.25. The Britannia Music Site is the site of the former distribution centre of the Britannia Music Club, a mail-order company which closed in 2007. The site was acquired by Durkan Ltd, who worked with JLL to bring it to market as an investment opportunity. The site consisted of a 5 storey office block, 2 storey warehouse, and parking, which was subsequently cleared. Durkan worked on a planning application and submitted in 2008 for a residential led mixed use development of 345 flats. This scheme was approved in 2010, however due to the financial crash and access to development finance site remained "stalled" for a number of years.

3.26. In 2016, Durkan secured a £25 million loan from the GLA as part of the Ilford Housing Zone and this was the first loan transaction for London borough schemes. During the time of accessing the GLA loan finance the Build to Rent model was progressing fast regionally and nationally that delivered high quality private rented accommodation near to transport infrastructure. In March 2017, M&G Real Estate - one of the UK's largest property investors and Durkan signed a £71.4 million deal to finance and deliver 206 of the total units, as homes for private rent. The finance arrangement with Durkan and M&G enabled the scheme to relieve an amount of debt borrowing and did not require the full GLA loan.

3.27. Britannia Music Site is a landmark development at the heart of the Council's regeneration of Ilford Town Centre. It will feature 354 new homes in a mix of one, two and three bedroom apartments in a range of blocks set around a new public courtyard, including a 24 storey tower; providing homes for market sale, private rent, affordable rent and shared ownership. The development is located within two minutes' walk of Ilford station, newly rebuilt for Crossrail with a new Southern station entrance. Future occupiers will only be 17 minutes away from Canary Wharf, 9 minutes from Stratford and 14 minutes from Liverpool Street Station. The scheme is currently on track for an early 2020 completion and will contribute to a total of 617 homes with two other housing zone schemes within the Ilford Hill area.

4 Implementation Monitoring and Review

- 4.1. This section includes details of how the actions set out in the Action Plan will be implemented, monitored and reviewed, in addition to relevant reporting arrangements.
- 4.2. The Council has established a Growth Board which provides steering and governance at the highest level, the decision-making process for the Action Plan will rest with the relevant Cabinet member.
- 4.3. The Action Plan will be a publicly accessible document that forms part of the wider workstream of the AMR (which monitors housing delivery and performance of Local Plan policies). Implementation will be the responsibility of a dedicated Working Group made up of officers from Development Management, Planning Policy, Housing, and Regeneration and Property.
- 4.4. There is additionally a **meta-action** relating to monitoring itself and how monitoring will need to be more efficient in the context of both an increased number of developments that need to be monitored; and increased expectations around the use of and review of that data.

Table 4.1 - Actions and Monitoring

Issue	Analysis	Response	Action who/what/when/why/how	Key roles and responsibility
Issues bringing major sites forward	Many sites allocated in 2008 or earlier have not been brought forward	Proactive contact with developers / landowners / agents	Managers will formally write to developers / agents of sites where it appears that construction activity has not started or has stalled It may be worth focussing on sites of 25+ units outside the Ilford IGA, as sites within Ilford are likely to come forward when Crossrail is operational. Agents and Developers forum will provide forum to discuss general issues with bringing sites forward In some instances the Council will seek to deliver sites directly through Redbridge Living, HRA, or a Joint Venture	Planning Policy Regeneration
Section 106	Some Section 106 agreements subject to considerable delays	Use standardised clauses, monitor progress and timescales of S106 agreements	DM managers / legal / case officers to agree target timescales for different types of application if not already in PPA Investigate use of S106 monitoring module in APAS to see if it can be used to monitor progress in preparing S106	Development Management Legal CIL/s106 Team

Issue	Analysis	Response	Action who/what/when/why/how	Key roles and responsibility
Conditions	Some conditions could be discharged at a different stage	New Local Planning Applications Requirement List will require more information up front	DM managers to discuss with case officers / service areas potential ways of staggering conditions and increasing “up front” information requirements. Conditions within decision notices / committee reports should be ordered by the stage at which they need to be discharged, with headings for clarity.	Development Management
Viability	Some typologies seen increasingly often (i.e. taller buildings) can struggle with viability around affordable housing	Ensure affordable housing requirements are applied consistently to ensure land markets factor this in. Ensure pre-apps explore alternative options that can improve viability	Ensure GLA compliant approach is used especially for referable applications Ensure cost implications are understood at early stages Proceed with CIL review Ensure full use of funding opportunities / bids are explored.	Development Management
Monitoring	Officer time used on monitoring with much manual data entry	Engage in London Development Database re-write	LPA to work with IT providers to ensure data can be uploaded to Redbridge	Planning Policy Team in coordination with LDD and IT providers

4.5. The delivery of the Housing Delivery Test Action Plan will be managed by the Planning Policy Team. The planning policy team will co-ordinate with other departments on the key actions outlined.

4.6. Suggested monitoring indicators should look at the entire development cycle and consider:

- Size of Five Year Land Supply
- Number of units currently in pre-application discussions
- Size of approvals pipeline (not yet started)
- Size of approvals pipeline (under construction)
- Number of net new units

4.7. The Action Plan will be an iterative process, published annually following publication of the housing delivery tests.

Appendix 1 – Table of Stalled Sites

LP Number	SHLAA Ref: No.	Address	Planning status	Ward	IGA	Potential Revised Capacity (Local Plan)	Local Plan Phase	Programme / Owner	Site Info
188	1326134	Ley Street Council Depot	Allocated	Newbury		279	2	Council Asset	Long term unrealised ambitions to redevelop site, issue of re-providing services elsewhere
68	1326241	645 – 861 High Road, Seven Kings	Allocated	Seven Kings	Crossrail	229	2		Rolled over LDF site, comprehensive development very unlikely
2 (Part)	17260333	Exchange Shopping Centre Car Park	Full Permission	Valentines	Ilford	214	1		Current consent unlikely to be implemented
117	1326191	Station Estate, off George Lane, South Woodford	Allocated	Church End	S Woodford	120	2		
103	1326005	Woodford Avenue/ Eastern Avenue Corner, Gants Hill	Allocated	Barkingside	Gants Hill	113	2		Site rolled over from LDF, in multiple ownership and no immediate prospect of development
219	1326116	177 - 185 High Road, Ilford (JD Sports/Boots)	Allocated	Clements-wood	Ilford	110	2		Scheme feasibility depends on Argos and Harrison Gibson sites due to proximity of tall buildings
194	1326169	Redbridge Station, Eastern Avenue, Redbridge	Allocated	Clayhall		92	1	LUL	Previous allocated site
86	1326062	Car Park adj. To Chadwell Heath Stn, Chadwell Heath	Allocated	Goodmayes	Crossrail	80	1		
218	13266116	187 - 191 High Road (Argos)	Withdrawn Application (4407/17)	Clements-wood	Ilford	80	1		Most recent scheme was unacceptable in regards to interface with Harrison Gibson
77	1326180	4-12 Cameron Road and 625-643 High Road		Seven Kings	Crossrail	73	2		Parade of shops with flats above, no prospect of

LP Number	SHLAA Ref: No.	Address	Planning status	Ward	IGA	Potential Revised Capacity (Local Plan)	Local Plan Phase	Programme / Owner	Site Info
									comprehensive delivery
42	1326162	112-114 High Road, Ilford	Allocated	Clementswood	Ilford	70	2		Metro Bank. Unlikely to be developed for housing in near future.
105	1326214	Woodford Avenue/Cranbrook Road North, Gants Hill	Allocated	Barkingside	Gants Hill	68	2		Parade of shops, unlikely to be developed as single scheme.
8	Not in SHLAA	If Bar 71 Ilford Hill	Allocated	Loxford	Ilford	52	1		Preapplication to demolish and use as work compound for Crossrail for 2 years
78	1326058	Car Park and Works, corner of Cedar Park Gardens and Wangey Road, Chadwell Heath	Allocated	Chadwell	Crossrail	50	2		
43	Not in SHLAA	Between Mansfield House & 2 Mansfield Road, Ilford	Allocated	Valentines	Ilford	45	2		Site allocated in 2005
20	1326009	262 – 268 High Road, Ilford	Allocated	Clementswood	Ilford	42	1		Site likely to come forward as part of town centre road realignment
221	17260021	Access Road adjacent to western Newbury Park Station Car Park	Allocated	Aldborough	Crossrail	31	2		Site largely consists of access road and cutting. Would need to be in conjunction with Sainsburys / retail park redevelopment
197	1326014	330-348 Uphall Road, Ilford	Allocated	Loxford		25	2		Site allocated in 2005