

Redbridge Local Plan Authority Monitoring Report 2017-18

March 2019

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Executive Summary

The Council has made impressive progress in a number of areas throughout the AMR monitoring period.

Most significant is the adoption of the Redbridge Local Plan (2015 – 2030) in March 2018; providing an up to date strategy for the borough that is up to date and compliant with both national and regional planning policy, which will address and manage the borough's significant planning challenges.

The Council is placing a significant emphasis on increasing overall housing supply in the borough. The borough's housing pipeline is adequate, and the Council can demonstrate a five year land supply, including the 20% buffer required by the Housing Delivery Test. 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. The Council will be delivering its own housing, both as traditional Council housing and through its own development company, Redbridge Living, to provide additional supply.

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.

The Council aim 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.

In relation to transport improvements, Crossrail has been delayed by approximately a year, with the central tunnels opening in Autumn 2019 and the full opening date now unclear. Planning permission has been granted for a 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 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.

Overall, Development Management and Enforcement performance is much improved, with an increase in the pace of determining planning applications such that all major targets are now being met.

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 such information to the implementation of the Local Development Scheme and the extent to which the borough's planning policies are being achieved.

1.1.2 The AMR is used to assess the performance and effectiveness of Redbridge's planning policies in delivering the key objectives of the Local Plan. The AMR also includes an update on the progress and implementation of the Council's Local Development Scheme (LDS), which sets the timetable for the preparation of future Local Plan documents.

1.2 What is the reporting period?

1.2.1 This AMR monitoring period covers the 2017-18 financial year from 1st April 2017 to 31st March 2018. Information beyond this date is included where it helps to provide a more complete picture of planning performance.

1.3 What is being monitored?

1.3.1 The 2017-18 AMR assesses the performance of Redbridge's adopted planning policies. These were originally as set out in the Council's adopted Local Development Framework, in particular the Core Strategy (2008) and Borough Wide Planning Policies (2008), which was replaced in March 2018 by the Local Plan. Some benchmarks had however been superseded by revisions to the London Plan prior to the adoption of the Local Plan.

1.3.2 There are five aspects of planning monitored in the AMR. Firstly, the AMR sets out the progress which is being made to implement the Council's emerging Local Plan (2015 – 2030) and other planning documents which will replace the existing Local Development Framework once it is formally adopted. Secondly, progress of key regeneration projects in the borough over the monitoring period. Thirdly, in order to ensure that the planning objectives and targets of the Council's existing Local Development Framework are being delivered, the Council monitors the effectiveness of the planning policies within it. The AMR sets out the Council's current performance to date against a range of indicators, highlighting where it is achieving targets and where it needs to improve in the future. Fourthly, the AMR monitors 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. Fifthly, the AMR summarises both the Development Management and Enforcement teams performance with regards to meeting targets for the handling of planning applications, appeals and enforcement decisions.

1.3.3 The AMR uses the most relevant and timely information available to the Council at the time of report preparation, including outcomes from non-planning services which contribute to delivering planning objectives.

1.3.4 It is important to note that the AMR does not attempt to measure and monitor each individual planning policy, but focuses on monitoring key indicators for which data is currently available, in order to assess overall outcomes in plan delivery.

1.4 Structure

1.4.1 The AMR presents information across six separate sections:

1.4.2 Section 2 monitors the milestones in the Council's LDS. This section monitors the progress of the Council's Local Plan (2015 – 2030) and other planning documents;

1.4.3 Section 3 monitors the progress of key regeneration projects in the borough which have either been completed or are ongoing over the monitoring period. This includes how the Council has sought to meet the Duty to Cooperate;

1.4.4 Section 4 monitors the effectiveness of the planning policies within the existing LDF to ensure that it is contributing towards broader planning objectives.

1.4.5 Section 5 monitors 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.

1.4.6 Section 6 monitors sets out key performance indicators for both the Council's Development Management and Enforcement teams with regards to meeting targets for the handling of planning applications, appeals and enforcement decisions.

2 Plan Making 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 a number of planning challenges which include an increasing population, a growing housing need, a challenging minimum housing target as well as providing 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), setting out a timetable of the Development Plan Documents they propose to prepare.

2.2.2 The Council's current LDS (2017-2020), came into effect in February 2017. It provides a timescale for the production of planning policy documents including the emerging Redbridge Local Plan (2015 – 2030) and Supplementary Planning Documents (SPDs). The progress of each is discussed below:

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 that have been proposed or enacted during 2017-18.

2.3.2 At a national level, the new National Planning Policy Framework was published in draft format in March 2018, and a final version published in July 2018.

2.3.3 Key changes introduced within the new NPPF (often referred to as NPPF2 or NPPF 2018) include a new centrality to design policies; the expectation that viability is front-loaded at the plan-making stage with viability assessments being an exception; a new standard methodology on 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, this introduced a new Housing Delivery Test (HDT) which introduces 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 whilst continuing to apply the principles of the "compact city" model, with a significant focus on accommodating London's housing need almost entirely within its own administrative boundaries without releasing any Green Belt and whilst increasing green cover. The increase in the rate of housing delivery from

existing levels would be through the intensification and redevelopment of small brownfield sites, especially in outer London. The Examination in Public runs from January to May 2019, with adoption of the final plan expected in November 2019.

2.4 Redbridge's Local Plan

2.4.1 In the 2017/18 monitoring period, the Council adopted the new Local Plan (2015-2030). This is the culmination of a process that started in 2011 and ensures that one of the fastest growing local authorities in the country can manage its development on an ongoing basis.

2.4.2 Earlier stages of consultation occurred in 2013, 2014, and 2016 under "Regulation 18" and "Regulation 19" of the Town and Country Planning (Local Planning) Regulations 2012. These generated significant levels of public engagement with thousands of separate comments during each consultation.

2.4.3 The Redbridge Local Plan documents and supporting evidence were submitted to the Secretary of State on 3rd March 2017 for an independent Examination in Public (EiP) by a planning inspector. The EiP hearing sessions were held across ten days between 6th June and 21st July 2017.

2.4.4 Following the hearing sessions, the Council prepared a schedule of Main Modifications required to make the Plan 'sound'. The Main Modifications to the Redbridge Local Plan were then consulted on between 6th October and 27th November 2017. A total of 35 different individuals and groups responded to this consultation.

2.4.5 Following this consultation, the planning inspector issued a Final Report into the Redbridge Local Plan examination. The Inspector's report was received in January 2018 and found the Local Plan (as modified) 'sound'.

2.4.6 The Local Plan was adopted at a meeting of the Full Council on 15th March 2018. This replaced 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 Other Plan Preparation

2.5.1 In addition to the Redbridge Local Plan, the LDS 2017-2020 provides a schedule for the preparation of the following individual planning guidance, a summary of progress is provided for each document.

Review of Redbridge CIL Charging Schedule

2.5.2 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, other local authorities typically have different charging rates for different uses and locations; and the charges are presently being reviewed in light of the new infrastructure requirements identified in the Infrastructure Delivery Plan. In accordance with the LDS a new Preliminary Draft Charging Schedule was consulted on in Winter 2018.

This will be followed by a Draft Charging Schedule and submission to the Secretary of State, with an expected late 2019 adoption date.

Planning Obligations SPD

2.5.3 The Council is presently preparing a new Planning Obligations SPD. This document will update the currently adopted 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 a local level in the emerging Redbridge Local Plan (2015 – 2030). It will provide 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.

2.5.4 In accordance with the LDS a draft SPD will be consulted on in early 2019.

Housing Design Guide SPD

2.5.5 The Council is presently preparing a new Housing Design Guide SPD. This will update the existing Householder Design Guide SPD (2012) document to reflect more recent guidance and to be in line with the emerging Local Plan (2015 – 2030). In accordance with the LDS the Council consulted on a draft SPD in early 2019.

Conservation Area Appraisals

2.5.6 The LDS identifies a need to produce new or revised Conservation Area Appraisals for each of the 16 Conservation Areas within the borough. At present there has been progress on four of these appraisals, namely Little Heath, Bungalow Estate, South Woodford, and Woodford Broadway.

2.5.7 A revised appraisal for the Bungalow Estate was adopted in July 2018, along with a new Article 4 Direction that consolidates and updates the existing additional planning controls that exist in relation to householder works.

2.5.8 The Little Heath Conservation Area Appraisal and Management Plan was adopted in July 2018. This provides a summary of the area of Little Heath and its historical significance, its positive and negative contributory features, and guidance as to its future management.

Small HMO Article 4 Direction

2.5.9 In December 2018 the Council made a non-immediate borough-wide Article 4 Direction restricting 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 will come into effect when confirmed in December 2019.

2.5.10 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.

2.5.11 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.

2.5.12 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.

2.6 Neighbourhood Planning

2.6.1 The Council has a duty to facilitate Neighbourhood Planning, which was introduced under the Localism Act in 2011. It is a community-led process which enables the community to help shape development in their area. Neighbourhood Plans, once 'made' and approved at a referendum, will form part of Redbridge's statutory development plan and can be used in the determination of planning applications.

2.6.2 At present there are no designated neighbourhood forums or areas within the borough. However, interest has been expressed from residents in South Woodford regarding the designation of a neighbourhood forum and area. The Council will provide support and advice to any group which expresses an interest in Neighbourhood Planning.

2.7 Self-build and Custom Housebuilding Register

2.7.1 The Self-build and Custom Housebuilding Act 2015 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 in order for those individuals and associations to build or commission their own homes. The Register was launched on 1st April 2016, and as of July 2018 there are a total of 29 individuals and one association who have registered an interest.

2.8 Duty to Cooperate

2.8.1 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 an integral part of the preparation of planning policy.

2.8.2 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".

2.8.3 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.

2.8.4 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>

2.8.5 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 Regeneration Projects Update

3.1 Background

3.1.1 A key ambition of the Council is to manage the borough's growth and facilitate regeneration, particularly in Ilford. In order to deliver this, the Council undertake and seek grant funding for a range of projects and initiatives to encourage investment and improvements in the borough. The following projects are highlighted which will contribute to the regeneration of the borough and the Council's housing delivery strategy.

3.2 Regeneration Strategy

3.2.1 The Regeneration Strategy (2017-2027) was approved by Cabinet in December 2017. This document sets out the Council's regeneration ambitions for the borough over the next 10 years and forms a key plank of its Corporate programme over that period. The Strategy acknowledges that regeneration is the key driver for growth in the borough, and that the Council must take a leading, interventionist role in this growth to secure the maximum benefit for local people and businesses. The five themes of the Strategy, which will shape regeneration activities, are:

- Transforming our town centres;
- Creating the right environment for enterprise;
- Building new homes for all;
- Ensuring everyone shares in our prosperity; and
- Enabling high quality spaces and places.

3.2.2 These priorities directly link to the spatial priorities set out in the Local Plan (2015 – 2030).

3.3 Ilford Manifesto and Prospectus

3.3.1 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.

3.3.2 This was followed by the Ilford Prospectus which illustrated, through a series of 'placemaking' propositions, how Ilford can be developed in accordance with the emerging Local Plan (2015 – 2030). The Prospectus seeks to support the delivery of up to 2,000 new jobs and 6,000 new homes. Key elements include:

- Exploring opportunities to strengthen retail, housing, leisure and community spaces within the town centre;
- Providing the right space to support Ilford's entrepreneurial businesses with flexible business spaces;
- Turning the town centre's highways into streets, helping unlock additional land parcels for development through road realignment, whilst reducing the impact of

cars and stitching the town centre back into its surrounding neighbourhoods with new and enhanced pedestrian connections;

- Introducing new uses to the town centre including schools, health facilities and an evening economy to support a growing residential population;
- Strengthening Ilford's cultural and civic core by developing a new cultural quarter around the Town Hall;
- Celebrating and enhancing the historic fabric and character that helps to make the town centre unique; and
- Revealing the nearby River Roding by exploring opportunities to provide pedestrian routes along the riverside.

3.4 Ilford Opportunity Area and Housing Zone

3.4.1 The London Plan (2016) designates Ilford as an Opportunity Area. To further facilitate and accelerate housing delivery, Ilford was also designated a Housing Zone by the Mayor of London.

3.4.2 The Housing Zone will provide additional funding to accelerate the delivery of at least 2,189 homes (including 553 affordable homes) in Ilford. To date Housing Zone funding has accelerated the delivery of 620 homes with planning permission.

3.4.3 Housing schemes which have utilised Housing Zone funding include Britannia Music (354 new homes) due for completion in 2020, Paragon Heights (141 new homes) due for completion in January 2019 and Horizon (122 new homes), completed in August 2018.

3.4.4 Ilford is changing and responding to the anticipated growth of the town centre. The Ilford Housing Zone bid included a funding request to deliver a new southern station entrance on Ilford Hill, to be a third entrance to support Ilford Crossrail station with increasing passenger numbers. This will compliment a newly rebuilt and fully accessible main station entrance. In order to facilitate the delivery of housing sites, particularly in the Ilford Hill area, the Council is working closely with land owners and TfL to deliver this project. Works are proposed to start on site in January 2019 and completion in the summer of 2019.

3.5 Ilford Public Realm Improvements and The Spark - Good Growth Fund

3.5.1 Alongside reviewing the use of its own asset base and encouraging and facilitating private sector investment in the town, the Council is also seeking to undertake a series of "quick win" projects to support the change in perceptions of Ilford and build on the momentum being created by Crossrail.

3.5.2 Phase 1 of the Ilford public realm improvements is due for completion by December 2018. These works include repaving sections of Ilford High Road and Chadwick Road, the provision of new street furniture, light columns and CCTV. Public consultation is taking place to seek views and opinions of Phase 1 improvement works to the street scene. There

is an online survey on Redbridge's website under 'Have Your Say' for Phase 1 feedback and will be available until 23rd November 2019. The responses from the consultation will inform any changes to be made to concept designs for Phase 2. Phase 2 is due to commence in summer 2018, subject to Cabinet approval.

3.5.3 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.

3.5.4 The project will see the Town Hall refurbished to provide a range of artists' studios, maker spaces and more traditional offices. This was granted planning permission in January 2019 (planning reference 4520/18).

3.5.5 The empty storage space on Janice Mews will be transformed into modern flexible business start-up space and a pop-up food market will be created within in the Town Hall Car Park. Planning applications have been submitted for these projects, which are expected to be delivered in 2019.

4 Policy Performance Outcomes

4.1 Background

4.1.1 This section of the AMR discusses key plan and policy performance outcomes across a range of policy areas including housing, employment, town centres, environmental sustainability, transport and infrastructure.

4.2 Housing Development

4.2.1 The Government has long had ambitious growth targets for new housing in the Thames Gateway area and in the London-Stansted-Cambridge Growth Corridor, and housing has become a more pressing political priority with a current objective of building 300,000 homes a year across England by the mid 2020s, with a significant proportion of this need being within London.

4.2.2 The London Plan wishes to focus new housing and regeneration efforts in East London which Redbridge forms a part. The Council aim to increase the number of quality homes built in the borough. The London Plan assesses housing need across London and allocates a capacity based target to boroughs, based on land that is available or is expected to be redeveloped. London Plan (2016) policy 3.3 sets a target to deliver a minimum of 11,232 homes from 2015 to 2025 in the borough.

4.2.3 This equates to the provision of a minimum of 1,123 net homes per year. This annual figure has been included within the Local Plan within Objective 1 of the Strategic Objectives; however the Local Plan seeks to deliver this annual figure over a 15 year period (2015 to 2030).

4.2.4 To provide a balanced approach to change, the Council aims to channel most new development into the hierarchy of town centres, with Ilford Metropolitan Centre, District Centres, and the Crossrail Corridor accommodating the bulk of the growth. The rest of the borough is also proposed to accommodate additional housing development, particularly on vacant, disused or underutilised sites.

4.2.5 Specific housing sites are identified in Appendix 1 of the Local Plan with indicative capacities and site specific considerations and requirements. Additional “windfall” housing sites and small sites provide additional housing capacity.

Housing Need

4.2.6 The Council has worked jointly with the four neighbouring London Boroughs of Havering, Barking and Dagenham, Newham and Waltham Forest in the production of the Outer North East London Strategic Housing Market Assessment (SHMA) 2016, to assess the overall housing need for the north east London housing market. The Redbridge specific figures were updated in 2017 for the Local Plan (2015 – 2030) evidence base. The SHMA Update estimated that the borough’s full objectively assessed housing need is 34,296 net

additional homes between 2015 and 2030. This equates to an average of 2,287 homes per year. This is over double the Council's minimum housing target of 1,123 homes per year.

4.2.7 The NPPF in paragraph 47 states that local planning authorities should “ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework”. In addition, the London Plan (2016) policy 3.3 states that boroughs “should seek to meet and exceed minimum borough annual average housing targets” and augment “with extra housing capacity to close the gap between identified housing need and supply in line with the requirement of the NPPF”. Addressing the significant housing need in the borough is a key objective of the emerging Local Plan (2015 – 2030).

4.2.8 The London SHMA 2017, prepared for the Draft London Plan (2017) assesses a “global” housing need across London of 65,878 per annum from 2016 to 2041. Doubts have been expressed regarding the size mixture indicated within this document, and the extended timespan over which it is proposed to clear the housing “backlog”, which has increased to 25 years. However, this document does not attempt to quantify need on a sub-regional or borough basis, because the London Plan completions targets effectively redistribute this need to the areas with development capacity.

4.2.9 Meanwhile, the Government has produced a new “standard method” of assessing housing need. This uses household growth projections combined with an adjustment for the affordability ratio (ration of house prices to earnings). This “standard method” gives an uncapped housing need figure of 2,981 per annum for Redbridge; however this figure is “capped” at a 40% increase on any strategic housing policy adopted in the past five years (in the case of Redbridge this would be 1,572 per annum). The government has recently (December 2018) consulted on revising the standard method.

4.2.10 None of these housing need figures automatically translate into housing targets, as the requirement for additional housing must be balanced against land availability and other policy considerations including the environment, infrastructure capacity, and heritage. Underdelivery will, however, result in increased crowding and homelessness, and an increased demand on public services, without the increases in Council Tax and planning gain from new developments.

Housing Completions

4.2.11 Policy 3.3 in the London Plan (2015) sets a target to deliver a minimum of 1,123 new homes in Redbridge each year, superseding the previous Core Strategy target of 760 per annum; this higher target was incorporated within the Local Plan (2015-2030). As demonstrated by Indicator 1 below, in the last five years the Council has delivered 1,792 homes of the minimum 3,369, which is approximately half of the cumulative target.

Indicator 1 - Net Additional Dwellings over the previous three years (2015-18)

LDF Objective / Indicator Policy	Indicator	Target	Performance
S07	Net additional dwellings completed over the previous three-year period (2015 – 2018)	3,369	1,792

4.2.7 As it can be seen from Indicator 2 in the last financial year, there was a total delivery of 462 new homes, against the housing target of 1,123 new homes. This equates to 41.1% of the annual target.

Indicator 2 - Net additional dwellings in last financial year (2017/18)

LDF Objective / Indicator Policy	Indicator	Target	Performance
S07	Net additional dwellings for the current year (2017/18)	1,123 per year	462

4.2.8 There has been an overall improvement in delivery during recent years although this slackened in 2017/18. As Table 4.1 shows, in 2014/15, 258 homes were delivered, which increased to 685 homes in 2015/16, which further increased to 818 homes in 2016/17, before a reduction to 462 homes in 2017/18. Whilst this is below target, it is expected that delivery will increase in 2018/19 and 2019/20, based upon the expected completion dates of major projects currently under construction.

Table 4.1 - Conventional Housing Completions (from start of plan period)

Completions by year	2015/16	2016/17	2017/18
Completions (net)	685	818	462
Cumulative Completions	685	1,503	1,965
Cumulative Target	1,123	2,246	3,369
Performance Against Target	-	-	-
Cumulative completions as percentage of cumulative target (from 2015/16)	61%	67%	58%

Housing Approvals

4.2.9 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.

Indicator 3 - Number of New Homes Approved in 2017/18

LDF Objective / Policy	Indicator	Target	Performance
S07	Net additional dwellings approved (2017/18)	1,123 (completions target) plus buffer for lapsed or unimplemented schemes	1,025

Table 4.2 - Net additional dwellings approved in past 3 years (2015-2018)

Year	Net Number of homes approved
2015/16	865
2016/17	1,247
2017/18	1,025

4.2.10 As Table 4.2 demonstrates, a total of 1,025 net new homes were approved in 2017/18. Over half of this total is contained within one application (4499/15) to redevelop the Sainsbury's supermarket in Ilford, with a total of 683 homes in addition to an enlarged supermarket.

4.2.11 The number of homes approved is less than the annual completions target. Whilst there is an adequate pipeline of approved schemes; given the typical time taken between an approval and a completion, as well as the proportion of consented schemes which lapse,

future increases in housing targets (or indeed delivery) mean this pipeline will “dry up” without more approvals; which will be discussed in the following section on the Housing Trajectory (paragraphs 4.2.19 to 4.2.28).

Next Steps

4.2.12 Addressing this under delivery of housing is vitally important. Whilst the adoption of the Local Plan (2015-2030), the arrival of Crossrail and the implementation of the range of regeneration projects highlighted in Section 3 is expected to accelerate housing delivery, the Council is undertaking additional steps to try and significantly increase supply. This includes:

- Participation in a Planning Advisory Service pilot programme for the Housing Delivery Test
- Implementation of the Council’s recently adopted Housing Strategy (2017 – 2022);
- Proactive engagement with the GLA, landowners, and developers, including master-planning and site assembly;
- Successfully applying for £20 million of GLA grant funding for the direct provision of affordable housing;
- Direct delivery of its own schemes through its HRA Programme (350 units from 2017-2022); and
- Recruiting a manager and staff for a new wholly owned development company, “Redbridge Living” to build new housing in the borough. This will be a private company wholly owned by the council, that will deliver market and affordable housing.

Affordable Housing

4.2.13 Local Plan Policy LP3 Affordable Housing states that the borough will set a minimum strategic affordable housing target of 35%, along with a requirement for 35% affordable housing on individual planning applications on sites with a capacity 10 homes or more. This accords with the threshold approach taken by the Mayor of London.

4.2.14 However, most applications were decided using the previous Core Strategy, that had a 50% strategic target and similar 50% requirement on sites of 10 units or more.

Indicator 4 - Affordable housing provision in last five years

LDF Objective / Policy	Indicator	Target	Performance
S07 SP8: Affordable Housing	Affordable housing completions over the past five years	50%	15%

4.2.15 As it can be seen from Indicator 4, in the last five years, the total percentage of affordable homes completed in the borough is 15% of all completions. As Table 4.3

demonstrates, this equates to the provision of 339 affordable homes. Over the past five years, the number of affordable homes delivered annually has increased, from 2 in 2013/14 to 122 in 2017/18.

4.2.16 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.

Table 4.3 - Affordable Housing Delivery 2012-18

Year	Number of Homes Built (Net)	Net Number of Affordable Homes	% Affordable Homes
13/14	266	2	1%
14/15	172	18	10%
15/16	520	98	19%
16/17	810	99	12%
17/18	462	122	26%
Total	2,230	339	15%

4.2.17 Whilst it is recognised that affordable housing completions have been below the strategic target, a number of factors have contributed to these low completions figures. This includes a significant reduction in the level of grant funding from national and regional government, meaning that the delivery of affordable housing is to a large extent reliant on cross-subsidy from market housing. In addition, a large proportion of the borough's housing development comprises of small schemes of fewer than 10 units, or larger prior approval schemes, where affordable housing contributions are not required.

Next Steps

4.2.18 In order to increase the level of affordable housing across the borough the Council is proactively working with the GLA and Registered Providers. In addition, schemes delivered through the Council's own HRA and Redbridge Living schemes will further contribute to the delivery of affordable housing. Furthermore, the Council will be implementing new Mayoral Affordable Housing and Viability SPG (2017), which sets out clear guidance to increase the level of affordable housing delivered across London.

Housing Trajectory

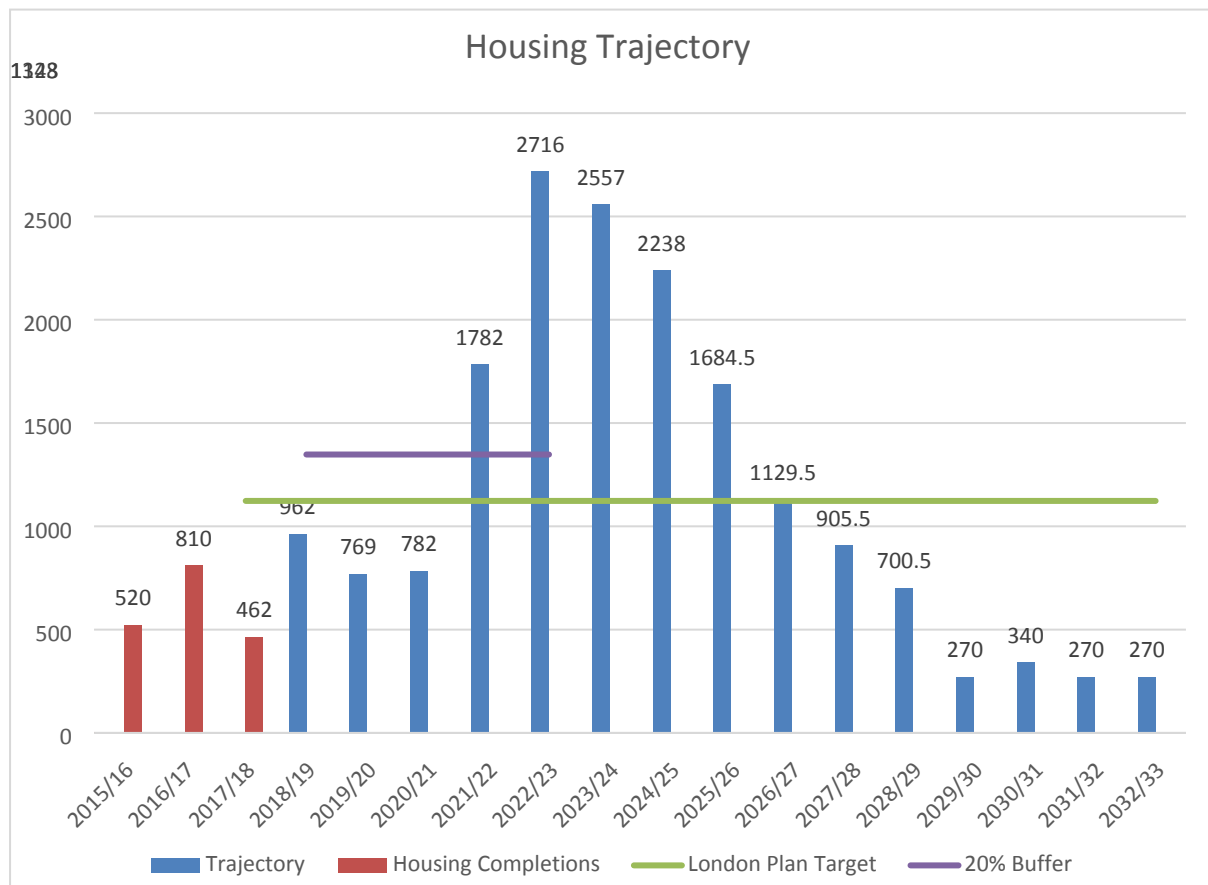
4.2.19 The housing trajectory illustrates the annual breakdown of Redbridge's deliverable housing supply for the period up to 2032/33 taking into account the annualised London Plan minimum housing target.

4.2.20 This section contains further information about the amount of housing that is likely to be delivered in the borough over the next 15 years.

4.2.21 It is important to note that the housing trajectory has been prepared with the best available information, with the majority of sites relying on the private sector for implementation. The actual output is subject to externalities including changes to national economic conditions, housing market conditions and interventions, national planning policy, development in surrounding authorities, and other factors not in the Council’s control.

4.2.22 Figure 4.1 shows the anticipated housing trajectory. The trajectory is based on the sites included in the 2013 London SHLAA but also includes additional sites identified through the development of the emerging Local Plan (2015 – 2030), and an allowance for “windfall sites” (redevelopment sites not identified within the Local Plan). The 15 year housing trajectory demonstrates that Redbridge will be able to meet and exceed its London Plan target of 1,123 homes per year from 2015 to 2030, a total of 16,845 homes over that period.

Figure 4.1 - Housing Trajectory Graph 2015 – 2033



4.2.23 Sites identified in the Council’s housing trajectory (including windfall allowances) are anticipated to yield approximately 17,237 new homes over the next 15 years.

4.2.24 Paragraph 47 of the NPPF requires the Council to identify a supply of specific deliverable sites sufficient to provide a 5 year housing supply. From 2010 to 2015, a total of 1,796 homes were built in the borough which resulted in a significant shortfall of 2,004

homes based on the Council’s previous housing target (760 homes per year) set out in the London Plan (2011).

4.2.25 Paragraph 47 of the NPPF also states that in order to make up this previous short fall, a buffer of 20% should be included in the first five years of the trajectory. In addition, the Council places no reliance on windfall as a source of housing supply in the first five years of the trajectory and focuses solely on the delivery of allocated sites.

Table 4.4 - Estimated Housing Numbers by Phase

Area Of The Borough	Phase 1	Phase 2	Phase 3	Totals
Period	2015-2020	2021-2025	2026-2030	2015-2030
Delivery from allocations	3,342	8,853	3,640	18,188
Windfall	181	822	1,350	2,700
Total delivery with windfall	3,523	10,075	4,690	18,288

4.2.26 For the five years from 2017/18 to 2021/22, the housing trajectory identifies a total of 7,011 units will be built, exceeding the 6,740 that is required to meet the five year land supply (with a 20% buffer).

4.2.27 Of these, as of 31st March 2018, there was a net pipeline of 3,087 conventional housing units; of which 1,460 had not started and 1,627 were on schemes where at least some construction had started.

4.2.28 Monitoring of the 15 year housing supply will continue on an annual basis, with actions taken to ensure adequate delivery.

Previously Developed Land

4.2.29 National, regional and LDF 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.

4.2.30 As Indicator 5 demonstrates, over the 2017/18 period, 97% of new residential development was on previously developed land, which is above the 96% target set out in the LDF. 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, but is allowed by local policy in some circumstances.

4.2.31 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.

Indicator 5 - Percentage of dwellings on previously developed land

LDF Objective / Policy	Indicator	Target	Performance
SO1 SO7	Previously Developed Land % of new and converted dwellings on previously developed land	96%	97%

Temporary Accommodation

4.2.32 The Council has a statutory duty to assist the homeless and which now extends to homelessness prevention. Homeless prevention work has been ongoing for some time, with the Council preventing almost 2,000 cases of homelessness in 2016/17.

Indicator 6 - Households in Temporary Accommodation

LDF Objective / Policy	Indicator	Target	Performance
SO4 SO7	Number of households living in temporary accommodation	Reduce number of households in temporary accommodation.	Increase of 110 households from 2016 to 2018

4.2.33 Whilst rough sleeping is the most visible form of homelessness, the vast majority of homeless households within Redbridge are within Temporary Accommodation.

4.2.34 Redbridge has a low social housing stock (both Council owned and with Registered Providers) in comparison with other boroughs. There are a total of 4,465 Council owned properties – the lowest of any borough except the City of London – against a total of 8,463 applicants on the Housing Register. 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 in hostels or B&Bs.

4.2.35 London boroughs have a significantly worse homelessness problem than the rest of England – in England excluding London, 1.30 per 1,000 households were in Temporary Accommodation (TA). In London this was 15.49 per 1,000 households, and in Redbridge this was 20.49 per 1,000 households.

4.2.36 In December 2016, there were 2,281 households in temporary accommodation. By June 2018, this had increased to 2,295, which is an increase of 14 households.

4.2.37 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.

4.2.38 The Council is participating in a pilot project for Pan London Temporary Accommodation Procurement, which will allow temporary accommodation to be sourced through a joint vehicle with other boroughs.

4.2.39 The best and most sustainable long-term solution for households in temporary accommodation is to increase the overall supply of affordable housing at social rents by the Council and Registered Providers; however, government funding priorities and continued Right to Buy losses make this challenging. This is discussed within paragraph 4.2.12.

Empty Properties

4.2.40 Empty properties represent a significant waste of resources when the borough is experiencing high housing demand. Overall the number of long term empty properties has increased slightly, whilst still remaining proportionately below the overall average for London.

Indicator 7 - Number of empty residential properties

LDF Objective / Policy	Indicator	Target	Performance
SO1	Number of residential properties empty for six months	Year on year reduction	Increase from 274 in October 2016 to 462 in October 2017.

4.2.41 As Indicator 7 sets out, the Council has seen an increase in the number of long term vacancy rates (defined as empty for more than six months); however 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 4.5 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. Approximately 130 new build properties were occupied following input from Council services.

4.2.42 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).

Table 4.5 - Empty properties returned to use through Council action

Year	2014/15	2015/16	2016/17	2017/18
Empty Properties returned to use	71	109	107	71

4.2.43 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 provided in the 2017/18 financial

year and the Council is reviewing the use of the empty property grant as part of a revised Private Sector Housing Strategy.

Gypsies and Travellers

4.2.44 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.

Indicator 8 - Number of Gypsy and Traveller pitches

LDF Objective / Policy	Indicator	Target	Performance
SO7	Number of Gypsy and Traveller pitches	Maintain the number of Gypsy and Traveller pitches	No change in number of pitches (16)

4.2.45 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. This has a total of 16 pitches.

4.2.46 The Council produced a Gypsy and Traveller Accommodation Assessment (2017), 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 an additional site(s) to meet the future needs of the Gypsy and Traveller community.

4.2.47 As Indicator 8 demonstrates, there has been no change in the level of gypsy and traveller provision over the monitoring period.

4.3 Town Centres and Employment Land

4.3.1 The Council wants to develop a strong local economy to create employment and provide people with the goods and services they need. The Council seeks to promote new investment in the borough’s town centres to improve their vitality and viability, and to maintain and support the borough’s established town centre hierarchy. It will direct new major retail and leisure development towards its town centres, particularly Ilford Metropolitan Centre. The Council also aims to diversify uses in town centres, to encourage more people to visit and use them.

Commercial Floorspace in Redbridge

Indicator 9 - Change in Commercial Floorspace (A1-A5 uses) 2014-17

LDF Objective / Policy	Indicator	Target	Performance
SO5	Change in floorspace by type	Total: A1-A5: increase in 6,750m ²	A1-A5 – net loss of 1,964m ²

4.3.2 When the LDF was adopted in 2008 it anticipated that there would be an annual increase in 6,750m² of new commercial floorspace in the A1-A5 use classes in the borough over the monitoring period, including 3,500m² of new retail floorspace. Subsequent to this, the Council commissioned the Retail Capacity Study (2015) to inform the Local Plan. This study found there was scope for 23,911 - 39,851 m² net sales area of comparison retail floorspace, and 8,562 – 17,071 m² net sales area of convenience retail floorspace. After converting net sales area to gross floor area, this equates to approximately 46,390m² of A1 use class retail floorspace over 15 years, or 3,100m² per year.

4.3.3 However, in line with both national and regional trends (where VOA data shows around a quarter of retail floorspace in England and Wales has been lost between 2008 and 2015¹), the data suggests that there has been a small net loss of 1,964 m² of floorspace in use classes A1 to A5, with losses in all categories, notwithstanding that the floor area of small commercial extensions are not recorded unless part of larger schemes. Table 4.6 sets out the changes in commercial floorspace.

Table 4.6 - Changes in Commercial Floorspace

Completions with changes in floorspace by Use Class	Annual Target	2014/15	2015/16	2016/17	2017/18
A1 Retail	3,500m ²	-354	-688	192	-1139
A2 Financial and Professional Services	1,250m ²	-946	0	121	-72
A3-A5 Food and Drink	2,000m ²	499	-96	183	-753
Total A1-A5	6,750m ²	-801	-784	496	-1964

Approved Commercial Floorspace

4.3.4 In terms of approvals the picture shows a notable improvement. As Table 4.7 demonstrates, there is a net increase in approved A1 floorspace; mostly relating to the

¹EXPERT COMMENT: Retail decline, in maps: England and Wales lose 43m square metres of shop space <https://www.northumbria.ac.uk/about-us/news-events/news/expert-comment-retail-decline/>

redevelopment of Sainsbury's (4499/15). Most of this net increase in A1 floorspace relates to ancillary space including underground parking, plant, and back of house that is included within the A1 use class; however, there is also a substantial increase in gross sales area of 2070m².

Table 4.7 - Town Centre Approvals by Use Class

Net Floor area (m ²) approved by 2017/18	A1 shops and retail	A2 professional services	A3 food and drink	A4 drinking establishments	A5 hot food takeaway
21,257	22,112	-397	288	-635	-111

4.3.5 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.

Retail Vacancies within the Borough's Town Centres

4.3.6 Vacancy levels are a good general indicator of the health of a town centre. Indicator 10 sets out, the current vacancy levels within the borough's town centres.

Indicator 10 - Retail vacancy Rates

LDF Objective / Policy	Indicator	Target	Performance
S01	Vacancies	Reduction in vacancy level across all town centres	Vacancies range from 11% in Ilford to 5% in District Centres to 4% in Local Centres.

4.3.7 As Table 4.8 shows, whilst there have not been any updates during the monitoring period, retail vacancies in Redbridge have generally declined in the past few years. For example, vacancies in Ilford Metropolitan Town Centre have reduced from 12% in 2011/12 to 11% in 2016/17. In the borough's District Centres there has been a reduction from 6% in 2011/12 to 5% in 2016/17. In relation to Local Centres, the low vacancy rate of 5% in 2011/12 was maintained in 2016/17.

Table 4.8 - Retail Vacancy Rates detail 2011-17

Vacancies	2011/12	2013	2014/15	2016/17
Ilford Overall	12%	Data not collected	12%	11%
District Centre Overall	6%	Data not collected	5%	5%
Local Centres	5%	5%	No data	5%

Leisure

4.3.8 The Council aspires to deliver new leisure facilities in the borough. As Indicator 11 sets out, the borough has seen an increase in the level of leisure floorspace delivered, with an increase of 1,852m² over the monitoring period. Much of this new floorspace relates to the provision of two new private gyms in the borough.

4.3.9 Subsequent to the monitoring period, a swimming pool was completed at Mayfield School; and a planning application submitted in August 2018 for a new swimming pool and leisure centre at Wanstead High School (ref 3467/18), which was approved in November 2018. These will be expected to be shown as completions in subsequent years.

Indicator 11 - Change in D2 (Leisure) Floorspace

Objective / Policy	Indicator	Target	Performance
S08	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 increase of 1,852m ² in 2017/18, 86% within town centres

Investment in the Borough's Town Centres

4.3.10 Town centre regeneration and renewal is a key Council priority. In addition to the regeneration projects described in Section 3 relating to Ilford, there has been a significant amount of refurbishment of and investment within other existing town centre units during the 2017-18 monitoring period.

Employment Land

4.3.11 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.

4.3.12 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).

4.3.13 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.

Indicator 12 - Change in B1-B8 floorspace 2017-18

LDF Objective / Policy	Indicator	Target	Performance
SO5	Change in floorspace by type (2017/18)	Total: 2,500 m ² new floorspace, B1 – B8	Loss of 8,934 m ² B1 – B8 floorspace

4.3.14 The LDF anticipated that over the monitoring period there would be an increase in the amount of new employment floorspace in the borough. However, as Indicator 12 sets out has been a net decrease of 8,934 m² of all employment floorspace. This trend is in common 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.

4.3.15 As Table 4.9 sets out, in relation to B1 (office) floorspace the Council has seen a reduction in the level of floorspace. The main reason for this decrease of 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.

4.3.16 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 2017/18 period a total of 6,638 m² of B1 floorspace was lost; however, a large amount of this loss (2,611m²) was counted only upon completion of part of the Barnardo’s Village redevelopment; and the office space in question had been re-provided earlier under a different planning permission.

4.3.17 Table 4.9 sets out a minor loss of 109 m² of B2 floorspace, from the change of use of a part B2 / B8 industrial unit to a gym.

4.3.18 In relation to B8 (storage and distribution) floorspace, as Table 4.9 sets out, there has been a decrease in 2,187 m². This is largely due to the redevelopment of lock-up garage sites, such as the loss of 1,054m² of garage floorspace at Yellowpine Way (ref 3343/15).

Table 4.9 - Employment completions by year (2015-18)

Year	B1	B2	B8	Total area (m²)
2015/16	-18,095	0	-872	-18,967
2016/17	-7,808	-13,000	-168	-20,976
2017/18	-6,638	-109	-2,187	-8,934
Total	-32,541	-13,109	-3,227	-48,877

4.3.19 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 Industrial Park and Southend Road Business Area. 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.

Work Redbridge

4.3.20 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.

In 2017/18, the Council gave impartial information, advice, and guidance to 694 people. Approximately 219 residents received support to update and review their CV and 208 people were supported into work. Additionally, 35 people started an apprenticeship, 219 were supported with CV writing, and 56 were supported with interview practice. The number of people supported is less than in 2017/18, however the service has sought to re-focus on people who require greater levels of support to enter or re-enter work, and the number of people within sustained employment is above target.

4.3.21 Work Redbridge engages with employers, including within the construction sector to ensure that residents are in a position to gain work within construction, or the wider supply chain.

4.4 Sustainability

Air Quality

4.4.1 Air Quality is an issue at the London wide and national level, and the Council is currently in the process of updating its response to air quality issues. The indicator on air quality monitors the applications that comply with Policy E8 (Air Quality) of the Borough Wide Primary Policies DPD. In addition, other LDF policies, such as Policy T1 (Sustainable Transport) have a direct positive impact on air quality.

Indicator 13 - Application of Air Quality Policy (E8) to planning applications

LDF Objective / Policy	Indicator	Target	Performance
SO2 SO4	Air Quality	Increase number of applications to comply with policy E8	Policy E8 applied specifically to increasing number of applications

4.4.2 In regard to planning applications, under policy E8 Air Quality, the Council may require mitigation where there may be a negative impact on air quality arising from a development. To achieve this it may be necessary to attach conditions to an application. As set out in Table 4.10, policy E8 was applied in the following number of planning applications over the monitoring period.

Table 4.10 - Planning Applications where Policy E8 (Air Quality) was applied

Year	Application of Policy E8
2014/15	<p>Policy E8 applied to three approvals. Two related to major applications, and one related to a full planning application.</p> <p>Policy E8 also applied to three refusals. One was a prior approval to demolish application, one was a major application, and one was a full planning application.</p>
2015/16	<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>
2016/17	<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>
2017/18	<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>

4.4.3 As shown in Table 4.10, the number of applications where Policy E8 (Air Quality) was applied is increasing, both in relation to the refusal of applications and conditions being applied.

4.4.4 In addition the Council is currently updating its Air Quality Action Plan. A Draft Air Quality Action Plan (AQAP) for 2018-2023 has been prepared and is due to be finalised, this will replace the previous action plan, which ran from 2006. The draft 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.

4.4.5 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. This will provide planting, a two-way cycle track, improved pedestrian facilities, 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.

4.4.6 The Council has also lobbied the Mayor of London to include Redbridge within an expansion of the Ultra-Low Emissions Zone (ULEZ). The Council will hear if it has been included in the coming months.

Nature Conservation and Biodiversity

4.4.7 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).

4.4.8 Following the monitoring period, 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.

4.4.9 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.

4.4.10 Such measures may include SANG (Suitable Alternative Natural Greenspace) and SAMM (Strategic Access Management and Monitoring) and will be included within the future Planning Obligations SPD.

4.4.11 Information from the GiGL (Greenspace in Greater London) Partnership provides detailed monitoring of biodiversity and green space in London. Overall performance has remained broadly stable.

Indicator 14 - Number of Species recorded in borough

LDF Objective / Policy	Indicator	Target	Performance
SO2	All species recorded in the borough Designated Species London Invasive Species Absent species record	Maintain or improve performance	Maintained

4.4.12 As Indicator 14 and Table 4.11 demonstrate, the Council has largely maintained the level of biodiversity in the borough over the monitoring period. Whilst all species in the borough has been maintained, Designated Species has seen a small reduction, with a small increase in London Invasive Species.

Table 4.11 - Biodiversity in Redbridge

Year	2012/13	2016/17
All species recorded in the borough	3,376	3,376
Designated species	379	367
London Invasive species	27	30
Absent species record	704	-

Green Belt, MOL and Open Space

4.4.13 Redbridge has a good amount of open space compared to other London boroughs. Currently 2,000 ha, or approximately 30% of the borough, is designated as Green Belt and Metropolitan Open Land (MOL). In addition to the Green Belt and environmental designations, there are a further 170ha of open spaces in the borough. Therefore, including Green Belt, over 40% of the borough is open space, including publicly accessible spaces, private land, agricultural land, woodland, playing fields, parks, play areas, allotments and cemeteries; but not including private domestic gardens.

4.4.14 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.

4.4.15 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.

4.4.16 The Redbridge Open Space Assessment (2017) has been 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 4.12.

Table 4.12 - 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
Total	46.41	23.57	17.97	8.89

4.4.17 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 will form the baseline for future monitoring.

4.4.18 The former LDF and 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.

Indicator 15 - Change in Green Belt and Open Space

LDF Objective / Policy	Indicator	Target	Performance
CR1 and SP2	Change in Green Belt, MOL and Open Space area	No net loss	1.22 hectares of open space lost in 2017/18. c. 150 hectares of Green Belt released through the Local Plan process.

4.4.19 As Indicator 15 shows, a total of 1.22 hectares of open space was lost in permissions granted in 2017/18.

4.4.20 This consists of 0.1 hectares (comprised mostly of tennis courts) lost for the construction of new sports facilities at Barking Abbey Comprehensive School Playing Fields in Loxford (4186/17); and 1.12 hectares lost for the construction of the Atam Academy adjacent to Redbridge College, Little Heath (4984/16).

4.4.21 Approximately 150 hectares of land was released from the Green Belt through the Local Plan process. This consists mostly of land at Billet Road and King George and Goodmayes Hospitals, in addition to land near Roding Hospital and previously developed land at Repton Park. There were also some minor boundary changes elsewhere to align the Green Belt boundary with physical features.

Green Flag Award Scheme

4.4.22 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.

4.4.23 In 2013, the Council had six parks which achieved this standard. However, as Indicator 16 sets out, over the monitoring period the number has increased to nine.

Indicator 16 - Green Flag Parks in the Borough

LDF Objective / Policy	Indicator	Target	Performance
S08 Policy CR1	Number of Parks maintained to Green Flag Standard	Maintain the 6 Parks at Green Flag standard	Improved – There are now 9 Green Flag standard parks.

4.4.24 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.

Allotments

4.4.25 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.

4.4.26 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.

Flood Risk

4.4.27 Policy E5 (Flooding and Water Quality) states that proposals for development will be refused where they increase flood risk or conflict with the sequential approach to flood risk within a Strategic Flood Risk Assessment. Development proposals in areas at risk of flooding must be accompanied by a Flood Risk Assessment.

Indicator 17 - Planning Applications granted contrary to Environment Agency advice

Objective / Policy	Indicator	Target	Performance
SO2 Policy SP2	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 prior to advice.

4.4.28 As Indicator 17 and Table 4.13 demonstrate, the Council has not approved a planning application contrary to the advice of the Environment Agency over the monitoring period.

Table 4.13 - Number of planning permissions consulted on with the Environment Agency 2014-18

Year	Number of planning permissions consulted on with the Environment Agency
2014/15	Total of 48 applications approved with EA consultation.
2015/16	Total of 78 applications approved with EA consultation. 8 Prior approval applications approved.
2016/17	Total of 73 applications approved with EA consultation. 4 Prior approval applications approved.
2017/18	Total of 17 applications approved with EA consultation. One Prior approval application approved.

4.5 Conservation and Urban Design

4.5.1 The borough's planning policies seek to ensure the positive management of different areas of the borough, both in respect of existing areas, as well as new development.

National and Local Conservation Listings

4.5.2 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.

4.5.3 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.

Indicator 18 - Heritage Assets at Risk

Objective / Policy	Indicator	Target	Performance
S03	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 as of November 2018.

4.5.4 As Indicator 18 demonstrates, the number of historic assets which are at risk has been maintained under the target. 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.

4.5.5 The Register contains a total of nine assets in Redbridge as of November 2018 – consisting of three Conservation Areas (one also a Registered Park and Garden), and five Listed Buildings. Table 4.14 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 4.14 - Heritage at Risk assets in Redbridge

Heritage Asset	Type	Condition	Actions Undertaken / Planned
Bungalow Estate	Conservation Area	Very bad	Character Appraisal and Management Plan adopted 2014. Design Guide adopted and replacement Article 4 direction made.
Wanstead Park	Conservation Area and Registered Park and Garden Grade II* [counted twice in Register]	Very bad / Extensive significant problems	Parkland plan drafted (2011), funding to enable delivery being explored by City of London.
Woodford Bridge, Bridge	Conservation Area	Very bad	Character Appraisal and Management Plan adopted 2014. Public realm improvements delivered on site (funded through TfL Local Implementation Plan).
Church of St Mary, Overton Drive, Wanstead E11 - Redbridge	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.
Garden Temple in garden of Temple House, 14, The Avenue, Wanstead E11	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.
The Grotto, Wanstead Park	Listed Building Grade II	Poor	Survey commissioned by City of London in 2017; works identified now being carried out.
Dr Johnson public house, Longwood Gardens, Ilford	Listed Building Grade II	Poor	Urgent Works Notice Served May 2017, substantial progress made since, Planning Permission and Listed Building Consent for conversion to retail store and flats granted November 2017; discharge of conditions applications granted August 2018. Construction works have commenced.
831, High Road, Ilford	Listed Building Grade II	Poor	Listed Building Consent (application 5340/16) refused late 2017.
6-8, High Street, Wanstead, E11	Listed Building Grade II	Very bad	Planning Permission and Listed Building Consent granted on 14 th April 2015, works to restore and extend property for residential use recently completed.

4.5.6 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 19 - Number of Heritage Assets

Objective / Policy	Indicator	Target	Performance
S07	Number of the following:	Maintain or increase the number of entries in each heritage asset type.	
	Statutory Listed Buildings by English Heritage.		138 (increase)
	Statutory Listed Parks/ Gardens by English Heritage.		2 (no change)
	Designated Conservation Areas by LBR.		16 (no change)

4.5.7 As Indicator 19 shows, there has been no change in the number of Statutory Listed Parks/Gardens, designated Conservation Areas or Locally Listed Buildings over the monitoring period. The number of Statutory Listed buildings in the borough remains unaltered at 138.

Conservation Areas

4.5.8 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.

Indicator 20 - Number of Conservation Areas with up to date Character Appraisals

Objective / Policy	Indicator	Target	Performance
S03	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) Little Heath (Adopted 2018)

4.5.9 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 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.

4.5.10 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.

Household Design

4.5.11 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.

Indicator 21 - Use of Householder Design SPD

Objective / Policy	Indicator	Target	Performance
S03	Use of Householder Design Guide SPD	Number of applications refused using the principles set out in the SPD	Increase from 94 to 97 applications per year refused using SPD

4.5.12 To ensure that extensions and alterations to houses are appropriate the Council has prepared the Householder Design Guide Supplementary Planning Document (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.

4.5.13 Indicator 21 and Table 4.15 demonstrate that the Council has increasingly refused planning applications for alterations and extensions using the Household Design Guide. This demonstrates that the Council is only supporting good quality design which protects the amenity of immediate occupiers.

4.5.14 The Council is preparing a new Housing Design SPD that will provide updated guidance to support the new Local Plan (see paragraph 2.5.5).

Table 4.15 - Number of Applications refused under the Householder Design Guide SPD

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

4.6 Infrastructure Funding and Delivery

Infrastructure Delivery Plan

4.6.1 The delivery of infrastructure required to support the borough’s needs and future growth is contained within the Infrastructure Delivery Plan (IDP).

4.6.2 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.

Health

4.6.3 Increases in population mean that provision of new and expanded healthcare and medical facilities are important in meeting the healthcare needs of Redbridge.

4.6.4 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.

4.6.5 No significant new floorspace for medical or healthcare facilities has been completed within the 2017-18 monitoring period.

Education and Community

4.6.6 The Local Plan includes ambitious targets for the delivery of new schools and community facilities.

Indicator 22 - Delivery of D1 floorspace in Redbridge

LDF Objective / Policy	Indicator	Target	Performance
S07 Strategic Policy 10: Community Facilities	Use Class D1 (Non Residential Institutions) Amount of floorspace completed.	Net increase	Net increase of 719 m ² in 2017-18 period

4.6.7 There was a modest increase in floorspace within Use Class D1; this follows a far greater increase in previous years under a school expansion programme.

4.6.8 New schools, school expansions, and Further Education completions are shown in Table 4.16.

Table 4.16 – Developments with D1 floorspace completed during 2017-18

Planning reference number	Name	Type of institution	Description	Floor area	Capacity ²
1675/15	South Park Primary School	Primary School	New block with 4 classrooms, new nursery block	496m ²	90 pupils + 26 nursery
2715/13	Barnardo's Phase 4/5	Day nursery	Conversion of cottage into day nursery as part of residential development	223m ²	41 children

4.6.9 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.

4.7 Waste and Recycling

4.7.1 Redbridge is committed to the sustainable management of waste, in line with national and regional policy, through prioritising waste reduction, re-use and recycling.

4.7.2 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.

² FE = Forms of Entry. As a measure of student capacity, 1FE is equal to 30 students in each year group within the school.

4.7.3 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.

4.7.4 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.

4.7.5 The Council monitors the throughput of identified Recycling Facilities in the borough at its recycling centres in Chigwell Road and Ilford. The most recent available data shows that the recycling rate is 28% in 2015/16, a slight decline from the last two monitoring years down from 29% in 2014/15 and 30% in 2013/14. The Council recognises the importance of improving its recycling levels and will work with the ELWA and partners to address this.

4.7.6 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.

4.7.7 To enable this, Cabinet agreed in January 2018 to bring the waste and recycling collection service in-house from the current contractor at the end of the existing contract in August 2019. The future of the waste collection service will also inform discussions with ELWA about the change in the disposal service. Ultimately the implementation of a new waste and recycling collection arrangement will entail a major operational and cultural change for the Council and therefore, contribute to overall improvements in recycling levels and service delivery.

4.8 Minerals

4.8.1 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.

Indicator 23 - Sand and Gravel Extraction per annum

LDF Objective / Policy	Indicator	Target	Performance
S05	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.

4.8.2 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.

Indicator 24 - Total remaining minerals supply

Objective / Policy	Indicator	Target	Performance
S05	Total proven remaining Minerals supply	Sufficient to allow 100,000 tonnes annual extraction	c. 1,000,000 tonnes proven reserves

4.8.3 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.

4.8.4 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.

4.8.5 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. This is achievable, 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 24 demonstrates.

4.8.6 Indicator 23 shows, during the 2017-18 monitoring period, there was no ongoing extraction. 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.

4.9 Transport

4.9.1 In relation to transport improvements, Redbridge will benefit hugely from Crossrail. Class 345 trains entered service in June 2017, however the opening of the central tunnels from Paddington to Whitechapel has been delayed and is now not expected to open until 2020, with further delays to the full service from Shenfield to Paddington, Heathrow, and Reading.

4.9.2 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.

4.9.3 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.

4.9.4 At present, the LIP2 within each borough is in use, however TfL have released guidance on how boroughs can develop their LIP3 plans to deliver transport schemes that will help to achieve the objectives of the new draft Mayor's Transport Strategy. Redbridge has prepared a LIP3 document, which is due to be approved in March 2019.

Step Free Access

4.9.5 Planning permission has been granted for a new station entrance and ticketing hall at Ilford Station (see paragraph 3.4.4), along with an application for an additional southern entrance. In addition, significant progress has been made on step free access at six stations in the borough. 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 Community Infrastructure Levy, Section 106 and New Homes Bonus

Infrastructure funding and delivery

5.1.1 It is important that communities and new developments are appropriately supported by infrastructure, community facilities and services. The general increase in the level of housing development in the borough has resulted in an increase in monies received via CIL, S106 and the New Homes Bonus.

5.1.2 Indicator 25 shows 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.

Indicator 25 - Section 106 Agreements

LDF Objective / Policy	Indicator	Target	Performance
S09	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	Volume of Section 106 contributions received and negotiated reduced due to exceptional receipts last year

5.1.3 Section 106 agreements have historically been the primary mechanism for contributions from developers towards community infrastructure. As Indicator 25 demonstrates, the Council received an exceptional amount of money in 2016/17 and considerably less in 2017/18. Table 5.1 sets the details in terms of income and expenditure over the plan period from 2015-18.

5.1.4 It shows that in 2017/18 the Council has received a total of £68,329 via S106. Of this it has spent £7,307,989. As at 31st March 2018, the closing balance for S106 was £8,872,975. The majority of these funds are, however, committed towards specific infrastructure projects within the borough.

Table 5.1 - Section 106 Contributions

Financial year	Summary
2015/16	<p>In the year 2015/16, the Council received a total of £1,265,703 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 £4,359,926 in the same financial period.</p>
2016/17	<p>In the year 2016/17, the Council received a total of £6,909,616 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 £35,405 in the same financial period.</p>
2017/18	<p>In the year 2017/18, the Council received a total of £68,329 in S106 financial contributions.</p> <p>In the same period, the Council two S106 agreements; these did not include any new financial contributions but secured affordable housing or other measures “in kind”.</p> <p>In addition, 27 on/off site affordable housing units were also secured.</p> <p>The Council spent a total of £473,532 in the same financial period.</p>

Community Infrastructure Levy (CIL)

5.1.5 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 100m² of additional floor space.

Indicator 26 - Borough CIL

LDF Objective / Policy	Indicator	Target	Performance
SO9	<p>Borough CIL</p> <p>(a) The total Borough CIL receipts for the reported year;</p> <p>(b) The total Borough CIL expenditure for the reported year;</p> <p>(c) Summary details of Borough CIL expenditure</p>	Maintain and increase contributions made through the planning system	Borough CIL collections increased

5.1.6 CIL rates are calculated on a per square metre basis, and the Redbridge CIL is a single flat rate charge of £70 / m² (plus indexation) applied uniformly across the whole borough, with the same rate applying to all new types of development.

5.1.7 In addition to the Redbridge CIL, developers must also pay a Mayoral CIL of £35 / m² (plus indexation), which is collected by the Borough and then transferred to TfL to fund Crossrail (see paragraphs 5.1.14 - 5.1.18).

5.1.8 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".

5.1.9 As Table 5.2 states, between the period 1st April 2017 and 31st March 2018, the Council raised a total of £490,656 in CIL receipts, and issued a further £10,276,004 in CIL liabilities, which will be due to be paid once those developments commence.

5.1.10 As covered in paragraph 2.5.2, 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 Preliminary Draft Charging Schedule was consulted on from November 2018 to January 2019.

Table 5.2 - CIL income and expenditure

Financial year	Summary
2014/15	<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 £1,398,282 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 £1,580,615.</p>
2015/16	<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 £1,564,295 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 £1,564,295.</p> <p>In addition, £15,388 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in Table 5.3.</p>
2016/17	<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 £1,629,961 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 £902,000.</p> <p>In addition, £67,170 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in Table 5.4.</p>
2017/18	<p>In the year 2017/18, the Council issued 39 CIL liability notices with a potential value of £10,276,004.</p> <p>In the same period, the Council received a total of £490,656 in Redbridge CIL. £69,918 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 £0.</p> <p>In addition, £130,909 was allocated/spent towards local CIL funded projects. A full breakdown of these projects is provided in Table 5.5.</p>

5.1.11 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. A further 5% is allocated towards administrative expenses.

5.1.12 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. Table 5.3, Table 5.4 and Table 5.5 show how this money was spent in 2015/16, 2016/17 and 2017/18.

5.1.13 . A consultation is run annually to allow residents and community groups to submit applications for funding. Money not spent is rolled over into subsequent years.

Table 5.3 - 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
Total	£15,388

Table 5.4 - 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
Total	£67,170

Table 5.5 - 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)	£1,900
Total	£130,909

Mayoral CIL

5.1.14 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.

Indicator 27 - Mayoral CIL

LDF Objective / Indicator Policy	Target	Performance
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SO9	Mayoral CIL		
	(a) The total Mayoral CIL receipts collected for the reported year;	Maintain and increase contributions made through the planning system	Level of contributions increased in 2017/18
	(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		

5.1.15 As Table 5.6 states, over the past five years, the Council has collected a total of £1,346,931 in MCIL.

Table 5.6 - MCIL collected per financial year (£)

MCIL	12/13	13/14	14/15	15/16	16/17	17/18	Total (£)
Payments	£29,370	£189,257	£300,904	£450,266	£377,134	£214,136	£1,561,067

5.1.16 The present MCIL mechanism expires in 2019, and is expected to exceed its £600 million funding target, with the cumulative total collected from across London having reached £550 million as of Quarter 2 of 2018/19.

5.1.17 MCIL will be replaced by Mayoral Community Infrastructure 2 (MCIL2) from 1 April 2019. This has a more ambitious funding target of £5.4 billion and is intended to provide a proportion of funding for Crossrail 2, however the Mayor has the flexibility to spend it on any strategic transport infrastructure, and it is expected that some of this funding will be used to repay additional borrowing for Crossrail. Developments granted planning permission before this date, that commence development when MCIL2 is in operation, will continue to be charged at the earlier rate.

5.1.18 The MCIL2 Examination in Public occurred in September 2018 following an earlier Preliminary Draft Charging Schedule and Draft Charging Schedule, and the examiner's report issued in November 2018 recommended adoption of the proposed charging schedule with two minor amendments. A charge of £60/m² is proposed for Band 2 authorities, including Redbridge; with the existing health and education exemptions retained.

New Homes Bonus

5.1.19 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.

5.1.20 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.

5.1.21 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.

5.1.22 This funding can then be spent as a given local authority sees fit. As Table 5.7 sets out, since 2012 the Council has received a total of £20,221,657 in New Homes Bonus.

Table 5.7 - Cumulative payments from the New Homes Bonus

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

5.1.23 There has been a year on year increase in the level of New Homes Bonus which the Council has received. This trend correlates with the increased completions which the Council has experienced over the monitoring period.

6 Planning Performance

This chapter assesses the performance of Redbridge in terms of assessing and determining planning applications, and carrying out planning enforcement action.

6.1 Planning Applications

6.1.1 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.

6.1.2 A summary of applications is provided within Table 6.1 with percentage figures. This table shows an upward trend in the number of planning applications that the Council has validated each year. Table 6.1 shows that in 2017/18 a total of 5502 planning applications were validated, a slight reduction on the previous year.

6.1.3 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.

Table 6.1 – Applications validated by Type (Summary), 2015-18

Type of Application	2015/16	%	2016/17	%	2017/18	%
Major Applications	20	0	44	1	36	1
Minor Applications	533	10	598	10	565	10
Others	2570	48	2952	51	2863	52
Not Required	2086	42	2151	38	2038	37
Total	5209	-	5745	-	5502	-

6.2 Planning Determinations

6.2.1 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.

6.2.2 Despite a sustained high caseload (see Table 6.2), 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 89% (target 82%) of major applications and 91% (target 75%) of minor applications, along with 94% (target 84%) of other applications. These targets in turn exceed national targets for determining applications.

Table 6.2 - Determination of Applications within time

Number and percentage of applications determined within target time									
Year	2015/16			2016/17			2017/18		
Application Type	On Time	Total	%	On Time	Total	%	On Time	Total	%
Major	8	15	45	27	39	71	23	26	89
Minor	264	457	58	273	459	59	463	511	91
Others	1675	2261	74	2149	2664	81	2576	2751	94
Not Required	1853	1970	94	1854	1989	93	1630	1876	87
Total	3800	4703	80	4303	5151	83	4692	5164	91

6.2.3 The Council's target is for 85% of all applications to be approved. However, the percentage of applications approved remain above this figure. It is hoped that changes to the LPAR requirements will improve the quality of applications and increase this figure in future.

6.3 Appeals

6.3.1 One option available to applicants when the Council refuses to grant planning permission for a development is to appeal to the Secretary of State against the Council's decision. The Council has a target that no more than 30% of appeals against the Council's decisions should be allowed.

6.3.2 As Table 6.3 shows, the percentage of appeals allowed in favour of the applicant has increased in recent years. The Council was below target in 2017/18, in line with past performance. 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 the submission of a revised scheme) are often preferred.

Table 6.3 - Appeals allowed in each year

Year	2015/16	2016/17	2017/18
Percentage of Appeals Allowed	34%	38%	41%

6.3.3 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.

6.3.4 In this instance, the proportion of all decisions which are overturned at appeal is significantly below government targets, indicating that the overall quality of planning decisions is high, and that the majority of refused applications are not appealed because the applicants are advised to make changes to their proposals.

Table 6.4 - Quality of planning decisions

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

Source: MHCLG Live tables P152 and P154

6.3.5 The indicator for the quality of major applications is high by national standards, as the national average is 2.4% of all applications overturned at appeal. However, the relatively low number of major applications means this figure is prone to fluctuation.

6.4 Pre-Application Advice

6.4.1 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. Table 6.5 shows the number of pre-application enquiries per year during the monitoring period.

6.4.2 Pre-applications allow for draft layouts and designs to be submitted for comment from officers, prior to an application, allowing for a consensus to be formed on the principle of the scale and nature of development, and 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.

Table 6.5 - Number of Pre-Application Enquiries per year

Year	2015/16	2016/17	2017/18
Pre-Application Enquiries	149	206	178

6.4.3 There has been a slight decrease in the number of pre-application enquiries in 2017/18 compared with 2016/17, however there has been an increase in overall pre-application activity with an increase in strategic pre-application discussions.

6.5 Strategic Applications

6.5.1 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.

6.5.2 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.

6.5.3 A total of 2 Mayoral initial representations and 4 Mayor’s final decisions were made in relation to Strategic Applications during 2017-18. In all of the Mayor’s final decisions, he allowed the decision of Redbridge as the local authority to stand.

6.6 Enforcement

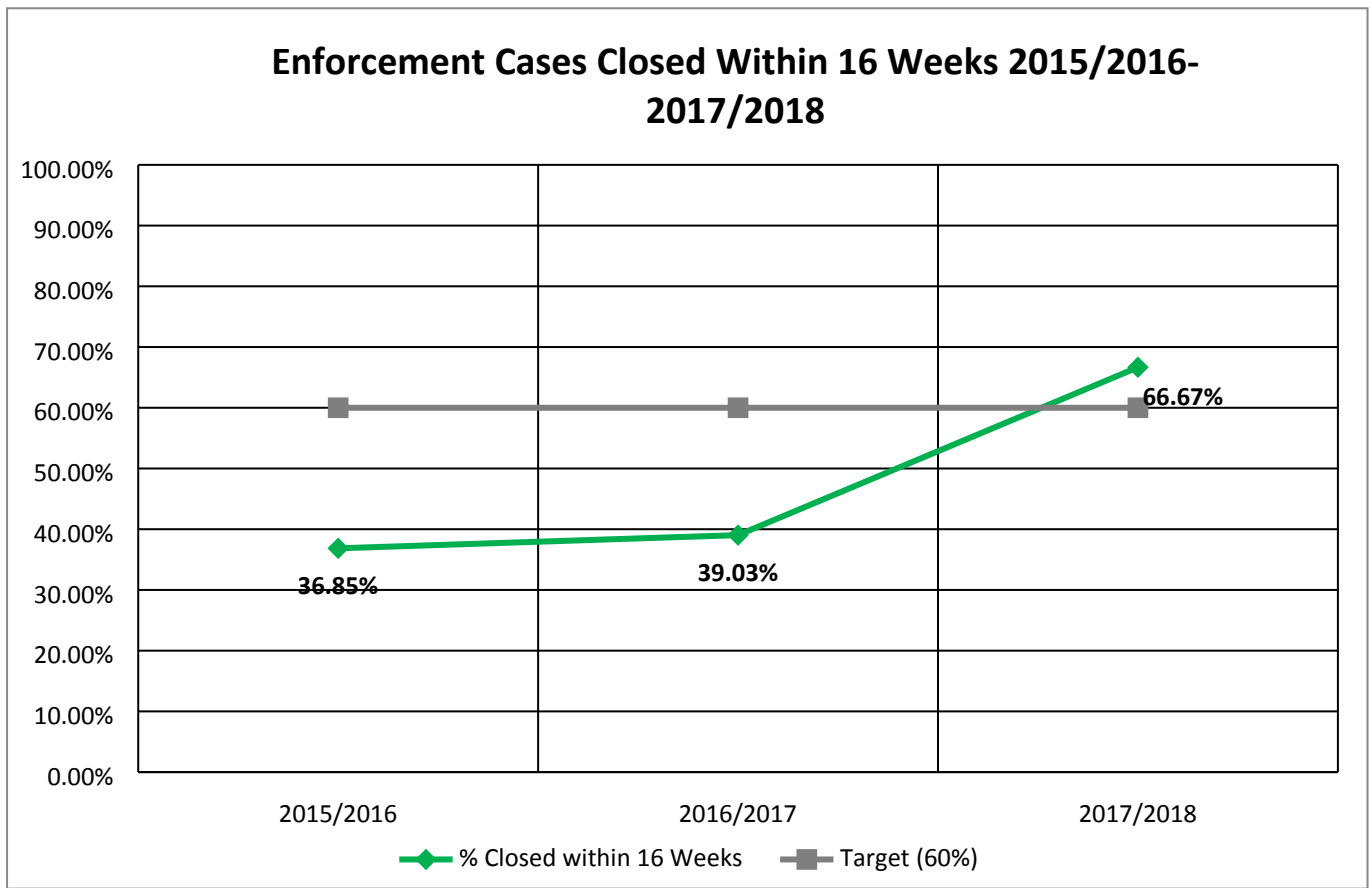
6.6.1 The NPPF states that effective planning enforcement is important in maintaining public confidence in the planning system, so that unauthorised structures and uses do not undermine the purpose of development management. Enforcement action is discretionary, and local authorities should act proportionately in responding to suspected breaches of planning control. Local authorities are encouraged to produce local enforcement plans.

6.6.2 A key achievement within the monitoring period was 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.

6.6.3 The Council has a corporate target to close 60% of enforcement cases within 16 weeks of them being opened. At present 67% of cases are closed within this timeframe, which is a significant improvement from previous years.

6.6.4 The Planning Enforcement and Direct Action Policy 2017 is used to prioritise cases and illustrates what people can expect from the service.

Figure 6.1 - Enforcement cases closed within 16 weeks



7 Conclusions

7.1.1 The Council has made impressive progress in a number of areas throughout the 2017/18 AMR monitoring period.

7.1.2 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.

7.1.3 The numbers of housing approvals continues to be at a level below the annual completions target; however the borough has an adequate housing pipeline and the Council can demonstrate a five year land supply including a 20% buffer. 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.

7.1.4 Housing delivery has declined compared with the previous year, and whilst numbers are expected to recover in subsequent years, meeting targets (and thus making a greater contribution to meeting housing need) will continue to be a challenge in the context of the draft London Plan; it will be necessary to identify more potential housing sites, ensure that windfall sites are of a suitable quality, and secure additional funding for new infrastructure.

7.1.5 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.

7.1.6 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.

7.1.7 Overall, Development Management and Enforcement performance is much improved, with an increase in the pace of determining planning applications such that all major targets are now being met or exceeded.

7.1.8 Future AMRs will continue to assess the performance and effectiveness of Redbridge's planning policies in delivering the key objectives of the Local Plan.

Appendix 1 - Abbreviations

Abbreviation	Term
AAP	Area Action Plan
AMR	Authority Monitoring Report
AQAP	Air Quality Action Plan
BWPP	Borough Wide Primary Policies
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government (now MHCLG)
DPD	Development Plan Document
dph	dwellings per hectare
EiP	Examination in Public
GLA	Greater London Authority
GPDO	General Permitted Development Order
HDT	Housing Delivery Test
HMO	House in Multiple Occupation
IDP	Infrastructure Delivery Plan
LDD	London Development Database
LDF	Local Development Framework
LDS	Local Development Scheme
LSOA	Lower Layer Super Output Area
MCIL	Mayoral Community Infrastructure Levy
MHCLG	Ministry of Housing, Communities and Local Government
NPPF	National Planning Policy Framework

Abbreviation	Term
NPPG	National Planning Practice Guidance
OAN	Objectively Assessed (Housing) Need
PPG	Planning Practice Guidance
S106	Section 106
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SPD	Supplementary Planning Document
SUDS	Sustainable Drainage Systems
TfL	Transport for London
ULEZ	Ultra Low Emission Zone
VOA	Valuation Office Agency