

CED007 Council's Response to Issue 4

Issue 4:

Are the Investment and Growth Areas properly defined, do they positively promote the spatial vision and objectives for Redbridge and are the expectations for growth justified and deliverable?

Questions:

- i) What is the rationale for the selection of the Investment and Growth Areas?**
- 1.1 The Key Diagram on page 17 of the Local Plan shows the Council's spatial development strategy. Policy LP1 identifies the five Investment and Growth Areas of Ilford, Crossrail Corridor, Gants Hill, South Woodford and Barkingside that will accommodate much of the borough's growth over the life of the Plan.
 - 1.2 The Investment and Growth Areas boundaries are 'conceptual', specifically to illustrate the overarching strategic approach to development. They are not intended to be prescriptive with definitive boundaries. This reflects paragraph 156 of the NPPF and the need to indicate broad locations for strategic development in the plan. They do provide the overarching concept guiding the location of new development and policy LP1 expresses this intent. Further policy direction for each area is set out in policies LP1A – LP1E.
 - 1.3 These areas play an integral role in delivering the borough's expected growth, and the Council considers that they will positively promote and deliver the spatial vision and objectives set out in Section 2 of the Plan.
 - 1.4 The rationale for their selection is that the Investment and Growth Areas are highly accessible locations, designated town centres and well connected to the borough's public transport network. They also offer a range of investment opportunities through identified developable and deliverable sites with substantial capacity to accommodate new homes, jobs and infrastructure in sustainable locations.
 - 1.5 Early on in the plan-making process, at Preferred Options Stage (2013), and to respond to the significant development challenges, it was recognised that a spatial strategy was required to achieve a sustainable balanced approach to growth, in a way compatible with the specific context and constraints of Redbridge. Central to this was the identification of locations capable of accommodating balanced growth. Five Investment and Growth Areas were identified, because of their ability to meet the following criteria:

- well connected to the borough's transport network;
- represent an efficient use of land;
- the availability of deliverable sites with substantial capacity to accommodate growth;
- capable of delivering new community infrastructure;
- easy access to jobs, services and facilities of town centres;
- deliver development of high quality design;
- protect built heritage and respect the character of established residential areas;
- ability to provide improvements to existing open spaces and potential to create new accessible public open space; and
- embrace possibilities to reduce carbon dioxide emissions from new development and thus help mitigate climate change.

1.6 The SA process has recognised these broad locations for growth. Furthermore, work in 2014 and 2016 explored the merits of focusing growth in the Western Corridor (Woodford-Wanstead) but through the process of consideration of reasonable alternatives, this approach was discounted.

1.7 Alongside the above, it is important to emphasise that the Council fully recognises that each of the Investment and Growth Areas are distinct in their own way with their own individual context and character. This is reflected in the amount of development proposed in each of the areas, (as clarified in modified Table 3 in LBR 1.01.2) and further supported by the work undertaken to assess capacity of each Development Opportunity Site after considering public transport accessibility levels, local context and other site 'constraints'. This is emphasised in paragraphs 3.2.1-3.2.4 of the Local Plan

ii) Will the infrastructure required for the Investment and Growth Areas be delivered in a timely fashion to keep pace with development? How is it to be funded? Does the Infrastructure Delivery Plan (LBR 2.21) provide sufficient certainty? How and when will the infrastructure be triggered?

2.1 Yes, the infrastructure required for the Investment and Growth Areas will be delivered in a timely fashion to support development. The Infrastructure Delivery Plan (IDP) (2017) (LBR 2.21) assesses demand for and planned provision of a range of infrastructure types including

education, health facilities, transport, community and leisure facilities to keep pace with development.

- 2.2 The IDP provides a basis for ongoing coordination with Council service areas and other infrastructure delivery agencies to plan positively for the provision of new community infrastructure to meet the timing and location of community infrastructure needs. This reflects the approach set out in the NPPG (paragraph 162).
- 2.3 Appendix 2 of the Local Plan identifies a schedule of key infrastructure projects necessary to support growth. As with any list of this nature, and as is anticipated by the NPPF at para.177, there is more certainty and detail regarding infrastructure which is programmed to be delivered in the early part of the plan period. There is nevertheless considered to be at least a "reasonable prospect" that all anticipated infrastructure is deliverable and will be delivered in a timely fashion, as required by the Framework at para.177. The delivery of items beyond this timeframe will be subject to further feasibility and availability of funding.
- 2.4 The IDP has identified the need for a range of infrastructure types to support growth. However, it has in particular emphasised education and health facilities as being essential to enabling sustainable development over the plan period. As such, the Council is proactively working with its Education Department and health partners early on in the process to ensure these facilities are delivered in a timely manner to support development.
- 2.5 Further details in relation to delivery and funding are set out below.

Delivery

- 2.6 The Local Plan, in policies LP1A-1E, directly makes provision for infrastructure including references to the need for new schools and health facilities, in particular, on the key strategic sites. These pieces of infrastructure can therefore be expected to be delivered as part of the development brought forward on the Green Belt strategic sites. The masterplanning of these sites will further provide this delivery mechanism.
- 2.7 The Council over the last ten years has had an effective education delivery programme for both primary and secondary school places. It has responded to the rapid increase in its child population and increased its provision of school places accordingly. Moving forward, it is confident that it will be able to provide sustainable school places to ensure it meets its statutory obligation in the provision of school places.
- 2.8 Plans are already in place to provide further school provision across the borough. The Council at its Cabinet meeting in October 2016 agreed further provision of existing school expansions to meet projected demand by providing an additional 1,470 primary school places and 420 secondary school places. Plans are in place for the delivery of the 1,470 primary places and funding secured. The additional 420 secondary school places

are to be provided through the expansion of Wanstead High School which is currently at initial feasibility stage.

- 2.9 In addition to this, there has been interest from two approved free-school providers, City Gates and the Harris Academy.
- 2.10 The City Gates are working with the Education Funding Agency (EFA) to secure a site within Redbridge for an all-through school providing a total of 1,260 places, and likewise, the Harris Academy are seeking to provide 1,260 secondary school places. Free-school providers that come through the free-school waves are fully funded by the EFA, at very little or no cost to the Council.
- 2.11 The additional places to be provided by the Council alongside the two approved free-school providers will ensure that sufficiency of school places for Phase 1 of the Local Plan (2015-2020). Furthermore, the EFA and free school providers are already aware of the Local Plan's proposed school sites as referred to above, and when these sites come forward, officers will work with the EFA to secure free-school provision through the free-school wave programme.
- 2.12 To ensure that there is sufficient provision of school places going forward, the Council will continue to work with existing schools in areas of projected demand to undertake feasibilities for possible expansions of existing schools. A number of expansion feasibilities have been undertaken in schools in the west of the borough to facilitate possible expansions to meet demand from additional housing developments (see Table 6B on page 21 of the IDP).
- 2.13 In addition to this, the Council's annual update on Pupil Place Projections will trigger when specific education infrastructure is required, therefore, ensuring that infrastructure is aligned with demand. These updates are reported to Cabinet on an annual basis, allowing ongoing monitoring and review to take place.
- 2.14 In relation to health, the Council is taking a proactive approach, actively engaging with the Redbridge CCG which is committed to closer working to ensure health needs are met.
- 2.15 The Redbridge Primary Care Capacity Plan (LBR 2.22) analysed the additional health requirements over the lifetime of the Plan in three equal 5 year phases so that the NHS could better understand when the increased capacity would be required. The local NHS is therefore confident that the required additional capacity outlined in the Redbridge Primary Care Capacity Plan will adequately address the primary healthcare space requirements over the life of the plan.
- 2.16 Sections 8.10-8.18 of the IDP (LBR 2.21) explain the CCGs approach to planning for future healthcare. The borough is divided into four "localities". The Primary Care Infrastructure Plan (document, LBR 2.22) concludes that the nature of the existing estate (much of it in converted

domestic premises), along with existing patient to GP ratios, indicates limited scope for greater utilisation of the existing estate through matters such as refurbishment, physical extensions, and extended opening hours. As such, some new healthcare facilities will need to be provided alongside investment in those areas of the existing estate that does offer scope for greater utilisation.

- 2.17 Across the borough, key requirements over the Local Plan period can be broken down as follows:
- Cranbrook and Loxford – investment in Loxford Polyclinic to enable better utilisation in the early phases of the plan, and provision of a new health hub as part of developments proposed in Ilford town centre;
 - Seven Kings – investment into some reconfiguration of Newbury Park Health Centre, provision of a new health centre at Goodmayes, and a new health hub as part of the proposed redevelopment at King George and Goodmayes Hospitals;
 - Fairlop – investment in some reconfiguration of Hainault Health Hub, and redevelopment and modernisation of Fullwell Cross Health Centre or provision of a new Locality Hub as part of the proposed Oakfield redevelopment;
 - Wanstead and Woodford – redevelopment of Wanstead Hospital as new locality hub and key worker accommodation, and investment in South Woodford Health Centre to increase capacity.
- 2.16 In recognition of the above, the Council is taking a proactive approach to responding to these critical infrastructure needs. It has established a Corporate Regeneration Growth Board which draws together all Council services involved in regeneration and growth. The Board will co-ordinate and prioritise strategies and actions both within the Council and with partners to ensure that all agencies play their part in delivering the regeneration agenda and the key infrastructure projects identified within the IDP.
- 2.17 In addition, the delivery of the Elizabeth line (Crossrail, line 1) is a fundamental component of the growth strategy articulated in the Local Plan. Creating and improving access and links within and between growth areas is also essential to the delivery of successful places. This is reflected in the Local Plan policies.
- 2.18 Community facilities play a particularly important role as spaces for local delivery of other activities associated with a range of type of provision, for example, early years activities associated with children’s centres and further education. Opportunities to redevelop and provide new purpose built provision with enhanced capacity, or in locations more in line with demand, should also be considered throughout the life of the plan particularly in relation to libraries and community facilities.

- 2.19 The delivery of infrastructure is a corporate priority and the Council will take a positive partnership approach to ensure that the necessary services and facilities are provided to support sustainable healthy communities.
- 2.20 Regular monitoring associated with the Plan and IDP, and working closely with our partners in the delivery of the Local Plan will help in the identification, as early as possible, of matters and situations that may affect delivery.

Funding

- 2.21 Infrastructure funding will come from a range of sources. The Council will continue to use Community Infrastructure Levy (CIL)/s106 alongside its budgets and other central government funding to ensure timely delivery of necessary infrastructure.
- 2.22 On its own, CIL is insufficient to fund big new capital projects, however, it will be used to mitigate impact of particular development, and as such will contribute to the borough's infrastructure needs.
- 2.23 The Council will be reviewing its CIL Charging Schedule and associated Regulation 123 List following adoption of the Local Plan.
- 2.24 The Regulation 123 List will be updated to accurately reflect the priorities of the IDP to ensure monies raised through the collection of CIL can be spent to deliver the right community infrastructure in the right place. This update will enable detailed consideration to be given to the legislative framework set out in the CIL Regulations 2010 (as amended) which 'polices' the divide between what can be secured via CIL and S106.
- 2.25 Insofar as contributions are being sought from developments via s106, it is clear from the Local Plan Viability Assessment (2016) (LBR 2.11) that realistic and robust assumptions as to funding have been assessed and would not render development unviable.
- 2.26 Since the Director of Public Health has sat within the Council, this has enabled a continuous dialogue to better understand the implications of growth projected through the Local Plan. This helps shape and monitor the Council's capital programme at high level –providing advice and guidance and taking corrective action as required.
- 2.27 In relation to education infrastructure, it is important to point out that for the period 2017-2020, Redbridge has been successful in securing basic need capital funding of £54,354,698 from the Department of Education. Further expansions of existing schools would be funded through the basic need capital funding, some CIL funding, and the Council's capital programme. Any new schools would be delivered and funded by the EFA through the free-school wave programme. The Council has a long history of ensuring sufficient education provision, securing funding through basic

need allocations and working with external providers to ensure it provides sufficient education for its residents.

- 2.28 To aid delivery of the necessary additional health facilities, the CCG have included the requirements in the East London Health and Care Partnership (the NHS Strategic Transformation Plan (STP) area within which Redbridge is located). The STP is anticipated to be the level at which the strategic estates functions of the NHS is to be carried out in future. Whilst it is likely that some CIL funding will be sought, the NHS is not solely relying on this for the delivery of premises.
- 2.29 The NHS is also actively investigating robust funding options including joint ventures and NHS Local Improvement Finance Trust (LIFT). This will be in addition to potential funding from the central NHS at the STP level, and unlocking and recycling of receipts for disposals of redundant estate disposal.
- 2.30 The Council will be reviewing its own assets to explore innovative ways in which various other types of community infrastructure could be provided. In areas where there are greater levels of demand, the delivery of facilities such as community hubs, which could incorporate a number of services such as nursery provision, library space or pharmacies, will contribute to the borough's infrastructure needs and the delivery of sustainable liveable neighbourhoods.