

Statement Regarding AECOM Sustainability Report 2017

1. Introduction

- a. A new sustainability appraisal by AECOM is dated March 2017 (lbr 1112 Redbridge Interim Sustainability Report 2017). We wish to add further to the comments in para 3.7 of our Representation “Oakfield Objection”. The para referred to the London Plan housing target for Redbridge. We claimed that exceeding this target should not be at the expense of losing land which fulfils important Green belt objectives and in addition meets other important aims such as the provision of high quality sports facilities and social amenity.
- b. This is a matter of judgement to which we wish to add our local knowledge. In his letter of 7th June 2016 addressed to Members of Parliament for English Constituencies, the Minister of State for Housing and Planning (Brandon Lewis) said: *“The [NPPF] Framework makes it clear that . . . Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. . . . Local Authorities working with their communities and with detailed local knowledge, which are best placed to decide the most sustainable, suitable and viable sites for new homes.”*
- c. On the basis of our detailed local knowledge, whilst recognising the need for housing to meet the needs of the growing population, thousands of local people have weighed the need for housing against the loss of Oakfield.
- d. The certainty of the value and accessibility of Oakfield as cherished open space Green Belt and acclaimed sport and recreation facility has been described elsewhere. In this Statement we ask the Inspector to weigh the uncertainty of the quantum of housing need against the harm that would be

done if the certainty of covenant-protected Oakfield's contribution to the community is lost.

2. Sustainability

- a. Oakfield, as it is now, contributes hugely to the sustainability of Redbridge as a borough and as a healthy and cohesive community.
- b. The AECOM "Sustainability Appraisal (SA) of the Redbridge Local Plan" is to be found in the Council's evidence base - lbr 1112 Redbridge Interim Sustainability Report 2017. It is dated March 2017, after the Reg 19 consultation period and contains changes to the earlier Sustainability Appraisal. We therefore take the opportunity to comment here.
- c. We start with the end! The first line of the "Conclusion" in the Appendix on p44 says it is not possible to rank the [Green Belt] site options in terms of 'sustainability'. It goes on to conclude that a site may have one drawback and numerous benefits, but that one drawback may weigh heavily 'in the balance'. 'It is for plan makers, rather than the SA, to balance competing objectives'.
- d. Oakfield has many benefits which do weigh very heavily in favour of retention as both Green Belt and as a Sport & Recreation ground with valued community facilities.
- e. Furthermore, para 2.3.1 refers to the Council intention that the final choice between options is being informed by the views of residents and other stakeholders which allows the Borough to grow sustainably, in a way that balances the long social, economic and environmental needs of the Borough. Para 2.3.6 admits to the large number of representations backing Oakfield.
- f. In line with a long list of other bodies and thousands of individuals, the Save Oakfield Society has pointed to the immense contribution made on Oakfield to community amenity and towards the social cohesion of the Borough. Since this is not doubted and has not been challenged, it should weigh heavily in any assessment of the sustainability of the Local Plan.
- g. This may affect judgement of both quantum and distribution of housing.
- h. Para 2.4.6 refers to the 'quantum' of housing. It accepts that the Objectively Assessed Housing Need (OAHN) cannot be met in full given the likely conflicts with policy objectives. Then para 2.4.7 turns to 'distribution'. Its last bullet point refers to the possibility of relaxing some criteria within the Green Belt to identify additional

'least worst' sites for housing development. There are indeed parcels of Green Belt that appear to provide no social benefit at all, including South Roding (ref . . .) and the Tomswood Hill (ref ...) sites. Such sites carry very little weight that we can detect in any analysis of sustainability and yet, perversely, they have not been included in consideration of development options.

- i. Table 2.1 on p7, para 2.4.9 compares 'quantum' and 'distribution'. This indicates that Oakfield is not needed with any degree of certainty until there is a definite requirement to build 19,450 homes. This is way above what Redbridge is seeking.
- j. Box 2.4, Table A on p14 counts the additional homes that would be achieved by increasing development densities in some non-Green Belt development sites as recommended by the GLA. Maximising densities per Option 2 would enable a further 2,889 homes to be built on non-Green Belt land. (The report states this as 448 but that mistakenly repeats the figure for Option 1.) Whilst not suggesting that Redbridge should maximise densities everywhere, it does indicate that there are options that would significantly reduce or eliminate development on Green Belt. Oakfield is not needed for development.
- k. This is confirmed in Box 2.6 on p22 which calculates the amount by which the London Plan target would be exceeded with higher densification with and without Green Belt release. Even without any Green Belt release the London Plan could be exceeded by over 10% (or over 1,600 homes).

3. Uncertain Population Projections

- a. The Pre-Submission Local Plan says (para 1.14.3) that the population of Redbridge is expected to rise to 362,000 by year 2030. This is based on a GLA 'short term migration scenario'. 'Short term' means taking migration figures over the previous 5 year period.
- b. But the North East London Housing Market Assessment (Published September 2016 by Opinion Research Services for the LBR Evidence Base) says in its conclusions on p. 47 para. 3.3.6 that "The long-term migration trends provide the most robust and reliable basis for projecting the future population".
- c. The GLA's latest projection for 2030, using the more reliable long term migration trend produces a total population of 354,890 which is lower than the Local Plan figure of 362,000.

	<u>2011</u>	<u>2015</u>	<u>2030</u>
LBR Pre-Submission Local Plan para 1.14.2/3	279,000	296,800	362,000
GLA Projections as at 2015 - "Short Term Scenario"	281,520	297,416	356,625
GLA Projections as at 2015 - "Long Term Scenario"	281,520	297,557	354,890

- d. The "Objective" numbers are more confused when the Local Plan (para 1.14.2) quotes ONS mid-year estimate for 2015 as 296,800 which is lower than the GLA figures for the same year.
- e. The conclusion must be that the safest estimate would be 354,890. This is **7,110 less** than the 362,000 cited by the Council. Put another way, the population increase projected by the GLA Long-term Growth Scenario is 11% less than the growth projection used by the Council (57,333 rather than 65,200).

4. Uncertain Migration

- a. Between 2001 and 2011 the ONS data for Redbridge shows the UK born population fell by 4,895 which does not support the Council's view that growth has been largely due to increasing birth rates and decreasing death rates. In fact, population growth projections are based on historic levels of international migration which are not sustainable and unlikely post Brexit.
- b. Domestic Inward migration was 16,383 in 2011 and is projected to rise steadily to 20,108 in 2030. Domestic Outward migration was 16,468 in 2011 and is projected to rise steadily to 22,140 in 2030. The net Domestic migration is thus projected to be negative (minus 85 rising to minus 2,032 in 2030).
- c. International Inward migration was 5,226 in 2011 reducing 3,847 in 2013, jumping to 5,189 in 2014 and then remaining steadily at 4,419 until 2030. International Outward migration was 2,223 in 2011 reducing to 1,786 in 2014 but then projected to rise steadily to 2,321 in 2030. The Net international migration was thus 3,003 in 2011 and projected to be 2,198 in 2030.
- d. But the International projections were estimated before the decision on Brexit and thus must therefore be even more doubtful now than any 15 year projections would be looking so far ahead in a stable environment.

- e. We therefore conclude that the Local Plan is unsound. It depends on highly doubtful Migration projections to justify the loss of the undoubted community value of Oakfield. To weigh the uncertain more heavily than the certain is unsafe.

5. Uncertain Housing Numbers

- a. The lower population growth as above would represent a reduction of about 1,750 homes required in the period 2015 – 2030.
- b. The Local Plan, Table 2, Strategic Objective 1: Promoting and Managing Growth, says:
- “Deliver up to 18,500 new homes” (2015 - 2030) – [which equates to 1,233 pa.]
- “Deliver annual housing target of 1,123 – [which equates to 16,845 homes.]”
- c. This large variance in the housing objectives is contradictory and suggests the Council is unsure what its objectives are. **The higher number is unsound.** If the revised population projections in the long term migration projections are used, the GLA’s minimum housing growth target of 16,845 is much nearer the mark than the higher number of 18,500. Indeed, if the higher number is reduced by the 1,750 fewer homes suggested by the revised population projections, the “up to” housing number would be reduced to 16,750 for the 2015 – 2030 period.
- d. LP2 repeats the lower figure – “The Council will deliver a minimum target of 16,845 new dwellings. . .” And para 3.8.4 confirms “The London Plan (2015) sets a minimum housing target . . . of 1,123 dwelling per annum. . . 16,845 homes . . . based on a thorough assessment of housing capacity.”
- e. But it goes on to say that “The Strategic Housing Land Availability Assessment (SHLAA) (2013), undertaken by the Mayor, plus additional sites identified by the Council . . . [in Appendix 1 – Opportunity Sites - which brings] the capacity to accommodate up to 18,474 homes (including an allowance for windfall)”.
- f. Thus, the Council has offered up Opportunity Sites, including Green Belt and Sports Pitches, which capacity was then added in to the SHLAA. The Council now argues that the reason for wanting to redraw Green Belt boundaries is to meet the SHLAA housing capacity which it describes as the housing need. That is a circular argument, a tautology. It is NOT an objective assessment which requires more space. It is an offering up of space prior to assessing housing need.

6. Affordable Housing Targets

Local Plan para 3.9.5 adopts a strategic affordable housing target of 30% and a corporate affordable housing delivery target of 336 homes per year (5,040 units over the plan period 2015 – 30). To achieve 5,040 affordable homes, the total homes to be delivered would be 16,800. The GLA's minimum of 16,845 (based on long term migration assumptions) would therefore be reasonable on this basis.

7. Windfall

The previous windfall assumption was 270 units pa for the duration of the 15 year plan. This would have been 4,050. By allowing no windfall in the years 2015 – 20, the Council has reduced windfall by 1,350 (more than double the Oakfield proposal). When amending the previous plan, LBR has contrived to place "no reliance on windfall" and to rely "solely on the delivery of allocated Opportunity Sites" in the first 5 years (Fig 12, page 39, Local Plan). At the same time, LBR has effectively doubled its own "objectively assessed housing need" to 31,997 (6.1.6, page 121, Local Plan). This suggests that the previous targets were not objective.

8. Schools

A 'Conclusions' table on p33 scores the options for Education. Although not the central theme of this Statement, we should like to add that we find it strange to place a new school in Barkingside, Ilford North. There are 5 primary schools within 500m of Oakfield, and 5 secondary schools within 2000m. Redbridge's admissions data shows almost 80 primary vacancies and 105 secondary vacancies remaining after the 2013 admissions process was finished.

9. Conclusion

We believe that Oakfield need not be listed as an Opportunity Site. Its Green Belt purpose and high quality sports and social amenity value, as reflected in its listing as an asset of community value, outweigh the dubious need for housing at the higher levels postulated in the Local Plan.

Although not considered in depth above, the obvious point as already questioned by the Inspector, is that Brexit add further uncertainties – and on a scale that cannot yet be assessed.

Dr Chris Nutt & Simon Copsey

Save Oakfield Society - 10th May 2017