



Redbridge Local Plan (2015 – 2030)

The purpose of this letter is to oppose in the strongest possible terms the London Borough of Redbridge Local Plan 2015-2030 that proposed Oakfield Playing Fields being de designated as Green Belt land and the protection this affords. We believe the plan to be unsound and did not follow due process and have addressed below the questions raised by the Inspector regarding Oakfield.

LPFF Role

The London Playing Fields Foundation (LPFF) is a registered charity founded in 1890 and granted a Royal Charter in 1925. It is the main charity for the provision, protection and promotion of playing fields in London and over the past 127 years the LPFF have built up a great deal of knowledge and operational experience in running sports grounds and providing a range of sports development opportunities. We operate seven playing fields across the capital and continue to work with and provide advice to a variety of strategic organisations including Sport England, GLA, and Local Authority partners, National Governing Bodies of Sport, London Marathon Charitable Trust, Football Foundation and different Primary Care Trusts.

By adopting a strategic approach, we advocate the need for better protection of playing fields to safeguard them for future generations of Londoners and are working with a range of key partners to reverse the cycle of playing fields decay and to ensure that there is no net loss of pitches. Once playing fields are lost to development they are lost forever and we believe that the best form of protection is by using the fields for the primary purpose of sporting and recreational activity. This is certainly the case at the Oakfield site.

The LPFF oppose the London Borough of Redbridge Local Plan 2015-2030. We believe that the plan is neither legally compliant or sound and that the council failed in its duty to co-operate. The plan is neither robust, effective or deliverable and lacks support from the local community and key stakeholders. It has not been positively prepared and has paid scant regard to due process and community consultation.

Specific questions raised by David Smith that he wishes to address on 14th June are:

- 1) Is the strategic site at Oakfield, Forest Road (site 133) justified when compared to other reasonable alternatives, deliverable within the plan period having regard to any constraints and consistent with national policy? Is the detail about the site allocation adequate in respect of use, form, scale, access and quantum of development? Could it provide the number of dwellings anticipated having regard to the concept masterplan (LBR 2.78)? **[NO]**

The Local Plan is not currently underpinned by a robust and up to date assessment of the needs for open space, sport and recreation facilities and therefore housing delivery is being considered in the absence of key information. The London Borough of Redbridge has listed Oakfield as an opportunity site for development, but as stated in the Redbridge Playing Pitch Strategy, the site is **not** surplus to requirements and is still needed for sport and recreation purposes to meet the needs of the local community. The proposed replacement facilities must provide facilities of the same quality or better and we believe that this would be uneconomic to deliver. The two reports commissioned by the Borough to test alternative provision have not been endorsed by Sport England or the National Governing Bodies who



have grave reservations over the independence and validity of the reports. The PJA Report even highlights that neither Forest Road or Hainault Recreation Ground cannot provide the same level of quality as Oakfield without incurring extensive uneconomic costs. Therefore, the betterment test within the NPPF has not been met and fails to conform to National Policy.

- 2) Does Oakfield meet any of the 5 purposes of the Green Belt in paragraph 80 of the NPPF? **[YES]**

In accordance with paragraph 83 of the National Planning Policy Framework (2012), Green Belt boundaries should **only** be altered in 'exceptional circumstances', through the preparation or review of the Local Plan. Paragraph 80 of the NPPF sets out the five purposes of the Green Belt which area to:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

There are insufficient exceptional circumstances to justify the removal of Green Belt status. Ironically there is no mention in the Redbridge Playing Pitch Strategy of Oakfield being in the Green Belt; that it has the protection of a Restrictive Crown Covenant and that the site is registered with the London Borough of Redbridge as an Asset of Community Value.

- 3) Has there been any material change in circumstances since the original designation of the Green Belt? **[NO]**

Oakfield has been an important part of the Green Belt since the 1930's and the rationale and facts have not changed. It provides a high quality sustainable environment that is well supported by its diverse multi-cultural community. The pavilions built on the site in the 1930's are ancillary to the use and contribute to the intensive use of the site by the local community. The Central Line that is adjacent to the site was constructed in 1902.

- 4) Having regard to paragraph 74 of the NPPF would the loss of existing open space, sports and recreation buildings and land be replaced by equivalent or better provision in terms of quantity and quality in a suitable location? **[NO]**

Paragraph 74 of the National Planning Policy Framework makes it very clear on what grounds a playing field can be built on, namely:

*“Existing open space, sports and recreational building and land including playing fields should **not** be built on unless:*

- *An assessment has been taken which has clearly shown the open space, buildings or land to be surplus to requirements or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location or*



- *The development is for alternative sports and recreation provision, the needs of which clearly outweigh the loss.”*

This is also reinforced in the London Plan policy 7.16 which states:

‘the strongest protection should be given to London’s Green Belt, in accordance with national guidelines. Inappropriate development should be refused, except in very special circumstances.’

The Government’s National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. Protecting, enhancing and providing opportunities to participate in sport is fundamental to creating sustainable communities and the proposed development of Oakfield playing field would not comply with paragraph 74.

The justification of the loss of the Oakfield site is not based on robust evidence. The Playing Pitch Strategy (PPS) 2016 was only undertaken after the council were challenged by Sport England and even then, the process adopted was not properly executed. Two additional studies were commissioned by the council to test alternative provision, but these have not been approved by the recognised National Governing Bodies, the Football Association, England and Wales Cricket Board or Sport England and pre-date the final version of the Redbridge Playing Pitch Strategy.

There was a presumption that Oakfield and Ford Sports Ground were to be redeveloped even before the PPS was undertaken and this suggests that the plan has not been objectively prepared. We are also aware of evidence that indicates the Council has sought to influence the consultant reports so that the results and recommendations meet the Council’s required outcomes rather than provide a professional independent assessment to inform the local plan process.

Oakfield Playing Fields comprise twelve full size and seven junior size grass football pitches and four cricket grounds as well as two large pavilions which act as an inclusive sports and social hub. The site is an important site not only to the residents of LB of Redbridge, but to those in surrounding London Boroughs, Essex and beyond who use the facility every week. Oakfield playing fields provide a high-quality sport offer. The excellent playing facilities provide for upwards of 1,000 regularly players from age eight through to adult and is a key grassroots community hub for football and cricket.

The Local Plan fails to adhere to the National Planning Policy Framework and the Council have not provided clear and convincing reasoning to justify the approach taken. Sport England, The FA and the ECB all strongly oppose the allocation of the Oakfield site for housing development. The allocation of this valuable and well used site for community sport is entirely contrary to Government policy, and in particular paragraphs 70, 73 and 74 of the NPPF.

National Planning Policy Framework

The National Planning Policy Framework sets out the Government’s planning policies for England and how these are expected to be applied. It sets out the Government’s requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable



councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

In achieving Sustainable Development there are three dimensions: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;
- and an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

The facilities at Oakfield, used by up to 1,000 people each week, provide a sustainable, high quality environment that acts as a community hub reinforcing the principle of sustainability and ensuring better lives for everyone including future generations. This was confirmed in the PPS that stated ‘the playing pitches at Oakfield are of a higher quality compared to pitches that are of a poorer quality elsewhere in the borough.’ The management and maintenance of the pitches are undertaken by the resident clubs without a reliance on council resources, thus reinforcing the sustainability of the site.

The protection of this valuable site is necessary to deliver the policies of the Council outlined below.

NPPF Promoting Healthy Communities Paragraph 73.

The Redbridge PPS states it will ensure that the Council meets the requirements of paragraph 73 of the National Planning Policy Framework (NPPF) (i.e. a robust up to date assessment).

“Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.”

However, it singularly fails to report that the protection and provision of opportunities to participate in sport is fundamental to the health and well-being of communities and means that local authorities must plan and provide accordingly through local planning policy and development management. Without robust and up-to-date evidence and policies, there is a risk that a local plan could be considered unsound. We believe that the Local Plan in its current format is unsound and should be amended.



The National Planning Policy Framework also makes the need for such consideration clear in its requirements to:

- deliver community and cultural facilities to meet local needs;
- protect existing sports and recreational buildings and land;
- guard against the unnecessary loss of valued facilities and services;
- promote mixed developments;
- plan positively to provide opportunities for outdoor sport in the Green Belt; and
- ensure that decisions are based on robust and up-to-date assessment of need.

The Redbridge PPS fails to address paragraphs 70 and 74 of the NPPF that also place great emphasis on the **protection of existing sporting facilities**.

Paragraph 70 *“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”*

In examining the Planning Policy Framework within the Redbridge PPS, the proposals for the development of Oakfield are contradictory. The PPS report found that there is a need to retain all existing playing pitch provision and that there is a need to improve the quality of the ancillary provision and yet **alternative** playing pitch site assessments were undertaken before the completion of the PPS. The Cundall Report and a separate Agronomist Report produced by Peter Jones Associates were undertaken prior to the adoption of the Redbridge PPS and materially sought to influence the decision-making process.

- 5) How can it be certain that replacement provision will be equivalent or better when the Feasibility Report for Oakfield Playing Pitch Re-provision (LBR 2.44.1) has not assessed the quality of pitch provision at Oakfield? **[IT CANNOT]**

The London Borough of Redbridge has suggested that alternative provision at Hainault Recreation Ground and/or Forest Road would be suitable replacements for Oakfield. Replacement facilities must be of the same quality or better and in a suitable location but neither of these sites are considered to be a suitable replacement by Sport England, the FA or the ECB. The fact that they are existing sports grounds would mean further displacement of existing users. Of major concern is that the two reports commissioned by the council both fail to address quality issues and would not provide re-provision unless incurring hugely uneconomic costs. The documents themselves fail to address quality issues and do not adhere to National or Regional policy.

- 6) How will the cost of re-provision and future maintenance be funded? **[NOT KNOWN. COST WILL BE HIGHER BUT COUNCIL BUDGET IS BEING REDUCED.]**

It is unclear at this stage how the capital cost of re-provision and the ongoing maintenance of the new sites would be funded. The PJA Report recommended the preparation of detailed design specifications and cost plan for the site but to date we are unaware of how it is to be funded. There is also a need to factor in the re-provision and settlement period of the pitches



before any work is undertaken at Oakfield. In our view to replicate the quality provision at Oakfield would take several years.

- 7) In sporting and recreational terms is it justified to replace an existing, established facility with a new one? **[ALTERNATIVE IS NOT A NEW ONE – IT IS EXISTING SPORTS & RECREATION FIELD.]** Has sufficient account been given to youth provision and the needs of adjoining Boroughs? **[NO]**

The alternative proposals for Oakfield are not replacing the existing facility. Both Hainault Recreation Ground and Forest Road are existing sports grounds and any development on these sites to improve the quality would be expensive. There is an argument for the replacement of some old facilities to relocate them in better locations to promote improved quality and access, but this must be in a planned way with facilities that are fit for purpose, meet identified needs and complement existing provision. In the case of Oakfield, playing fields by their definition cannot be relocated easily and therefore the expense of re-provision with the same or improved quality is unlikely.

Youth provision is well established and an integral part of the management and operation of the clubs at Oakfield. The Jack Carter pavilion is used by Hainault and Clayhill Cricket Club; Eithad Cricket Club, East London Cricket Club and Oaks Park School and East London Boys School. As stated in the Redbridge PPS there is significant demand for club cricket particularly from junior teams which continue to grow in number. Old Bealonians hires football pitches for its 23 youth teams and 9 adult sides. This is in addition to Old Parkonians Cricket with 8 adult teams and 4 junior teams. Playing pitches at Oakfield are hired out to other clubs outside of the borough at peak times when not required by the Old Parkonians.

It is important to recognise that sports participants do not recognise borough boundaries and migrate to the best pitches. Demand therefore cannot only be measured by a specific local authority PPS but needs to take account of neighbouring authorities.

- 8) How will the transition between existing and new facilities be controlled and managed? **[NOT YET PLANNED]**

As far as we are aware there is no plan for transitional arrangements. The PJA Report strongly recommends that the council undertake a full detailed feasibility and design work before finalising any layouts and this will include access, parking and clubhouse facilities. It also advised the council to consult with external user groups when undertaking the detailed feasibility and design work. None of this has happened and in the absence of any capital costs or planned future management arrangements there is no evidence to suggest that local consultation or planning has been undertaken.

- 9) As Hainault Recreation Ground is within an area safeguarded for mineral extraction does it provide a suitable, long-term alternative to Oakfield? **[NO]**

The London Borough of Redbridge commissioned a report by Savills which reported last year that gravel extracts amounted to 3.3 million metric tonnes. The Council need to meet the GLA targets for mineral extraction and the 30 year extractions on the south side of Forest Road will most probably come to an end during the lifetime of the 2015-2030 Local



Plan. The sports grounds along the north side of Forest Road should not therefore be considered appropriate for the relocation of sports from the Oakfield site.

10) What will be the impact of the development at Oakfield in terms of traffic and air pollution? **[BAD]**

Oakfield Playing Fields is considered to provide the best amateur sports pitches in the borough. They provide a home for a number of local clubs that have been extremely successful in the number and range of teams they support. The current usage levels reflect decades of hard work on the part of hundreds of volunteers who have dedicated their lives to making the site a special place to play sport.

In short Oakfield Playing Fields is a magnificent resource that improves the lives of many Redbridge residents so it is unbelievable that Redbridge Council, which exists to meet the needs of local people, is even considering this proposal. Once a playing field is lost, it is lost forever and so it would be with Oakfield Playing Fields if this recommendation comes to fruition. Redbridge council should reconsider the Oakfield proposals based on the following:

- the environmental impact of additional traffic flows.
- Pollution levels twice the EU recommended standards.
- Poor quality information on potential sites where Old Parkonians and the other resident clubs could be relocated.
- Whilst recognising the need for additional housing, the need is predicated on population trends which may not be accurate and are open to interpretation.
- The Council has not followed National Policy Planning Framework, Sport England policy or adopted best practice in their approach to local consultation.
- Population density in London Borough of Redbridge is 50 people per hectare which compares unfavourably with other adjacent boroughs where it is 39 people per hectare.

11) To what extent is Oakfield in a sustainable location? **[IT'S BEEN SUCH SINCE 1930s. GB POLICY PROTECTS LONG TERM]**

Oakfield forms part of Fairlop Plain which was laid out by Crown Commissioners after the clearance of forest in 1851. After the war when it had been used as an airfield, most of it was purchased by Ilford Council from the LCC as green belt. But the 40 acres of Oakfield continued to be used by the ILEA as a sports ground for London school children. This is protected by a Restrictive Crown Covenant dating from the 1930s that stipulates it must be confined to recreation and sport.

It is a large and thriving sports ground, with very convenient access by road, bus and rail, used by hundreds of people every week of the year. It comprises the indoor Redbridge Sports and Leisure Club complex (Charitable Trust) which is a multi-million pound indoor sports and leisure centre that benefited from London Olympic funding with the provision of additional Olympic practice facilities. The Council are not replacing these facilities and have given the charity freehold ownership in return for some of the outfields.

The rest of the site consists of outdoor grass football and cricket facilities run by Old / Oakfield Parkonians (OPA), the Hainault & Clayhall CC (associated with Frenford Youth clubs) and Bealonians football club. These clubs have shared access via two entrances and



matters of mutual interest are managed through the Oakfield Users Group (RSC/OPA and Frenford).

The outdoor facilities boast 12 adults and 7 youth football pitches and 4 cricket squares – all of a high quality and intensively used. There are two large, fully furnished multi-purpose pavilions which are used extensively for community activity as well as their obvious sports purpose. The clubs are culturally diverse bearing witness to the demography of the Borough.

As a vibrant sport and recreation hub serving the local community for over 85 years, Oakfield has demonstrated it is highly accessible, supports community needs through sustained community cohesion, health and well-being and is therefore in a sustainable location.

- 12) How would the development of Oakfield promote sustainable patterns of development? **[IT WOULD NOT – IT WOULD BE URBAN SPRAWL, COMBINE BARKINGSIDE WITH HAINAULT AND UNSUSTAINABLE]**

The removal of Green Belt designation would promote urban sprawl and would contribute to a merging of Barkingside with Hainault.

- 13) What implications do the designation of the site as an asset of community value and the existence of a covenant have on the allocation and delivery of Oakfield? **[THESE ARE INTENDED OBSTACLES TO DEVELOPMENT]**

Both are protective measures designed to safeguard the site in perpetuity for the expressed purpose of the provision of sport and recreation opportunities for the local community. The strength of local opposition to the council with a parliamentary petition of over 5,000 signatures reflects local anger to the Council proposals. Even the Mayor of London Sadiq Khan expressed a view in his policy statement on Protecting and enhancing our natural environment including:

- Opposing building on the Green Belt, which is even more important today than it was when it was created.
- Strengthening protections for open spaces within the London Plan, including playing fields, Metropolitan Open Land, and our Sites of Importance for Local Nature Conservation and nature reserves.

'It is on these green spaces that our city's biodiversity and wildlife is most concentrated, our children play and learn about nature, and where we Londoners go to relax. With huge pressures on land for housing and other uses, it is essential that we maintain these spaces, and even expand upon them '

