

London Borough of Redbridge Local Plan 2015-2030

Sport England Hearing Statement

Introduction

1. Sport England has raised an objection to the Local Plan on the grounds that it proposes the loss of playing fields to development. The Local Plan and its supporting evidence do not adequately demonstrate that replacement playing fields can be provided in line with the requirements of national policy.
2. The comments contained in Sport England's original representations to the Local Plan and this statement cross over a number of issues for examination which focus on the soundness of the plan, specific proposals and whether its approach is justified and consistent with national policy. These include issues 2, 3, 4, 4a, 5 and 11. However, Sport England's objection relates to matters predominately addressed in Issue 4a. If these matters are adequately resolved then so will Sport England's wider concerns relating to the other issues to be considered by the Inspector.

Issue 4a: Are the policies for the individual Investment and Growth Area justified, consistent with national policy and will they be effective (Policies LP1A- LP1E)? Are the strategic and key sites within each of the Investment and Growth Areas 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 sites adequate in respect of use, form, scale, access and quantum of development?

3. The proposed loss of both Oakfield Playing Field and Ford Sports Ground appeared in the 2013 Core Strategy Review and Preferred Options Report Extension: Alternative Development Strategies document which was published in November 2014. At this point, The London Borough of Redbridge did not have a robust and up-to date adopted Playing Pitch Strategy (PPS), and the Council had not started work on the current PPS. As such, the Council had no basis to weigh the importance of the respective allocations to sport relative to the other matters it took into account in evaluating the suitability of sites. Since then, it has become clear through the Alternative Playing Pitch Sites Assessment, Institute of Groundmanship (IOG) reports and the only document in the evidence base relating to sport that Sport England considers robust, the PPS, that there are no deliverable sites that could come forward as suitable replacements for both Ford Sports Ground and Oakfield Playing Field that will provide equivalent quantity and quality in a suitable location when compared to the playing field sites that the Council are intending to lose.

Crossrail Corridor – Policy LP1B

4. Sport England's objection letter to the pre-submission Local Plan identified that the Crossrail Corridor includes designating Ford Sports Ground as a Development Opportunity Site where a housing led mix use scheme would come forward. This designation would result in the loss of existing playing fields. The modifications indicated by the Council in its Schedule of Modifications document changed the wording to part of this policy to now read "*In accordance with the NPPF, the loss of playing fields resulting from proposed development will be replaced by equivalent or better provision in terms of quality and quantity in a suitable location. Supporting facilities will also be re-provided*" This change essentially matches the wording set out in paragraph 74 of the NPPF. However, the Council have failed to adequately demonstrate that the playing fields, which are of great importance in the area, can be replaced by at least equivalent provision in terms of quantity and quality in a suitable location. The designation proposing the loss of existing playing fields is therefore not justified or deliverable.

5. The Council have commissioned a *Pitch Relocation and Improvement Feasibility Report* by the IOG. The Council cite the report as an evidence base document and it suggests the existing playing pitches at Ford Sports Ground can be re-provided at Goodmayes Park Extension. Sport England have already advised the Council that it does not consider the report to be robust as it does not fully consider the strategic context of playing field provision in the Borough. It is unfortunate that the study was not developed in co-operation with the National Sport Governing Bodies (NGBs) and Sport England who were merely asked to comment on the report once the draft was completed. The concerns raised by Sport England, and by the NGBs, based on their expertise and knowledge of how sports are played in the Borough appear to have been dismissed. Notwithstanding the shortcomings of the report, the Council still assert that Ford Sports Ground can be replaced. However, the report focuses on intensifying the use of an existing playing field by providing, what the report considers, replacement playing pitches. The options put forward in the report would not provide any new replacement playing field land. It would result in a net loss of playing field land and therefore not equate to providing replacement provision as required by paragraph 74 of the NPPF. Playing fields also have a range of functions, in addition to accommodating playing pitches, which make them a vital resource for the existing and future communities and key to delivering the Government's objectives of improving the nation's health. This is clear from the Government's Sports Strategy, *Sport Future: A New Strategy for an Active Nation*, which seeks the protection of playing field land. This key community resource would be lost without the adequate justification or replacement provision as required by national planning policy.

6. Although the IOG report states that Goodmayes Park Extension is currently redundant for organised sports use it has been used for formal sport in the past. Its current limited use for formal sport does not mean that it is not needed now or in the future as clearly demonstrated by the Council's adopted PPS (see paragraph 6 below). The IOG report itself indicates that the site is used on an 'ad-hoc' basis which indicates that Goodmayes Park Extension still plays a role in meeting the need for playing pitches and sport in the area. The site also appears to currently provide a function for accommodating demand for informal sport which may otherwise be played on playing pitches or would just be unmet.

7. The Council have adopted a PPS in June 2016 which was developed through a robust process. Sport England and the NGBs were engaged in this process and inputted into its development. By seeking to justify the loss of Ford Sports Ground through the options put forward in the IOG report, the Council appear to be ignoring the recommendations and Action Plan of its own adopted PPS. The PPS states that all playing field within the Borough should be protected and specifically includes Goodmayes Park Extension within this protection.
8. The PPS does, however, recognise that there is potential to reconfigure playing pitches using some of Ford Sports Ground current playing field, Seven Kings Park and educational land between Seven Kings Park and Ford Sports Ground. However the PPS is clear that this would have to be subject to an adequate feasibility study to ensure all pitch needs for the future could be accommodated. The IOG report does not consider all current and future playing pitch needs which is demonstrated by the lack of appreciation for the actions already proposed for Goodmayes Park Extension in the PPS. The PPS does look into the potential replacement of Ford Sports Ground to meet with paragraph 74 of the NPPF and specifies some potential sites. Whilst the PPS states that 'other appropriate sites' could be looked into Goodmayes Park Extension is not listed as a potential site. The PPS Action Plan identifies that Goodmayes Park Extension is needed to meet the need for pitches in the Borough including actions relating to Starch House Lane Playing Fields, to provide a home for a youth team/Shield Academy, to meet the projected requirements of playing pitches to 2020 and potentially for junior cricket. Having regard to these actions in the PPS, and that it is clearly a playing field that should be protected, Goodmayes Park Extension is not an 'appropriate site' to be considered as also providing replacement for the proposed loss of Ford Sports Ground.
9. The IOG report indicates that Ford Sports Ground's existing playing field provision can be marked out on Goodmayes Park Extension but that the layout is compact and the site is arguably less accessible than Ford Sports Ground. It also appears to only focus on re-providing the existing playing pitch provision that is currently marked out rather than the extent of the entire playing field land. It does not take into consideration the greater ability at Ford Sports Ground compared to at Goodmayes Park Extension to move playing pitches around to avoid wear and tear, or the greater potential to increase the capacity of the site in terms of the amount of play it could accommodate (e.g. through providing additional pitches and/or work to existing pitches). Furthermore, since the quality of the playing pitches at Ford Sports Ground has not been established, except through a high level visual assessment during the PPS process, the report cannot, with any accuracy, confirm that Goodmayes Park Extension can provide pitches of equivalent quality and therefore being able to accommodate the current and projected future play at the Ford Sports Ground site.
10. In putting forward the options for replacement pitches at Goodmayes Park Extension, the IOG report also makes a considerable assumption that the pitches would be maintained to a high standard so the maximum number of games

can be played. This assumption, however, does not appear to consider the reduced budget that the Council's leisure operator indicated was likely at a recent PPS meeting. Consequently, it is not clear that the Council could maintain the pitches to the high standard required by the report's recommended options. This raises questions whether the proposed options are deliverable to the level required to meet the current and future demand for the pitches at Ford Sports Ground.

11. In addition, the indicative costs provided in the report do not appear to include the cost of constructing, managing and maintaining necessary ancillary provision, for example changing rooms. In relation to Option 2, this should include a sinking fund to ensure the replacement of the Artificial Grass Pitch (AGP) surface at the end of its lifespan. Although indicative at this stage, the proposed cost for the AGP (£625,000) is below Sport England's indicative costs for a 3G pitch which is around £900,000. These additional costs again raise questions regarding deliverability of the proposed options.
12. In line with the recommendations in the Council's adopted PPS, the Local Plan now 'safeguards' a replacement site if Ford Sports Ground were to be lost through the inclusion of Map 2 in its modifications. However, the site safeguarded is Goodmayes Park Extension's existing playing field land. This is unsound as it proposes replacing an existing playing field with another existing playing field that has already been strategically identified in the adopted PPS, through a robust and collaborative process, as being needed to meet the London Borough of Redbridge's playing pitch needs. The safeguarding of Goodmayes Park Extension and the designation of the Ford Sports Ground within the Local Plan is therefore not based on a robust assessment of need, i.e. the adopted PPS, as required by paragraph 73 of the NPPF. In addition, despite the modifications to Policy LP1B now almost replicating paragraph 74 of the NPPF, the Council have failed to demonstrate that the replacement provision required by the policy could actually be delivered. Consequently, the designation of Ford Sports Ground as a Development Opportunity Site is unsound.

Barkingside – Policy LP1E

13. Similar to Policy LP1B, the Council have designated Oakfield Playing Field, an important playing field in the Borough, as a Development Opportunity Site. Again, the modifications to this policy replicate the wording of paragraph 74 of the NPPF. However, as with Ford Sports Ground, the Council have not been able to demonstrate that that Oakfield Playing Field can actually be replaced with a new playing field of equivalent quantity and quality in a suitable location.
14. The Council have again cited an IOG report in its evidence base which asserts that the playing pitches at Oakfield Playing Field can be replaced at Hainault Recreation Ground and Forest Road Playing Field. This report's methodology is broadly the same as the report produced for the proposed replacement of Ford Sports Ground. It also raises the same issues as detailed above, in particular intensification of existing playing field sites are proposed, there

is a focus on replacement playing pitches rather than playing field land, there has been lack of collaboration, the strategic context has not been comprehensively considered (including future playing field needs), there is limited room available to move playing pitches to limit wear and tear, there is a reliance on developing and maintaining high quality pitches, limited consideration of reduced budgets and the actual quality of the existing playing field has not been established. Since these matters have already been explained above in relation to Ford Sports Ground replacement feasibility report they will not be repeated here. It is clear though, again, that it is unsound for the Council to rely solely on this IOG report to justify that the Oakfield Playing Field can be replaced by intensifying the use at Hainault and Forest Road Recreation Grounds.

15. The PPS indicates that both these sites could be brought back into use to meet the Borough's playing pitch needs identified in the strategy. The Action Plan also indicates that these sites, as well as Oakfield Playing Field should be protected. It is acknowledged, however, that the Action Plan also suggests that the feasibility of using Hainault and Forest Road Recreation Ground could be explored. However, the IOG report does not consider the strategic need of both Hainault and Forest Road Recreation Ground identified in the PPS. Therefore, it is not clear if the relocation of the playing pitches from Oakfield Playing Field to the site would not have a detrimental impact on the playing pitch need in the Borough. It should be noted that replacement playing pitches are being considered and not playing field as specified in paragraph 74 of the NPPF. Playing fields have a range of functions, not just accommodating playing pitches. In addition, all the sites could accommodate more playing pitches than currently marked and for other sports if the future demand emerges.
16. In terms of quality, both Hainault and Forest Road Recreation grounds are in the flood plan and the IOG report indicates these could become very wet after adverse weather. As Oakfield Playing Field is considered by the PPS to be a high quality playing field the conditions at the proposed replacement sites raise questions whether an equivalent quality can be provided. It is also questionable whether the pitches proposed as replacement for Oakfield Playing Field and their resulting use can be accommodated alongside the other needs for these sites highlighted in the adopted PPS.
17. The Local Plan has been modified to 'safeguard' Hainault and Forest Road Recreation Grounds as replacements for the loss of Oakfield Playing Field, through the inclusion of Map 1. These are not a replacement sites as the proposals will result in an intensification of use of existing playing fields which has not fully considered the wider strategic context of playing pitch/playing field need in the London Borough of Redbridge. In addition, as noted by one of the Inspector's questions, Hainault Recreation Ground is within an area safeguarded for mineral extraction which would have an impact on this sites' ability to accommodate sport throughout the plan period and longer. The Local Plan is, therefore, unsound as it is not in accordance with paragraphs 73 and 74 of the NPPF which require planning polices to be based on robust assessments of need and that replacement playing field is provided for any playing field loss in

areas, such as Redbridge, where a surplus of playing field land has not been identified. So, again, despite modifying Policy LP1E to essentially replicate paragraph 74 of the NPPF, the Council have failed to demonstrate that this could actually be delivered. Consequently the designation of Oakfield Playing Field as a Development Opportunity Site is unsound.

Matter relating to both Policies LP1B and LP1E

18. In addition to the points above, the modifications to both policies do not indicate when any replacement would be provided. To ensure continuity, if the Council can find sites that are not existing playing field and are deliverable as replacements in the plan period it must be made clear in the policies, as it is in Policy LP35, that the replacement playing field should be in use before any loss of Oakfield Playing Field or Ford Sports Ground. This is especially important given that there is no surplus of playing field identified in the PPS.

Conclusion

19. Both Oakfield Playing Field and Ford Sports Ground have been identified as important sites to deliver sport for the Borough and beyond and therefore any policy or decision that advocates their loss should be based on robust assessments of need and indicate sites where these sites can be replaced as stated in paragraphs 73 and 74 of the NPPF. The Council have failed to do this. Whilst Local Plan Policies LP1B, LP1E and LP35 state that replacement sites should be provided of at least equivalent quantity, quality and accessibility, they have failed to demonstrate that this would be deliverable and are proposing to intensify the use of existing sites which have already been identified through a robust assessment (the Council's own adopted PPS) should be protected and meet other playing pitch need. The designation of these two playing fields as Opportunity Sites is therefore not justified and undeliverable and therefore Sport England considers these policies to be unsound.
20. Sport England considers that in order for these policies, and therefore the Local Plan, to be sound then both Oakfield Playing Field and Ford Sports Ground are omitted from the designations and protected by policy.

