

## **CED011 Council's Response to Issue 4a (Barkingside – Policy 1E)**

### **Issue 4a (Barkingside – Policy 1E)**

- i) Is the strategic site at Oakfield, Forest Road (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)?**

#### Consideration against other reasonable alternatives

- 1.1 Oakfield is considered justified when compared to other reasonable alternatives. A range of growth options have been tested through the Sustainability Appraisal process. In 2016, the Local Plan Sustainability Appraisal (LBR1.11) tested a total of 12 options for growth, including several that excluded any development of Oakfield. These options can be seen in table 6.2 and 6.3 of LBR1.11. This appraisal highlighted the pros and cons of each option, and as such informed and supports the Council's preferred strategy. As set out in paragraph 8.2.3 of LBR1.11, particular considerations included that:
- A lower growth option involving nil growth at Oakfield would compromise the achievement of important housing delivery objectives without leading to a plan that performs notably better in terms of other strategic objectives (recognising the merits of this site, and the potential to address issues at the site through policy and committed plan implementation).
  - A higher growth approach would help to meet objectively assessed housing needs more fully, but would compromise achievement of other important objectives (e.g. higher density development would lead to challenges from a community infrastructure delivery perspective).
- 1.2 In response to representations received on the Pre-Submission Plan, most notably from the Mayor, stating further consideration of town centre intensification was needed before Green Belt release, further reasonable alternatives were assessed in the Local Plan Sustainability Appraisal Interim Report 2017 (LBR1.11.2). As set out in table 2.4 of document LBR1.11.2, this tested various combinations of urban densification and Green Belt release, which included one option of no Green Belt release. The findings of this appraisal, as set out on page 33, are that this option performs poorly against the Sustainability Appraisal Framework on a number of matters, including as a result of a shortfall in secondary school

provision, and lower levels of growth to meet housing needs and support economic growth. Furthermore higher urban densification was identified as having negative implications for townscape and character.

- 1.3 In addition, individual Green Belt parcels, including Oakfield, were assessed against the Sustainability Appraisal Framework in document LBR1.11.2. This appraisal found Oakfield to perform better against the Sustainability Appraisal Framework than several other Green Belt sites put forward by developers, on account of:
- excellent access to Barkingside District Centre, Fairlop Underground Station, leisure facilities, and open space at Fairlop Country Park;
  - proposed delivery of a new secondary school, health facility and community hub on site, and;
  - potential to enhance Redbridge Sports Centre.

#### Deliverability regarding constraints and national policy

- 1.4 Oakfield is considered deliverable within the plan period having regard to constraints and national policy.
- 1.5 The main constraints covering the site are:
- the presence of existing pitches;
  - the sites designation as an Asset of Community Value (ACV),
  - the presence of Crown Covenants on the land; and
  - its existing Green Belt designation.
- 1.6 As set out in response to questions (iv) and (v) below, existing pitches can be re-provided to a suitable location within the borough, prior to any development. This will ensure consistency with NPPF requirements, and feasibility work that identifies potential re-provision sites has been carried out. As the site is identified for development in the final phase of the plan, this constraint can be overcome within the plan period.
- 1.7 Neither the ACV designation, nor the Crown Covenants are considered to undermine site delivery within the plan period, for the reasons set out in response to question (xiii) below.
- 1.8 Regarding the Green Belt designation, the Local Plan seeks to remove this designation on the basis of:
- the borough having exceptional circumstances for amending Green Belt boundaries; i.e. its development needs and lack of developable land
  - the site not meeting any NPPF Green Belt purposes; as set out in the Green Belt Addendum (LBR2.41.1); and

- the need to promote sustainable patterns of development when reviewing Green Belt boundaries; as set out in paragraph 84 of the NPPF.

1.9 On this basis, the Council’s proposals for the site are consistent with national policy.

Detail in site allocation

1.10 Detail about the site allocation is considered adequate for Local Plan purposes. Details provided in the Oakfield policy box under policy LP1E, and Revised Appendix 1 – Development Opportunity Sites (LBR2.06.1), set out requirements for approximately 600 new homes, a new school, and open space. This is further supplemented by the Concept Masterplans Green Belt Release Sites (LBR2.78) which sets out:

- broad locations for the different uses anticipated on site, including identifying areas for residential development, new education and potential health uses, and open space;
- access points, both in terms of primary vehicular access, and pedestrian access points and links that will improve site permeability;
- indicative guidance on building form with reference to a mix of housing and flats, and buildings of 2-5 storeys to respect local character;
- guidance on development quantum – both in terms of residential and social infrastructure requirements.

1.11 The concept masterplan demonstrates that the anticipated number of dwellings (i.e. around 600) can feasibly be delivered on site, alongside other requirements such as on-site social infrastructure, open space, a retained leisure centre, and improved permeability though the site.

1.12 It is however noted that a further modification to policy LP1E and the Oakfield policy box is necessary for consistency across all elements of the plan regarding requirements for on-site social infrastructure. The following modifications are therefore suggested:

1.13 Amend 2<sup>nd</sup> infrastructure item under LP1E to read:  
 “New minimum 8 form entry ~~all through~~ secondary school at Oakfield”

1.14 Amend 4<sup>th</sup> bullet point of Oakfield policy box to read:  
 “Provision should be made for a new 8 forms of entry secondary school and a potential new health locality hub”

**ii) Does Oakfield meet any of the 5 purposes of the Green Belt in paragraph 80 of the NPPF?**

- 2.1 Through the preparation of the Local Plan, Oakfield has been subject to several Green Belt Assessments.
- 2.2 The initial assessment of Oakfield was carried out in 2010 as part of an assessment of the wider Fairlop Plain (GB14). This assessment was against PPG2 criteria and the results are presented in Appendix 1 of the Green Belt Review 2016 (LBR2.41). Whilst this found that the wider parcel of Fairlop Plain meets Green Belt purposes, it did recommend that Oakfield be sub-divided from the site.
- 2.3 Further assessment of Oakfield against NPPF purposes was carried out in September 2015, and presented in the Green Belt Review 2016 (LBR2.41). As set out in paragraph 3.15.2 of that document, this found that the site does not meet any NPPF purposes.
- 2.4 Both the 2010 and 2016 reviews placed some emphasis on local interpretations of Green Belt Policy. In light of known criticism of such an approach when carried out by other local authorities, and representations received on the Pre-Submission Plan, a Green Belt Assessment Addendum was produced in 2017 (document LBR2.41.1). This clarifies how individual Green Belt parcels in Redbridge, including Oakfield, perform against the 5 NPPF Green Belt purposes, i.e. to:
- check the unrestricted sprawl of large built-up areas;
  - prevent neighbouring towns merging into one another;
  - assist in safeguarding the countryside from encroachment;
  - preserve the setting and special character of historic towns; and
  - assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.5 As set out in the Green Belt Addendum (LBR2.41.1), Oakfield meets none of these purposes. Paragraph 3.14.7 of that document makes clear that:
- it does not check the unrestricted sprawl of large built up areas as it is surrounded by development to the north, west and south;
  - it does not prevent neighbouring towns merging, as surrounding development forms part of the Ilford/ Barkingside/ Grange Hill settlement, which merge into one another as a continuous urban area. Furthermore, the railway embankment and retained Green Belt to the east prevent those areas from merging with Hainault;

- it does not safeguard the countryside from encroachment, as the site solely comprises sports/playing fields with associated buildings and extensive car parking, and is not contiguous with wider countryside due to the presence of the railway embankment and prominent sports centre.

2.6 In addition, as set out in paragraph 2.2.12 – 2.2.15 of the Green Belt Addendum (LBR2.41.1), remaining Green Belt tests are not applicable to Oakfield as:

- there are no “historic towns” as applied to national Green Belt policy within the vicinity of the site; Oakfield does not therefore preserve the setting and special character of historic towns
- all brownfield sites with reasonable prospects of development have been allocated in the Local Plan; so any development of the site would not undermine regeneration efforts.

**iii) Has there been any material change in circumstances since the original designation of the Green Belt?**

3.1 Yes. Current levels of population growth represent a material change in circumstances from when London’s Green Belt was first designated in 1955 and expanded through the 1950s and 1960s.

3.2 When the Green Belt was first designated, London’s population was in steady decline from its previous 1939 peak – a trend to that continued until the early 1990s (Population Growth in London, 1939-2015, GLA). There was therefore less pressure to provide land within London to meet its housing and development needs.

3.3 Since the 1990s, London’s population has continued to rapidly grow. Based on latest population projections, the North East London SHMA (LBR2.01) and SHMA update (CED003) identify far higher levels of housing need in Redbridge than has historically been the case; and almost double the minimum requirements set out in the London Plan. This, combined with the resultant need for supporting infrastructure, represents a material change in circumstances from when the Green Belt was first designated.

3.4 Through the preparation of the Local Plan, the Council has considered all brownfield sites with reasonable prospects of development, and concluded that it is not possible to meet its development needs in a sustainable manner without encroaching onto the Green Belt.

**iv) 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?**

4.1 The Council has already made significant investment in order to address paragraph 74 of the NPPF. The Frenford Club, current leaseholders of the Jack Carter Pavilion and related sports pitches at Oakfield, have been re-provided at the former Port of London Authority Sports Ground, the Drive, Ilford. The Council has invested approximately £6.25 million in re-providing sports provision to an equivalent or better standard at this site. The investment provided a new 'sports pavilion' which included four badminton court size sports hall, new changing rooms for outdoor and indoor sports, fitness suite, dance studio and club rooms together with car parking for approximately eighty cars. In terms of playing pitches, two cricket squares have been provided. In regards to football three adult pitches and two 3G 5 v 5 facilities have been provided. The re-provided 'sports pavilion' is a improvement when compared to the existing Jack Carter Pavilion currently located at Oakfield.

4.2 Notwithstanding the above, the Council has identified the potential to re-provide the existing level of sports provision (including facilities and pitches at the Jack Carter Pavilion) currently located on Oakfield to underused land at the Hainault and Forest Road Recreation Grounds. Proposals set out in Pitch Relocation and Improvement Feasibility Report (LBR 2.22.1) set out a range of options to demonstrate how the existing sports provision and facilities at Oakfield could be replaced by equivalent or better provision in terms of quantity and quality at Hainault and Forest Road Recreation Grounds. This document sets out the works required to reinstate the provision currently at the Oakfield along with the likely works required to ensure such facilities can be sustainably managed at the same quality level the pitches currently meet. Pitch sizes are proposed to meet FA, ECB and Sport England guidelines as are pitch orientations where possible (note the current football pitch layout at Hainault Recreation Ground is not compliant with recommended orientation and this has been improved on where possible and logical).

4.3 Pitch Relocation and Improvement Feasibility Report (LBR 2.22.1) demonstrates that the reprovision of equivalent and better replacement of pitches and facilities can be delivered at Hainault and Forest Road Recreation Grounds. The report sets out three potential options, each with their benefits to different users. Table 3 on (page 17) sets out the potential pitch provision each option could provide. In terms of football, Option 1 accommodates current football provision at Hainault, and the Oakfield sites with the addition of 2 new 11 x 11 (U14's) pitches, 1 new 9

x 9 pitch, 4 new 7 x 7 pitches and 8 new 5 x 5 pitches with scope for some limited additional intensification. Option 2 accommodates current football provision at Hainault and the Oakfield sites with the exception of 1 adult pitch which has been altered to provide more smaller pitches. Specifically, 1 new 11 x 11 pitch, 3 new 9 x 9 pitches, 5 new 7 x 7 pitches and 9 new 5 x 5 pitches. This demonstrates how proposals could respond to increased demand for youth pitches. Option 3 accommodates current football provision at Hainault and the Oakfield sites with the exception of 1 adult pitch which has been altered to provide more smaller pitches. Specifically, 1 new 11 x 11 pitch, 1 new 9 x 9 pitch, 5 new 7 x 7 pitches and 8 new 5 x 5 pitches. Again, this demonstrates how proposals could respond to increase demand for youth pitches. In all cases the maximum number of games of adult football that can be played in the three options presented is higher than the current maximum provision at Oakfield, by between 52 and 54 additional games per week, due mainly to the addition of two 3-G pitches. Though Options 2 and 3 reduce the total number of simultaneous adult games by 1 from the current maximum, the additional game can be scheduled onto one of the 3-G pitches but would start either earlier or later than the other games.

- 4.4 In relation to cricket, table 4 (page 21) sets out the maximum number of squares that can be used simultaneously which would meet legal boundaries. All options result in losing some cricket squares which would affect the ability of the site to support the same amount of simultaneous play as is currently the case, but only if safety concerns at current layout of Hainault Recreation Ground are ignored. If legal boundaries are required at Hainault Recreation Ground as currently configured along with no shared boundaries to reduce safety issues then the same level of current safe simultaneous play can be maintained. However, by increasing pitch numbers and improving the quality of pitches (particularly those currently located at Hainault Recreation ground), the total number of games possible increases beyond that which is currently used across both sites. It is also noted that in options 2 and 3, the provision of 6/7 additional cricket NTP's respectively will add further capacity to support informal cricket, midweek cricket and single wicket competitions on the site which has not been quantified in this report.
- 4.5 In addition, provision for rugby, within the 3G pitches, increases the potential users of the site compared to those at Oakfield. Finally, one option contains proposals for a stadia pitch which could potentially provide a regional draw.
- 4.6 The works proposed in paragraphs 6.3 – 6.5.4 would enable equivalent or better quality of pitches to be re-provided as is currently located on the Oakfield site.

- 4.7 Proposals include the provision of two new sports pavilions/changing facilities and car parking, replacing those already located on Oakfield (Old Parkionians and Jack Carter Pavilion). Proposals would also make a significant improvement to the existing provision on Hainault Recreation ground, not only in terms improving existing pitches on the site, but also providing two new modern 'fit for purpose' pavilions/changing rooms, which will enable existing and future clubs located on these sites to operate in a more financially sustainable and efficient way (subject to potential lease/licence/rental arrangements).
- 4.8 The Hainault Recreation Ground and Forest Road site is considered to be a suitable location as it is in close proximity to the existing Oakfield Site (1.3 km – 1.6 km – 10 - 20 minute walk) meaning minimal disruption from users displaced from the site. The site is still easily accessible from both Hainault and Fairlop Stations and is connected to other bus services from Barkingside and Romford. The site would be deliverable as it is in Council ownership and management.
- 4.9 It should also be noted that within the Green Belt Conceptual Masterplan (LBR2.78) provision has been included on the site for open space/sports pitches. With regards to the Oakfield there is sufficient space to retain one cricket pitch and two adult football pitches as part of the development proposed. This is likely to be related to the proposed education use on the site. This sports provision will be subject to a community use agreement which will ensure local residents can use and access the facilities.
- 4.10 The Oakfield site has been phased for the final part of the Local Plan (2025 – 2030) to enable firm proposals to be developed and enable sufficient time for a coordinated relocation. The overall gain from the investment in the sports provision at the former PLA site to relocate the Frentford Club and re-provide sports provision from the Jack Carter Pavilion, together with the proposals set out in LBR 2.22.1 and the retention of sports provision at the existing Oakfield site as set in LBR 2.78 demonstrate the Council's commitment to meeting the requirements of NPPF paragraph 74. The grampian terms of policies LP1 E - Oakfield and LP35 - Protecting and Enhancing Open Space ensure the requirement to re-provide equivalent or better sports provision is imbedded within the Local Plan and that development of Oakfield should not happen until this has been done. Also note Modification 1.02 (part 1) - Map 1 – Safeguarding for potential re-provision of sports.

**v) 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?**

- 5.1 The reasons for not carrying out a quality assessment of existing pitches at Oakfield sites as part of the feasibility study are three-fold.
- 5.2 First, the pitches proposed for Hainault and Forest Road will be either newly constructed or heavily renovated. This means they will not have been played on prior to handover and thus the only valid comparison with the existing pitches at Oakfield would be when the pitches at Oakfield are in the best condition possible which would be shortly before, or at the commencement of, the playing season. For the cricket squares this would be April and for the football pitches this would be early August. As the site visit was not carried out until late October, gathering playing quality data for the pitches at Oakfield would have not allowed for a useful comparison to be made later on with new pitches at Hainault and Forest Road. This was noted briefly in the report with the comment made that should the development go ahead the quality of the pitches at Oakfield should be measured at the pre-season periods when quality is likely to be highest.
- 5.3 Second, to enable rough estimates of the works likely to be required to ensure equivalent or better quality for the replacement pitches, the qualitative assessments of the pitches at Oakfield stated in the Playing Pitch Strategy (PPS) as being good was used as a guide. Furthermore the works suggested for the new pitches to be constructed at Hainault and Forest Road has assumed a high quality level using the Institute of Groundsmanship Performance Quality Standards which is a level just below elite or professional and is likely to be equivalent or better than a good quality classification as stated in the PPS. Indeed, the construction approaches suggested would allow the construction of elite level cricket squares and football pitches if required, though maintenance to handover would need to reflect this if such a level was required.
- 5.4 Finally, the soils and the underlying parent materials of Oakfield and both Hainault and Forest Road are the same, thus there is no fundamental structural reason why equivalent quality cannot be achieved at handover, especially given the works recommended.
- 5.5 Pitch Relocation and Improvement Feasibility Report (LBR 2.22.1), page 1, section 1.0, paragraph 4, should be noted.

**vi) How will the cost of re-provision and future maintenance be funded?**

- 6.1 As freeholders of Oakfield and Hainault and Forest Road Recreation Grounds, the Council has a great deal of direct control on the mechanism and timing for the re-provision of the sports pitches at Oakfield. As with other sites, the costs of re-providing the existing facilities will ultimately be borne as a development cost arising from bringing the site forward with the timing linked to its redevelopment. However, unlike those sites which are not owned by the Council, the Council will be able to directly build this principle into the commercial arrangements through which the site is ultimately redeveloped as well as through the planning process.
- 6.2 The Local Plan Viability Study (CED 111) paragraph 4.26 included an indicative cost for the re-provision of pitches and facilities. In general terms this additional cost did not compromise the viability or delivery of Oakfield.
- 6.3 There are a range of options available to the Council to ultimately bring the site forward including a straight disposal, joint venture or direct delivery. Whilst no decisions have yet been taken on any possible development route, there is no reason to consider that the re-provision of the existing facilities could not be secured in all circumstances.
- 6.4 The liability for any future maintenance costs would depend on the ultimate ownership of the playing pitches and any leasing or license arrangements put in place. There is the potential for the Council to consider leasing or licensing the pitches to sports clubs who would then take on responsibility for their management and maintenance. It is considered that these are matters of detailed management which are capable of being resolved through development management processes.

**vii) In sporting and recreational terms is it justified to replace an existing, established facility with a new one? Has sufficient account been given to youth provision and the needs of adjoining Boroughs?**

- 7.1 As noted in question iv above, as set out in LBR 2.22.1, there is the potential to re-provide sports provision existing at Oakfield with equivalent or better provision at Hainault and Forest Road Recreation Grounds, as required by the national policy. Hainault Recreation ground and Forest Road are essentially two separate sites which adjoin one another, with a partial hedge to separate them. Both have separate access points.

- 7.2 Whilst some formal sports use currently exists on Hainault Recreation ground – for both football and cricket - this is substantially underutilised. In terms of football only 8 adult pitches (no youth pitches) of a potential 12 have been marked out (16/17 season). In terms of cricket of the 10 squares located on the site, table 8 of LBR 2.22.1 sets out the demand for cricket at Hainault Recreation Ground. It shows a clear decline in demand to 2016 when only 5 squares on Saturdays and 6 squares on Sundays (a total of 193 games out of a maximum of 272 games) were played.
- 7.3 In relation to the Forest Road site, no formal sports provision whatsoever exists on the site. No football or cricket pitches (adult or youth) are marked out on the site (16/17 season). There are no recent records of cricket being played on the site and football was last formally played in 14/15 season, with just two pitches hired on a Sunday.
- 7.4 Given the above, the Council do not consider it correct to categorise the plan as seeking to replace an existing sports facility with another one, but rather the plan is relocating sports provision to alternative sites which are underutilised (in the case of Hainault Recreation Ground) or not currently in use for sport or recreation purposes (in the case of Forest Road), and where equivalent or better sports provision can be provided. The Council considers that the relocation of sports provision from Oakfield to Hainault and Forest Road Recreation Ground will enable a more efficient and effective use of land for sport and recreation purposes. Proposals would make a significant improvement to the existing provision, not only in terms improving existing pitches on the site, but also providing two new modern 'fit for purpose' pavilions/changing rooms, which will enable existing or future clubs located on these sites to operate in a more financially sustainable and efficient way (subject to lease/licence/retail agreement). In addition the re-provision of sports provision to this site is consistent with NPPF paragraph 81 which states, "once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation...".
- 7.5 As noted in question iv above, all options set out in LBR 2.22.1 provide additional youth provision on that which is currently provided at Oakfield. In term of football, option 1 provides for the addition of 2 new 11 x 11 (U14's) pitches, 1 new 9 x 9 pitch, 4 new 7 x 7 pitches and 8 new 5 x 5 pitches with scope for some limited additional intensification. Option 2 provides, 1 new 11 x 11 pitch, 3 new 9 x 9 pitches, 5 new 7 x 7 pitches and 9 new 5 x 5 pitches. Option 3 provides 1 new 11 x 11 pitch, 1 new 9 x 9 pitch, 5 new 7 x 7 pitches and 8 new 5 x 5 pitches. In relation to cricket it is also noted that in options 2 and 3, the provision of 6/7

additional NTP's respectively will add further capacity to support youth cricket in terms of informal cricket, midweek cricket and single wicket competitions on the site. In addition, provision for rugby, increases the potential users of the site and could accommodate youth rugby provision. It should also be noted that proposals include two new pavilions/changing rooms and will not be reusing the existing changing block currently on the site.

- 7.6 In relation to the needs of adjoining boroughs, during Duty to Cooperate discussions no adjoining borough has raised any issues over unmet need, either quantitatively or qualitatively, with regards to sports provision within their respective boroughs. The proposals in LBR 2.22.1 demonstrate how equivalent or better provision could be reprovided at Hainault and Forest Road Recreation Grounds in terms of quality and quantity. Paragraph 7.5 above notes how these proposals also include increase for youth provision which could contribute to wider need. The close proximity of Hainault and Forest Road Recreation Grounds to the existing Oakfield site (and existing public transport links) is unlikely to deter any teams, based outside of the borough, that may use existing Oakfield site from being transferred and continuing to use new facilities at Hainault and Forest Road Recreation Grounds.

**viii) How will the transition between existing and new facilities be controlled and managed?**

- 8.1 The transition between the facilities would be managed through the planning process with a phasing plan likely to be specifically conditioned which would need to demonstrate that the new facilities were at the required standard and available for use prior to the loss of the existing facilities.
- 8.2 There is also the potential for the Council to consider leasing or licensing the pitches to sports clubs who would then take on responsibility for their management and maintenance.
- 8.3 The Council currently owns and manages both Hainault and Forest Road Recreation Grounds which will facilitate transition and delivery.

**ix) As Hainault Recreation Ground is within an area safeguarded for mineral extraction does it provide a suitable, long-term alternative to Oakfield?**

- 9.1 Hainault Recreation Ground does provide a suitable long-term alternative to Oakfield. As set out in Council responses to Inspector's Questions iv), v), vi), vii) and viii), for Issue 4a: Barkingside – Policy 1E, the Council

considers that it is feasible to re-provide the existing sports provision that is currently located at Oakfield to Hainault and Forest Road Recreation Ground.

9.2 Within the adopted Minerals Local Plan 2012 (CED 103), Minerals Search Area (MSA) C includes, as part of a much wider area, both Hainault Recreation Ground (Site 9) and Forest Road Recreation Ground (Site 10). When considering development within an area designated as Minerals Safeguarded Land, policy M4 - Prior Extraction applies. It states that, "on Minerals Safeguarded Land (MSL) the Council seeks the extraction of the mineral deposit, prior to other types of development taking place." However, "where minerals have not been extracted, the Council will refuse planning permission for other uses unless:

1. The use is on a strictly temporary basis that is unlikely to delay the practical commencement of extractive operations, or
2. Where alternative sites are not feasible the developer has demonstrated either:
  - That the MSL does not contain a commercially viable minerals resource, or
  - The overriding community need for the proposed development on that site outweighs the need for the mineral resource."

9.3 Minerals have not previously been extracted from either Hainault or Forest Road Recreation Grounds. The Council also considers that there are no other alternative sites which could accommodate the level and quality of sports re-provision that exists at Oakfield in a 'suitable' location that would meet the requirements of paragraph 74 of the NPPF.

9.4 Minerals Report (Land at Forest Road) (LBR 2.66) is a desk-top study which sought to give an estimate of the potential level of minerals located within MSA C. It estimated that MSA C could contain a resource of between 2 and 3 million tonnes of potentially exploitable sand and gravel. It should be noted that this estimate is based on the potential mineral resources across all of MSA site C. It is considered that for MSA C to be commercially viable it would all need to be extracted. Partial extraction of just Hainault Recreation Ground and or Forest Road Recreation Ground would not yield sufficient tonnage for minerals operations to be commercially viable. Fullwell Cross Allotments and Forest Farm Cottages (Site 7) and Hainault Sports Ground and Pavilion Playing Fields (Site 8)

would also need to be extracted. In addition, it is considered that the commercial viability of minerals extraction is further undermined by the costs required to relocate the existing uses within MSA C prior to extraction in order to enable operations to take place, and their re-provision after extraction in order to restore the site and encourage after use, in line with Minerals Plan Policy M9: 'Priorities for Restoration and After-Use'. Existing uses in MSA C include active allotments, recreational facilities, sports playing fields and pavilions, and a traveller's site.

- 9.5 Paragraph 5.4.4 of the Minerals Local Plan is clear that, "safeguarding minerals is just one of a number of priorities in the overall LDF (Local Plan) land use strategy and sometimes a balance needs to be struck between competing priorities". It goes further by stating, "...there may be circumstances where reserves are present, but an alternative land use is proposed for which there is even greater community need." Examples of such uses include housing and schools. The Council therefore considers that the re-provision of sports provision from Oakfield to Hainault and Forest Road Recreation Ground, would amount to an overwhelming community need, outweighing the need for the mineral resource, as it would enable the development of the Oakfield site which includes proposals for housing, education provision, health provision and open space and sports provision. The proposed re-provision of sport provision from Oakfield to Hainault and Forest Road recreation ground would therefore be in accordance with Minerals Local Plan Policy M4, part 2, bullet point 2.

**x) What will be the impact of the development at Oakfield in terms of traffic and air pollution?**

- 10.1 The likely impact of development at Oakfield on traffic has been assessed through the Oakfield and Goodmayes High Level Transport Study (LBR2.52.2), which looked at the potential impact on the local road network of a range of development scenarios.
- 10.2 Inevitably, the development of the site will result in some increased vehicular movements. That in itself does not however override the need for new development in the borough to address population growth. Furthermore, as DfT guidance referred to in document LBR2.52.2 states that a ratio of traffic flow to capacity of below 0.85 demonstrates spare capacity, all link roads assessed in the vicinity of the site in have been identified to have some capacity during both the AM and PM peaks. This is demonstrated in table 2.5 of document LBR2.52.2.

- 10.3 Having assessed the impact of background traffic growth, and various development scenarios for the site, tables 6.6-6.8 of document LBR2.52.2 demonstrate that Forest Road is the only assessed link road likely to be pushed over its capacity at the end of the plan period. However, as set out on page 88 "potential development at the site cannot be said to be the main factor causing Forest Road to exceed theoretical capacity. Rather it is the predicted increase in background traffic flows for LBR between 2015 and 2030 that constitutes the largest increase." Furthermore, it is worth noting that the site is in a highly sustainable location, on the edge of Barkingside District Centre, and well served by Fairlop and Hainault tube stations and multiple bus routes. There are therefore excellent opportunities to encourage the use of public transport and local shops and services, thus reducing the need to travel by car.
- 10.4 Whilst the individual impact of development at Oakfield on traffic is likely to be such that some mitigation is required (as referred to below), it is not sufficient to preclude the development of the site. Further detailed modelling will be required at the planning application stage when precise details of the scheme are confirmed, in order to fully understand the traffic impact and inform mitigation measures, and Policy LP22 of the Local Plan provides the basis for requiring this. Given the sustainability credentials of the site, mitigation measures could include reduced levels of private parking, provision of car club spaces and generous cycle parking to minimise private car trips, and also measures such as junction improvements to improve traffic flows.
- 10.5 The impact of development at Oakfield on air pollution has been assessed through the High Level Transport Study Air Quality Report (LBR2.62). Tables 4.6 - 4.8 of that document set out that projected annual mean NO<sub>2</sub> concentrations, annual mean PM<sub>10</sub> concentrations, and number of exceedances of PM<sub>10</sub> 24 hour mean days, are all likely to be negligible. It therefore concluded (at page 33) that "the results of the assessment of the operational phase of the Development Sites indicate that there is not likely to be a significant adverse effect on local air quality at existing air quality sensitive receptors and that the introduction of new air quality sensitive receptors associated with the Development Sites in 2030 is unlikely to result in exposure to pollutant concentrations in excess of relevant AQS objective and EU limit value thresholds." Again, this demonstrates that air quality concerns are not sufficient to preclude development of the site.

**xi) To what extent is Oakfield in a sustainable location?**

- 11.1 Oakfield represents a sustainable location due its proximity to Barkingside District Centre, Fairlop and Hainault tube stations, and numerous bus routes.
- 11.2 Much of Barkingside District Centre is within a 1km walk or cycle from the site, offering easy access to residents for their day to day shopping needs such as groceries, plus a range of complimentary town centre uses such as banks, a post office, cafes and restaurants, a library, leisure centre, and medical facilities. In addition to the job opportunities provided in the service sector in the town centre, the two central line stations offer convenient access via public transport to job opportunities in Central London. Buses also provide regular links to other town centres undergoing significant growth and investment – Ilford and Romford (both designated as Metropolitan Centres in the London Plan), and Walthamstow (designated a Major Centre in the London Plan).
- 11.3 Taking into account NPPF paragraph 84 requirements that “when drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development”, the Local Plane Sustainability Appraisal 2017 (LBR1.11.2) appraised the site, along with other Green Belt sites, against the Sustainability Appraisal Framework. Summary appraisal findings were that the site performed well against this framework as it has “excellent access to Barkingside District Centre, Fairlop underground station, leisure facilities, and open space at Fairlop Country Park” and that it is “expected to deliver a new secondary school, health facility and community hub; and redevelopment offers the potential to improve and enhance Redbridge Sports Centre.”
- 11.4 The Local Plan Transport Evidence (LBR2.50) also assessed the site in terms of opportunities and constraints to travel to and from it in a sustainable manner, based on existing conditions. As shown in Table 6.37 of that document, the site received the highest scoring categorisation in terms of proximity to existing train services, existing bus networks, existing cycle networks, and access to the existing highways. In addition, it received a medium score in terms of PTAL, proximity to a local centre, and proximity to existing pedestrian networks, and did not score poorly against any assessment criteria.
- 11.5 Finally, the Oakfield and Goodmayes Transport Study (LBR2.52.2) details existing nearby cycle routes (figure 2.5), bus routes (figure 2.9), and local services (figure 2.21), all of which demonstrate that the site provides a sustainable location. This study concluded at paragraph 7.1.1 that “pedestrian accessibility to the wider area is good with the local centre

and numerous local amenities and facilities including medical, schools, shops and banks located within an acceptable walking distance from the site” and that “many surrounding services, amenities and other settlement areas can safely be accessed by cycle from both sites within a 0-15 minute journey time.” Such accessibility will also be further enhanced through ongoing investment in Green Corridor 1: Woodford – Hainault; a new walking and cycle route across the north of the borough as part of the implementation of the Redbridge Local Implementation Plan. It is noted that this should be included in Appendix 2, therefore the following modification is suggested:

11.6 Insert additional infrastructure item to read:

*“Transport – Public realm – Green Corridor 1: Woodford – Hainault walking and cycling route - £200,000.00 - Transport for London Local Implementation (LIP) – London Borough of Redbridge – Phase 1 – Necessary”*

**xii) How would the development of Oakfield promote sustainable patterns of development?**

12.1 As set out in response to question (xi) above, Oakfield represents a sustainable location, accessible through a range of means, well served by public transport, and in close proximity to a range of shops and local services in Barkingside town centre. It is also in close proximity to the borough’s largest country park and leisure facility at Fairlop Waters Country Park; offering opportunities for outdoor recreation. The site can therefore promote sustainable patterns of development by minimising the need for residents to make car journeys to meet their shopping, work, and leisure needs. Increased spending capacity in the local area can also help sustain and enhance the vitality and viability of Barkingside District Centre.

12.2 In addition, the size of the site offers a number of benefits in terms of promoting sustainable patterns of development. As demonstrated through the Concept Masterplans for Green Belt Release Sites (LBR2.78) the site can:

- accommodate an on-site secondary school and local health hub; further reducing the need for unnecessary car trips from residents;
- incorporate publically accessible open space for informal use by residents and the wider community;
- enhance permeability through the site; improving surrounding residents accessibility to Barkingside town centre.

12.3 In addition, site size increases scope for the provision of a mix dwelling sizes and tenure types that can help secure mixed and balanced communities.

**xiii) 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?**

13.1 Appendix 1 of the Local Plan sets out that Oakfield is anticipated for delivery in phase 3 of the plan i.e. between 2025 and 2030. The identified phasing of delivery of this site arises from (a) the requirement for adoption of the Local Plan, and (b) the re-provision of existing pitches and facilities, and the existence of a covenant on the land. The current Asset of Community Value (ACV) listing will expire on 28/02/2021, thus before the anticipated phase in which the Oakfield site will be developed.

13.2 Whilst the ACV designation covering the site may be a material consideration, whether it attracts weight depends on the circumstances. Given it is proposed that the facilities presently located at Oakfield will be relocated as required by Policy LP1E and Policy LP35, there is no net loss of community facilities or assets. As such, it is not considered that the proposal should attract weight.

13.3 The ACV listing requires an opportunity to be given to the local community to bid for the site in the event that it is sold by the Council. In such circumstances, there is no legal obligation on the Council as landowner to accept that bid. Any bid that did not envisage the development of the site to contribute to meeting development needs in accordance with the Development Plan would be a factor that the Council is entitled to and acting responsibly would need to take into account in considering that bid. In addition, as referred to above, the current ACV listing is due to expire on 28/01/2021.

13.4 Regarding the covenant on the land, as the Council has statutory powers to appropriate for planning purposes and therefore render any restrictive covenants void. The Council will consider extinguishing these as appropriate after the Local Plan is adopted. Again, as the site is anticipated for delivery in the final phase of the plan, taking such measures is not anticipated to impact on delivery post 2025.