

The Inspector, in paragraphs 13-14 of his letter dated 27<sup>th</sup> June 2017, requested that the London Borough of Redbridge Council clarify the position in relation to the surplus or deficient of playing pitch provision for football and cricket if;

- Oakfield and Ford Sports Ground are not developed for housing;
- Only Oakfield is developed for housing;
- Only Ford Sports Ground is developed for housing; and
- Both Oakfield and Ford Sports Ground are developed for housing.

The Council have endeavoured to clarify the position of each scenario in submission document CED050 and arrived at an overall conclusion that there would be sufficient playing pitch provision for cricket and football within the borough to meet demand in 2030. In reaching this conclusion the Council have not engaged with Sport England, National Governing Bodies for Sport (NGB's) or any other Playing Pitch Strategy (PPS) Steering Group members and therefore Sport England does not consider that the Council have robustly assessed these scenarios. It is also not clear which Council services have had input into the response, for example did leisure, parks/open spaces, education etc. have any input?

As the Inspector notes at paragraph 16, further work would be required to be able to categorically confirm the playing pitch situation in some scenario's. The Council have not undertaken any further work besides collating information from documents that already existed at the time of the Examination in Public, namely the PPS (LBR 2.43) and the Institute of Groundmanship (IOG) reports (LBR. 2.44.1, LBR 2.44.5, LBR 2.44.6 and LBR 2.44.7), and consolidating it within a statement (CED050). In consequence, the concerns that have been repeatedly raised by Sport England, NGB's and local stakeholder groups, such as Save Oakfield Society, in relation to the approach taken in the IOG reports and by the Council in seeking the intensification of existing sites are still very much pertinent. These concerns have been addressed in Sport England's representations throughout the development of the Local Plan and the Examination process.

The PPS, adopted by the Council, underwent a stringent and robust process that thoroughly assessed the supply and demand of playing pitches within the borough and set a clear strategy for playing pitch provision until 2030. The PPS is a 'live' document and should be reviewed and updated regularly by the Council and PPS Steering Group. Since the adoption of the PPS there have been two 'Stage E' meetings (the "*Deliver the strategy and keep it robust and up to date*" stage in Sport England's PPS guidance) therefore the Council have generally been engaging with the relevant stakeholders in relation to pitch provision. This, though, has not been the case in relation to document CED050 and therefore the Council's comments of the scenarios have not undergone the robust scrutiny required to confirm that there would not be a deficit of playing pitches. It should be noted that the PPS did examine two scenarios which was challenged by the steering group who were ultimately content with the assessment and subsequently signed off the document. The Council have not sought this same level of scrutiny for the scenarios stated by the Inspector and have provided a quick response which raises questions of how thorough these comments

have been considered and the robustness of the conclusions. As a comparison, the preparation and adoption of PPS can take up to nine to twelve months but even longer in some instances.

Sport England have reviewed the Councils' view stated in CED050 and contained in the table below are its comments on various paragraphs and tables of CED050 for the Inspectors' consideration.

Scenario 1 - Oakfield and Ford Sports Ground are not developed for housing

Paragraph (unless specified as a table)	Comment
Table 1.4	<p>Does this information consider match equivalents? (there is some mention of games but other references to pitches). Even good pitches can only take 3 (adult), 4 (youth) or 6 (mini) games, this could be less on 'open sites' due to informal use.</p> <p>Although matches can be staggered in theory, can they in reality be staggered (for example due to league rules, changing room space constraints, pitches maintained to the required quality standards for such use, even during bad weather and so on.).</p> <p>There is also a no real assessment of peak period usage.</p> <p>Sub area 1 - 9v9 football - not clear if pitch supply could meet demand. This would depend on Wandstead Flats masterplan and whether 3G Arterial Grass Pitches (AGP) could be provided. It is also not clear where the 5v5 deficit would be met at this site.</p> <p>Sub area 2 – The surplus identified is at Whitbread Sports Ground but there is no secured community use of this site so it is arguable if in reality there is/would be a surplus at this stage.</p> <p>Sub area 3- To address the deficit bring Whitbread Sports Ground into community use but note comment in relation to community use above. Insinuates that Hainault would be used by reconfiguring pitches but it doesn't appear that the junior 11 v 11 needs would be met if Starch House Lane FC move but if they stay it appears the juniors would be playing on senior pitches which is not advised and could result in potential overplay of pitches. It would also need to be determined that the sites that are being considered for Starch House Lane FC are in a suitable location and have as good accessibility as their current site, especially since they have teams from age groups as young as under 7's. 9v9, 7v7 and 5v5 needs could be met with 3G AGP's but this 'opportunity' needs to be explored therefore no certainty at present therefore other playing filed sites might be required.</p> <p>Sub area 4 – Relies on a Community Use Agreement being signed and improving pitch quality. As stated in</p>

	<p>previous Sport England comments there are questions whether the Council can provide this level of maintenance given the reductions in budget. Various measures to secure funding to increase maintenance were muted at the Examination in Public but these all appeared to be indicative with no certain approach to secure the funds required.</p> <p>Sub area 5 – Highlights a surplus at Goodmayes Park Extension but the PPS states that this site is required for certain actions therefore indicating that this site is not surplus.</p> <p>Sub area 6 – The extra two pitches stated are not in the PPS future demand table (table 3.29) so have these been included elsewhere in the supply data or does the PPS need updating and then the strategy amended to reflect this provision. Sport England would note that these playing pitches have not been mentioned until now.</p> <p>Sub area 7 – Although mentions there could be use of sites, it appears that there is no deficit here. However, there are potential questions relating to peak period usage (i.e. is there a deficit during this period and ensuring the playing pitches can be maintained to a certain standard). The 9v9 and 7v7 deficit could be met by the 3G AGP but peak usage needs consideration as well as the correct location for the facility. The document does not appear to clarify where it would be located therefore there are question marks whether it would or could be located in sub area 7. Furthermore, the 5v5 data is at odds with the PPS as the PPS states there is a deficit of -19 not -13 but even if this figure is post the actions the deficit would reduce by 8 and this would not result in -13. This raises questions in relation to the Council's interpretation of the PPS.</p>
Table 1.7	<p>Sub area 1 – Improvement to Hainault pitches would accommodate games and PPS, paragraph 3.118, indicates 7 pitches are required. The IOG report notes that the cricket pitches cannot be used simultaneously due to safety and that the boundaries are substandard therefore cricket might have to spill over onto adjacent sites, such as Forest Road. There are already quality issues at Hainault (see PPS, paragraph 3.128) which indicates that there are constraints to achieving better quality playing pitches therefore it is questionable whether improvements can be undertaken in order for the cricket pitches to meet the required quality standards.</p> <p>Sub areas 1, 2 and 7– It appears that all the actions required by the PPS would not be undertaken in these areas. If merely the actions that are quoted in table 1.7 are undertaken this would not meet the required capacity to meet the need.</p> <p>Sub area 3 – PPS Actions, and therefore the actions quoted CD050, need to be revisited by the PPS Steering Group due to the limitations highlighted by the IOG assessment. This work needs to be undertaken to ensure that there would be the required amount of safe cricket pitches to meet current and future demand. Furthermore, the requirements of the South Asian League need to be established as stated in table 4.4 of the PPS. Once this work has been undertaken there will be a clearer picture of what is required for cricket within</p>

	<p>the borough. It should be noted that South Asian League community is growing and represents at least 35% (approx.) of the cricket playing population. It has also resulted in positive benefits of social cohesion, for example the annual Sri Lankan Festival of Cricket now attracts crowds of more than 5,000 players and spectators.</p>
2.4	<p>The matters around Hainault and the cricket pitches need to be re-assessed given the reduced boundary situation which has now arisen. There is again reliance on the quality being upgraded to a good standard which the Council have failed to confirm would actually happen with a reduced budget. The provision of new cricket pitches at Goodmayes Park and Forest Road to meet the need has not been raised previously and is not in the PPS.</p>
2.5	<p>Have the ECB been involved with this work? It is unclear if the cricket squares are suitable and would have the appropriate ancillary facilities.</p>
3.1	<p>The boundary issues relating to Hainault should be considered with the ECB/PPS Steering Group as other sites might be required to meet the actions in the PPS for Hainault if less cricket pitches have to be marked on that site.</p> <p>Overall, if Oakfield and Ford Sports are not developed it is not clear that the identified demand would be met in Sub Area 3 and, as acknowledged by the Council, the approach relies on 3G AGP's coming forward. However, given the costs given in the IOG report being lower than Sport England guidance, it is questionable that the costs of this has been fully considered and therefore deliverable.</p>

Scenario 2 - Only Oakfield is developed for housing

Paragraph (unless specified as a table)	Comment
1.7	<p>In order to meet Sport England's Playing Field Policy and paragraph 74 of the NPPF any replacement facilities should be of at least equivalent accessibility and not merely be 'reasonably' accessible. It should be noted that masterplans are not seeking new/replacement provision, except for Billet Road, but are seeking to retain existing playing pitches. There are number of references to these, and other, sites relating to the masterplanning work in each scenario but these should not be considered new pitches (except Billet Road).</p>
1.8	<p><i>"However, it has to be recognised that it may not be feasible to provide all future playing pitch facilities required within sub area"</i> – Sport England does not advocate several smaller playing fields as replacements for a larger playing field as large sites are more flexible. Furthermore, if the large site is the current situation it is questionable if the replacement would be of equivalent quality as smaller sites would increase costs etc. (i.e. 2 sites, 2 sets of changing rooms, maintenance, more volunteer 'workforce' required etc.).</p>
1.9	<p>Current playing pitch, or playing field, sites should not be considered as replacement as, by definition, they are not replacement sites they are existing sites that the Council are seeking to intensify. It also suggested that only existing playing fields have been considered which, although might not have been the case, the</p>

	<p>studies/assessments that have been undertaken (and are included in the evidence base for the Local Plan) did not fully consider non-playing field sites which were dismissed too quickly in favour of Council sites. Although ownership could affect deliverability, ownership is not a factor when selecting replacement sites. Similarly, a playing field is not defined by its ownership.</p>
1.10	<p>The studies the Council have commissioned have essentially considered current playing pitches and merely looks at moving the pitches. They do not consider the playing field as a whole (as required by the NPPF paragraph 74) and its potential to add pitches as demand develops and its function for informal use, training, sports not covered in PPS etc. The PPS at table 4.2 states “<i>The Playing Pitch Strategy identifies a need, based on its analysis, to retain all current existing playing field provision...</i>”</p>
1.11	<p>Sport England has repeatedly set out in its official comments during the Local Plan process and when consulted on supporting documentation that the feasibility study does not robustly assess the strategic requirements of the sites.</p>
1.12	<p>Issues with ‘splitting up’ the existing site has already been highlighted. It is not clear how this would work in practice, would clubs have to use several sites (which would be contrary to the NPPF as this would not be an equivalent replacement)? What are the maintenance and management implications, including cost? Would each ‘new’ site have equivalent quality facilities, such as clubhouses on each site? Would this increase overall costs? What would be the impact on the numbers of volunteers that are needed to help run the clubs? What would be the impact on the character of a club (i.e. loss of central/established base)?</p> <p>In addition, again this applicable to all references to all the ‘masterplanned’ sites in each scenario, the layouts merely show areas in various shapes and only suggest that they can accommodate a certain number of playing pitches but it is not overly clear that is the case. Oakfield, for example, provides ‘an amenity open space’ for ‘shared-use sports pitches’ that does not fit with any of the existing pitches and implies that the pavilions will be lost. If the pitches are also used for amenity space, then the informal recreational use would affect their quality.</p>
Table 2.3	<p>Does not look at the required number of pitches by 2030 for Hainault. The PPS has actions for that site.</p>
1.15 and Table 2.4	<p>Includes playing pitches to be retained at Oakfield but note concerns raised above.</p>
1.17 and above tables	<p>Have new teams that would be created due to the increase in population if Oakfield has been developed been factored in?</p>
Table 2.7	<p>Adult football – Whitbread Sports Ground (current lack of secured community use aside) is required in scenario 1 to address the deficit for junior 11 v 11 football therefore using this site to address the adult deficiency in scenario 2 is taking away a site that is needed to address the junior 11 v 11 pitches in scenario 1. How can the development/playing field loss option, i.e. Scenario 2, result in this site not needed anymore to address junior 11 v11 which would have been required if no development occurred? Furthermore, as noted earlier in relation to Whitbread Sports Field, it is arguable if the site has a surplus as it is not in community use.</p> <p>States there is a deficit of 9 junior 11v11 that needs addressing but table 1.4, the non-development scenario, states there would be a deficit of 14 pitches that needs addressing. It is not clear how the loss of Oakfield</p>

	<p>Playing Field to development, which itself would provide more housing and therefore demand, would result in less of a deficit than a non-development option. Table 1.4 relies on reconfiguring adult pitches to junior 11 v11 which cannot be done in this scenario (hence it not being stated as an action).</p> <p>If Starch House Lane FC do not move, then Goodmayes Park would only provide 3 junior 11v11 as 4 adult pitches would be required in this scenario. However, in the 'non-development' scenario it states that 5 adult pitches at Goodmayes Park could be used for junior 11 v 11 football which indicates there would be deficit of pitches in scenario 2.</p> <p>The actions to address the deficit of junior 11v11 does not, therefore, appear to result in addressing the deficit in the 9, and certainly not the 14 pitches.</p> <p>The deficits for 9v9, 7v7 and 5v5 football are the same compared to table 1.4 but would there be a loss of pitches at Oakfield if it is re-developed therefore should the deficit in the first column be higher?</p>
1.21	The PPS should be a live document, hence 'Stage E' meetings referred to above, therefore these sites, if deliverable, should be built into the PPS to ensure the provision proposed for those sites are robustly checked and challenged to ensure sport/clubs are not adversely affected and that they are sufficient to meet the need.
2.13	These sites would need to be considered thoroughly to ensure that the same quality of facilities, for example playing field and pavilions, can be provided. Splitting up sites would add maintenance and management costs and could also affect how the clubs are run. If this is negative, then the proposal cannot be considered equivalent quality as required by the NPPF. Generally, larger multi-pitch sites are easier to maintain and manage than smaller sites with only a pitch. Also, larger sites can one have pavilion whereas the smaller sites will have one pavilion per site to ensure it is of equivalent quality. It is not clear if this has been factored in.
Table 2.9	<p>Does not appear to consider the 2030 requirements for Hainault. The PPS indicates that this site should undergo improvements to provide sufficient quality facilities for teams based in PPS sub areas 1 and 2, although this is noted in table 2.10.</p> <p>According to the PPS, Hainault has 10 cricket squares with 10 pitches on each square not what is stated here (Sport England is assuming that the non-bracketed number is the number of cricket squares at a site). As previously noted, the IOG report highlighted that the cricket pitches on Hainault do not meet the required boundary length and therefore cannot be played simultaneously (in addition to potential future issues relating to their size). This needs to be incorporated within any assessment (and the PPS needs to be updated to reflect this via a Stage E review). The outcome of this may require adjacent sites to accommodate cricket pitches.</p>
2.18 and 2.19	Has this been checked with the club(s) and ECB to ensure that this is possible? This assertion does not consider the boundary issue at Hainault. There could also be issues relating to splitting sites in terms of maintenance, management, costs and providing equivalent facilities.
2.20 and 2.21	The provision of cricket will rely on 3G rubber crumb pitches? This would need some elaboration as AGP's

	<p>normally hinder cricket pitches being marked. There is no mention of 3G rubber crumb pitches previously in scenario 2. Is this meant to refer to artificial wickets or playing on the 3G AGP's? The latter would be unacceptable while the former would need to be in line with the PPS recommendations.</p> <p>There is no mention of the South Asian cricket league demand provision which is on Hainault and is growing. An action of the PPS is for the Council and league to meet and discuss. It is not clear from document CED050 if these discussions have taken place and what the outcomes are.</p>
3.1	<p>Sport England contest that it is clear as the Council suggest based on the above comments and questions that have not been addressed. It is also unclear if the demand from Oakfield's new residents (if developed) on that sub area has been fully considered and incorporated within this scenario especially since there is significant loss of important high quality football and cricket pitches and playing field.</p>

Scenario 3 - Only Ford Sports Ground is developed for housing

Paragraph (unless specified as a table)	Comment
1.5	<p>Key to note that "<i>the Council have identified...</i>" and not all stakeholders. No consideration has been given to Goodmayes Park Extension's requirements to meet deficits in the borough as stated in the PPS. Also, LBR 2.44.6 and LBR 2.44.7 considers only current provision of Fords and not the future requirements or takes in consideration matters such as potential overplay etc. The AGP would help to address this with mini soccer but again there are cost and space implications of this, i.e. restricting the flexibility of the playing field to have a range of playing pitches marked.</p>
1.6	<p>Again, is it appropriate for the playing field/pitches to be located here? Is the mix appropriate? How was the mix decided? What are the implications for the clubs that might be using these facilities? Will equivalent ancillary facilities (pavilion, changing rooms etc.) be incorporated at each site. These questions should be answered.</p>
1.8 onwards	<p>The paragraph indicates that Goodmayes Park could be used as a replacement for Ford Sports Ground. Goodmayes Park, like Goodmayes Park Extension, has its own actions to meet Redbridge's playing pitch needs and has not been discussed as a replacement site previously. Is this an error or are the Council now considering Goodmayes Park as an alternative? It is not clear where the three pitches to be upgraded referred to are located? The paragraphs are unclear and Sport England need clarification before being able to fully comment.</p>
1.10	<p>In terms of mini soccer, is the AGP's referred to in in table 3.2 full size? If so, which is more than likely, then they can accommodate two or four pitches therefore if looking solely in terms of pitch numbers there are the same number of pitches. However, the IOG report states 4 7v7 grass pitches which will not be able to accommodate the same number of games as an AGP due to wear and tear. Similar can be said about the 5v5 pitches. In consequence, there will be a deficit in 7v7 pitches unless the equivalent number of grass pitches that can accommodate the same number of matches as an AGP are provided on Goodmayes Park</p>

	Extension, which does not appeaser to be the case.
1.11	Unclear if this refers to Goodmayes Park or Goodmayes Park Extension.
1.13	The pitches could be reconfigured but need to understand if they would be in the right place to meet future need. What would be the impact on the clubs that are affected? If they have to be run differently, have additional costs etc.? If so this would not be an equivalent replacement. Also, the shortfall in paragraph 1.10 is not clear. Is there a shortfall at Goodmayes Park? The IOG report considered Goodmayes Park Extension.
1.14 and 1.15	These would need to be explored further before being able to base any weight on these paragraphs. Cranbrook and Seven Kings, like Goodmayes Park Extension, has actions in the PPS to explore to meet future needs for the borough. Also, if a 3G AGP is constructed on Goodmayes Park Extension what impact would that have on the feasibility for two 3G AGP's on Seven Kings. Would this be sustainable and manageable? Further robust feasibility work would be required.
1.16 and 1.17	Sport England disputes the assertion that it is clear. There are deficiencies with junior and mini soccer that do not appear to be addressed and further work (as highlighted above) is required to be in any position to support this summery.
2.1	PPS does not recommend that Ford's Sports Ground current use can transfer to Seven Kings Park. It states that the feasibility should be undertaken to consider Seven Kings Park, at land located between Seven Kings Park and the southern part of Ford Sports. This feasibility work has not been undertaken.
2.2	This statement is true in relation to Goodmayes Park Extension.
2.5	Sport England has the same concerns already raised in relation to these 'new' sites.
2.7	Raises the question why Ford's cricket pitches cannot be accommodated at Forest Road? This is what the PPS indicated subject to feasibility. Furthermore, it is not clear at this stage what the South Asian Cricket Community needs are.
2.9	The PPS (p. 104) states in the action plan that " <i>Goodmayes Park Extension....to assist with meeting the projected requires of playing pitches to 2020</i> " This has not been considered during this scenario. Therefore, cannot state with any certainty that if Ford Sports Ground is developed then there will be sufficient cricket pitches for team demand by 2030 to meet the needs of cricket across the whole borough.
2.10	Same comments as articulated above in relation to the potential 'new' sites.
3.1	Having considered the content of the assessment, Sport England does not consider that this is the case. Further work is required until there is an evidence base to support this assertion. At present, there are questions relating to the football pitches and it would appear that there would be a deficit if Fords Sports Ground is lost. Furthermore, no considerable consideration has been given to the additional population stated in the Local Plan in light of the playing field loss and how this would affect the supply and demand balance for both football and cricket pitches within the borough.

Scenario 4 - Both Oakfield and Ford Sports Ground are developed for housing

Paragraph (unless specified as a table)	Comment
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1.6	They should be accessible to current members, clubs and the community not merely 'reasonably accessible'. Have the assessments been based on sites that would be just 'reasonably accessible'?
1.9	Same concerns already raised in relation to 'new' pitches. It is concerning that the paragraph states that ' <i>should these sites come forward</i> ' which suggests there are no guarantees. In consequence, these sites could be lost without any adequate replacement.
Table 4.3	As raised above, the table does not consider Hainault's future requirements as stated in the PPS.
Table 4.4	There are no guarantee pitches would be retained at Oakfield
Table 4.7	<p>Should this table be the same as table 2.7? Meeting the adult deficiency is different here.</p> <p>Adult football – The action relating to Whitbread (current lack of secured community use aside) is required in scenario 1 to address the deficit for junior 11 v 11 pitches so by using this site to address the adult deficiency in this scenario it is taking away a site that is needed to address the junior 11 v 11 pitches if no development occurs. In consequence, how can the development/playing field loss option result in this site not being needed anymore to address junior 11 v11 provision. Also, as noted above, it is arguable that Whitbread is truly surplus as it is not in community use</p> <p>It is questionable why the teams from Hainault must be transferred to Whitbread's? If this occurs, not only Oakfield's clubs will be displaced but also Hainault's' clubs. The impact on these clubs is unclear. Is Whitbread of equivalent quality and accessibility including costs etc. Currently it is not as community use at Whitbread's is not secured.</p> <p>Junior 11 v 11 – states deficit of 9 11v11 pitches but table 1.4, the 'non-development' scenario, states there will be a deficit of 14 pitches. It is not clear how the loss of Oakfield playing pitches to development, which itself will provide more housing and therefore demand, would result in less of a deficit than a non-development scenario.</p> <p>Is the reference to Goodmayes Park or Goodmayes Park Extension? If the former this has not been considered before now and therefore feasibility etc. would be required. Furthermore, Goodmayes Park Extension (and Goodmayes Park) have their own actions in the PPS (aside from Starch House Lane FC relocation – see action plan in the PPS). It is not clear how the actions in this table would affect these actions.</p> <p>The PPS indicates that feasibility work is required in relation to Seven Kings so it is unclear if this site could accommodate what is required to the standard that is required taking into consideration its own requirements to meet Redbridge's future pitch needs stated in the PPS.</p> <p>The above aside, are the clubs/leagues willing to accept staggered start times and what impact will this have on the quality of the pitches? For instance, can the pitches be maintained to the required level?</p>

	<p>Sport England would also add this section is confusing. Will there be three pitches created at Starch House Lane? This is an existing site so are these pitches above what is already there? It appears that Starch House Lane FC might have to operate over 2 sites if this action is to occur which is not acceptable. Sport England does not consider that it is clear how the deficit in Junior 11v11 will be addressed without compromising the operation of clubs. More explanation, and liaising with the clubs, site owners and NGB's is needed before being able to draw any robust conclusions.</p> <p>The deficits for 9v9, 7v7 and 5v5 remain the same compared to table 1.4 but since there would be pitches lost should the deficit in the first column be higher?</p>
1.22	<p>The Council have identified but not all stakeholders. No consideration has been given to Goodmayes Park Extension's requirements to meet deficits in the borough as described in the PPS. In addition, LBR 2.44.1, LBR 2.44.5, LBR.44.6 and LBR 2.44.7 looks only at current provision of Fords and not the future requirements or takes into consideration matters such as potential overplay etc. An AGP would help to address this with mini soccer but again there are cost and space implications such as restricting the flexibility of marking out a range of pitches on the playing field.</p>
1.23	<p>The concerns relating to new sites have already been expressed. Although this is merely an introductory section, these sites were also referenced in the Oakfield replacements. All these sites cannot be used as replacements of the Fords as some are 'needed' for Oakfield and vice versa.</p>
1.25	<p>It is noted that there is reference to Goodmayes Park and Goodmayes Park Extension so again it is not clear if both existing playing fields are being considered for Ford Sports Ground's replacement or just one as per the thrust of the rest of the evidence base and Local Plan documents submitted for examination. Have the FA/League confirmed that the staggered start times are acceptable?</p>
1.27	<p>In terms of mini soccer, are the AGP's referred to in the table above full size? It is more than likely, so they can actually take two (7v7) or four (5v5) pitches. Therefore, if considering solely in terms of pitch numbers there are the same number of 7v7 pitches but the IOG states 4 grass pitches will be required but these will not be able to accommodate the same number of matches as an AGP due to wear and tear. Similar can be said about 5v5. In consequence, there will be a deficit in 7v7 pitches unless the equivalent number of grass pitches that can accommodate the same number of matches as an AGP are provided on Goodmayes Park Extension.</p>
1.28	<p>Goodmayes Park or Goodmayes Park Extension? If former the Council are appearing to introduce a different site for the Ford Sports Grounds replacement which is again not suggested in the PPS. Both sites have their own actions in the PPS not related to the loss of Ford Sports Ground or Oakfield Playing Fields.</p>
1.29	<p>There is no guarantee these playing field/pitches will come forward. Also, note previous concerns raised in relation to the 'new' sites.</p> <p>Can/will Starch House Lane FC move here and what affect will it have on the running of the club? Will teams have to split between sites which would not have happened if they were to locate to Goodmayes Park</p>

	Extension?
1.31	<p>These would need to be explored further before being able to base any weight to this paragraph. Cranbrook and Seven Kings, similar to Goodmayes Park Extension, has actions in the PPS to explore to meet future needs for the borough. Also, if a 3G AGP is constructed Goodmayes Park Extension what impact would that have on the feasibility for two 3G AGP's on Seven Kings? Would this be sustainable and manageable? Robust feasibility work would be required.</p> <p>Furthermore, Table 4.7 appears to suggest that Seven Kings Park and Cranbrook School could be used to address the deficit of junior 11v11 playing pitches. Can the PPS actions identified for Goodmayes Park or Goodmayes Park Extension (whichever site the Council are referring to here) be accommodated on top of what appears to be suggested in table 4.7 relating to Oakfield Playing Fields' 'replacement'?</p>
1.32	<p>It is not clear that the context of this paragraph is true. There are uncertainties with junior and mini soccer and further work is required for the Council to be in any position to back up this summary as highlighted above.</p> <p>In addition, it is unclear if providing AGP's are feasible. For example, as indicated in Sport England's previous comments on the Local Plan, the IOG costs for AGP's were considerably below those indicated in Sport England Guidance and no provision for a sink fund, for example, were incorporated.</p>
1.33	<p>This is considering playing pitch provision too broadly, the PPS had sub areas for a reason, it is how sport is played in the borough based on catchment areas, housing areas etc., which the Council would have recommended as part of the PPS process. Looking merely at a borough wide scale, which this paragraph appears insinuate, may result in no deficit (which Sport England doubts given the Council have failed to establish this is any post PPS 'assessments) but could well result in the playing pitches in locations where they are not needed and/or create additional burdens on clubs or individuals' ability to participate in sport. This interpretation is concerning and would be negative to sport in Redbridge. Essentially, the live PPS document/Steering Group should be engaged to check and challenge these assertions and any new data can be fed into the live document which then can update the overall strategy. This would be a robust process with all stakeholders engaged that would positively plan for sport. It is the PPS that should inform Local Plans as it has undergone robust scrutiny and will remain a live document throughout the plan period. This is the accepted approach provided Sport England's PPS guidance has been followed.</p>
1.34	Sport England have already stated in relation to the new playing pitches on these masterplanning sites.
2.9	As already highlighted the sites should be accessible not merely 'reasonably accessible'
2.13	These sites would need to be considered thoroughly to ensure that the same quality of facilities, such as playing fields and pavilions (for example) can be provided. Splitting up sites would add maintenance and management costs and could also affect the how the clubs are run. If this is negative, then it is not equivalent quality as required by the NPPF. Generally, larger multi-pitch sites are easier to maintain and

	<p>manage than smaller sites with just one or two pitches on. Furthermore, larger sites can one have pavilion whereas the smaller sites will have one pavilion per site to be considered 'equivalent'.</p>
Table 4.11	<p>The table does not consider the 2030 requirements for Hainault. The PPS indicates that this site should undergo improvements to provide sufficient quality facilities for teams based in PPS sub areas 1 and 2, although this is noted in table 4.12. According to the PPS Hainault has 10 cricket squares with 10 pitches on each square which differs from the data in this document (Sport England is assuming that the non-bracket number is the number of cricket squares at a site). The IOG report highlighted that the cricket pitches on Hainault do not meet the required boundary lengths and therefore cannot be played simultaneously (in addition to potential future issues relating to their size). This needs to be incorporated within any assessment (and the PPS needs to be updated to reflect this matter via Stage E review) and may require adjacent sites having to accommodate cricket pitches.</p>
2.18 and 2.19	<p>Have these actions been checked with the club and ECB that this action is possible? Would clubs be detrimentally affected? What would be the situation with the supporting facilities, pavilion etc.? Have the boundary issues at Hainault been taken into consideration?</p> <p>There are issues about splitting sites in relation to maintenance, management and providing equivalent facilities which have been expressed in earlier scenario comments.</p>
2.21	<p>The PPS does not recommend that Ford Sports Ground's current use can transfer to Seven Kings Park. It states that the feasibility should be undertaken to consider if the pitches can be transferred to Seven Kings Park, land located between Seven Kings Park and the southern part of Ford Sports. This feasibility work has not been undertaken.</p>
2.22 & 2.23	<p>This statement is true in relation to Goodmayes Park Extension.</p>
2.24	<p>The IOG report considered Goodmayes Park Extension</p>
2.25 & 2.31	<p>Comments have already been stated in relation to Sport England concerns of new smaller sites.</p>
2.27	<p>Sport England would question why Fords cricket pitches cannot be accommodated at Forest Road? This is what the PPS indicated (subject to feasibility). It is also not clear at this stage what the South Asian Cricket community needs are.</p>
2.29	<p>The PPS states in the action plan (p. 104) that "<i>Goodmayes Park Extension....to assist with meeting the projected requires of playing pitches to 2020</i>" This has not been considered during this scenario nor has the increase in demand from the number of residential properties stated in the Local Plan. In consequence, it cannot be stated with any certainty that if Ford Sports Ground is developed there will be sufficient cricket pitches for team demand by 2030 to meet the needs of cricket teams across the whole borough.</p>
2.30	<p>This is considering playing pitch provision too broadly, the PPS had sub areas for a reason, it is how sport is played in the borough based on catchment areas, housing areas etc., which the Council would have recommended as part of the PPS process. Looking merely at a borough wide scale, which this paragraph appears to insinuate, may result in no deficit (which Sport England doubts given the Council have failed to establish this in any post PPS 'assessments') but could result in the playing pitches in locations where they are not needed and/or create addition burden on clubs or individual's ability to participate in sport. This</p>

	<p>interpretation is concerning and would be negative to sport in Redbridge. Essentially, the 'live' PPS document/Steering Group should be engaged to check and challenge these assertions and any new data can be feed into the live document which then can update the overall strategy. This would be a robust process with all stakeholders engaged which would be positively planning for sport. It is the PPS that should inform Local Plans as it has undergone robust scrutiny and will remain a live document throughout the plan period.</p>
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Overall, it is not clear that future provision in 2030 would definitely be met by the 'non-development' (scenario 1) as it relies on several actions, as advised by the PPS, to be undertaken. In consequence, despite the Council suggestions, it is not clear that the development of Oakfield Playing Fields or Ford Sports Ground or both would result in Redbridge's playing pitch needs being addressed during the plan period. Sport England considers that there are too many outstanding questions in the Council's assessment of scenarios 2, 3 and 4 to categorically confirm that the London Borough of Redbridge would not have a deficit in playing pitches, especially in relation to football which would appear to have a deficit if scenarios 2, 3 or 4 are implemented.

There are also unknown factors such as the South Asian League cricket current and future needs (which is growing and currently accounts for at least 35% of the cricket playing population according to the ECB), whether clubs would be detrimentally affected by moving or possibly having to be split between sites, whether there is enough funds to maintain and manage sites to the level expected including providing equivalent ancillary facilities such as pavilions, if the sites can actually meet the quality standards indicated in the IOG reports, whether the 3G AGP's can be delivered, the impact on enlarging Hainault's existing cricket pitches on supply and demand amongst others. The scenarios presented are quite contrived with considerable movement between sites which might not ultimately be practical. There is a real risk that scenarios 2, 3 and 4 could compromise the future of participation in playing, volunteering and managing organised football and cricket in Redbridge and beyond. These factors should be considered under the scrutiny of the PPS steering group and feed into the PPS, which is a live document throughout the Local Plan period. Currently there has been limited consultation with only one user of Oakfield playing fields (Old Parkonians Association, without the OPCC which in effect means only the OPFC have been involved) who's needs may differ from other users. The Council cannot adequately plan for the scenarios before the requirements of all the users are understood through meaningful engagement via the PPS Steering Group and local stakeholders.

In consequence, based on the information contained within the PPS and the content of document CD050, Sport England does not consider that there would be sufficient pitches to meet demand if either site or both sites would be developed. The Council have not undertaken a strategic approach in this assessment which appears to merely be a numbers exercise without considering how sport is actually played in the borough and the impact on the clubs, which if negative cannot be considered to result in equivalent quality replacements. Since the intentions is to split up the pitch provision, move pitches/clubs around the borough, undertake extensive quality improvements (which have to be maintained to that level on reduced budgets) and looking to implement different actions to those in the PPS which have not undergone robust scrutiny with key stakeholders and do not

appear to deliver the required number of pitches in some stances, Sport England maintain that both Oakfield Playing Field and Ford Sports Ground should be retained to deliver the borough's playing pitch, and more informal, health and recreation needs.

Furthermore, the focus is on meeting playing pitch needs in 2030 however the demand for playing pitches will grow as the population grows towards the 2030 projections. Playing pitches would need to be delivered at the right time to match this growth which has not been acknowledged throughout the Council submission. It is key that the right number of playing pitches, in the right locations, are available as the population grows to 2030 so the pitches are not 'backloaded' to the end of the Local Plan period. Funds may not be available at certain points to implement when they are needed if there is an accelerated loss caused by the development of Ford Sports Ground and/or Oakfield Playing Fields.

Finally, the Inspector's questions focused on playing pitches, as does the PPS, but Sport England would like to again highlight that playing pitches only form a part of playing fields which provide a greater role in the health and wellbeing of a community since they provide for informal as well as formal sport and recreation. The Governments' (Sporting Future: A New Strategy for an Active Nation) and Sport England's (Towards an Active Nation) strategies recognise the importance of more informal forms of sport in addition to formal sports. Playing fields have a significant role in providing opportunities for a community to participate in such activities in addition to the benefits sport has on social cohesion and inclusion, such as the significant Inter Faith work being undertaken Essex Cricket in Redbridge, involving Mosques, schools and Churches. The loss of either, or both, of Ford Sport Ground or Oakfield Playing Fields would be significantly detrimental to the existing and future communities and would be at odds with the Government's and Sport England's strategies.

In planning terms, Sport England's statutory role is to protect playing field, as outlined in previous submissions, and the NPPF, at paragraph 74, makes specific mention of playing fields when addressing the protection of sports and recreation. The Council are proposing to intensify the use of existing playing field sites thereby resulting in a net loss of playing field within the borough which is contrary to the NPPF paragraph 74, especially in the context that the PPS, which is cited as an evidence base document, at table 4.2 states "*The Playing Pitch Strategy identifies a need, based on its analysis, to retain all current existing playing field provision...*"