

Christopher Waller

From: Mark Furnish [REDACTED]
Sent: 23 November 2017 09:55
To: DPD (Planning Service Area)
Subject: London Borough of Redbridge Local Plan Main modifications
Attachments: Local Plan 2015-2030 Draft Submission.docx; CIL and Planning Obligations Advice Note [FINAL v3. 28.06.17].pdf

Dear Sir/Madam,

Thank you for consulting Sport England on the main modifications to the London Borough of Redbridge's Local Plan.

Sport England has reviewed the main modification and supporting statement CED 062 and has the following comments:

- The modifications to the text and supporting text of Policies LP1B and LP1E have removed both Oakfield Playing Field and Ford Sports Ground from the Development Opportunity Sites designations in the Local Plan however Sport England cannot locate modified versions of figures 8 and 11 that indicate both these playing fields, and supporting infrastructure, are not within these designations. If the figures are not altered then the Local Plan would contradict itself.
- Given the importance of retaining all playing fields within the borough, as indicated by the Council's Playing Pitch Strategy, and the importance of both Oakfield Playing Field and Ford Sports Ground, Sport England expects that these sites should be safeguarded/designated as playing field to protect them from any loss. The Inspector has clearly highlighted that it is not clear that the borough's playing pitch needs can be met if these sites are lost which Sport England considers gives considerable weight for a protective designation in the Local Plan.
- Modification MM62 in relation to Policy LP35 (b) states "*Provision should be in accordance with standards set out in the Council's Open Spaces Study, unless superseded, and in dense urban areas could include the use of pocket parks, green roofs, and landscaping and public realm provision . Where this is impractical Where open space standards cannot be met on-site, financial contributions towards improvements to existing or planned nearby spaces within reasonable walking distance of the proposed development will be sought.*" and the additional text to paragraph 6.2.4 which states "*The findings of the Redbridge Open Space Study (2016) will be used to help determine where such investments should be made. This identifies accessibility standards for different types of open spaces according to their role and function; including 280m for pocket spaces, 400m for local spaces, and 1.2km for district spaces. It also identifies that in the south of the borough, Valentines Park, Seven Kings Park, Goodmayes Park, South Park, and Loxford Park all offer scope for future investment that could help them adapt to likely increased use arising from population growth*" Both proposed modified text suggests a standards approach to new provision. In relation to playing field/pitches the Council's adopted Playing Pitch Strategy (PPS) should direct what is required, where and when therefore the additional text should be modified to make clear that this should be the case when considering playing field/pitch provision. Sport England does not advocate a standards approach as standards do not consider the complexities of sports provision, such as where the demand is, what type pitch is required etc. Attached is a guidance note, which although aimed at CIL and S.106, sets out Sport England's position on a standards approach.
- Document LBR1.02 Policy Map Modifications October 2017 includes Map 1 and 2 that safeguarded sites in the view of the loss of Oakfield Playing Field and Ford Sports Ground. Since the Local Plan

appears to have been amended to remove these sites from the Development Opportunity Sites should these maps be changed to protecting the sites for playing field?

- The matters relating to the Development Opportunity Sites designations aside, the modifications do not address the other comments raised in Sport England's original comments to the Local Plan, in particular those comments under the headings of Schools, Integrated Approach to Health and Wellbeing and Achieving Quality Design and Promoting a Green Environment. A copy of Sport England's original comments are attached for convenience. Given the extent of growth proposed for Redbridge Sport England strongly recommends incorporating the principles of Active Design.

Overall, the Modifications appears to address Sport England's prominent objection to the Local Plan but there are still **concerns that it would seek some clarity upon before Sport England considers the Local Plan to be sound therefore being able to lift its objection.** Furthermore, the modification MM62 raises concerns as it advocates a standards approach instead of an approach guided by a robust strategy (the PPS) and other matters previously raised has not been addressed.

Sport England would welcome further engagement with the Council to address the above so that the Local Plan would effectively and positivity plan for sport and therefore fully lift Sport England's objection.

If you have any questions please do not hesitate to contact me.

Yours sincerely

Mark Furnish

Planning Manager



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