

Council's response to Sport England (CED055)

The Council maintains its position that, as set out in document CED050, there would be sufficient pitch provision to meet existing and future demand to 2030 in the borough should development occur in the scenarios set out by the Inspector.

Document CED050 further breaks down the two scenarios set out in the Playing Pitches Strategy (LBR 2.43), to address the Inspector's specific questions/scenarios. Document CED050 reiterates many of the actions set out in the Playing Pitch Strategy.

Document CED050 incorporates the proposals set out in the IOG feasibility studies (LBR 2.44.1, 2.44.5, 2.44.6 and 2.44.7) and the additional potential sports pitch provision identified through the Concept Masterplans on Green Belt Release Sites (LBR 2.78) into updated playing pitch calculations/ assumptions. As CED050 sets out, these Masterplans have identified additional pitch provision, above that as set out in the Playing Pitch Strategy, which will make an important additional contribution to overall provision in the borough. The Inspector should note:

- Scenario 1 - page 7 paragraph 1.7, and page 14 paragraph 2.5;
- Scenario 2 - page 7 paragraph 1.23, and page 10 paragraph 2.21;
- Scenario 3 - page 4 paragraph 1.17, and page 5 paragraph 2.10;
- Scenario 4 - pages 11 paragraph 1.34, and page 15 paragraph 2.31, and;
- Overall conclusion in paragraphs 3.1 - 3.3 on page 16.

Many of the objections made by Sport England in its latest representation (document CED055) have been previously raised in representations and/or during the hearing sessions. In response, the Council refers to its statements made previously and the discussions at the hearings. In particular, the Inspector should note:

- 1) In relation to concerns regarding intensification of existing sports fields, the Council has set out its position in CED 011 – question (vii) – paragraphs 7.1 – 7.4, and CED009 – question (viii) – paragraphs 8.1 – 8.2;

- 2) In relation to concerns over quality the Council has set out its position in CED 011 – question (iv) – paragraphs 4.1 – 4.10, and CED009 – question (vi) – paragraphs 6.1 – 6.10; and
- 3) In relation to concerns regarding funding and maintenance the Council has set out its position in CED 011 – question (vi) – paragraphs 6.1 – 6.4, and CED009 – question (vii) – paragraphs 7.1 – 7.3.

The Council recognise that there are actions in the Playing Pitch Strategy Action Plan which need to be undertaken/ actioned in due course should either or both sites come forward for potential redevelopment. In recognition of this, the Council has specifically phased both Fords (phase 2 and phase 3) and Oakfield (phase 3) in latter phases of the plan period to ensure there is sufficient time to enable specific actions to be undertaken before sites are potentially redeveloped in accordance with Local Plan Policy LP35.

Impact of deleting Oakfield and Ford Sports Ground as Opportunity Sites from the Local Plan

As set out in CED055 (Sport England comments on doc CED050), Sport England maintain that both Oakfield Playing Field and Ford Sports Ground should be retained for sport and recreational use, rather than identified as Development Opportunity Sites in the Redbridge Local Plan.

The Council recognises the importance of sport and recreation provision, and reiterates that proposals in the Local Plan (i.e. Policy LP35) secure the re-provision of existing pitches and facilities to a suitable location within the borough before any development of the Oakfield and Ford sites takes place. It has also been demonstrated through document CED050 (Playing Pitch Provision in Different Scenarios) that there will be sufficient playing pitch provision for cricket and football in the borough to meet demand in 2030, if either or both sites come forward for development.

Providing for sport and recreation needs is one of many competing issues that the Local Plan seeks to address, and removing both sites as Development Opportunity Sites would have major implications for the borough.

In terms of housing numbers, removing both sites will reduce the borough's housing supply from 18,702 dwellings (including windfall) to

17,237 (including windfall). This represents a significant loss in housing supply, and will further increase the gap between identified supply and the borough's full Objectively Assessed Needs of 31,977 (identified in LBR2.01 – North East London Strategic Housing Market Assessment).

Removing both sites will also reduce the delivery of family sized homes (i.e. 3 bed+) in the borough, which document LBR2.01 identifies a significant need for. Policy LP5 (as modified) specifies that Oakfield and Ford Sports Ground, alongside other Green Belt release sites, are expected to meet the Council's preferred dwelling mix to help address this strategic need. Such sites offer a unique opportunity in the borough to provide a high proportion of family sized units, and document LBR2.78 (Concept Masterplans for Green Belt Release Sites) demonstrates that this is achievable.

In terms of infrastructure needs, removing both sites will result in a need for two additional sites for secondary schools to be found in the borough; to compensate for the loss of provision earmarked for each site. Planned provision at each site is required to meet needs arising from borough wide population growth, and is therefore required independent of the level of housing proposed at each site. Furthermore, alternative proposals for new primary healthcare provision in the Fairlop Locality will also be required to compensate for the loss of the facility planned at Oakfield.

All reasonably available brownfield land has already been identified to meet the borough's development needs, and the Sustainability Appraisal (LBR1.11 and 1.11.2) has identified negative impacts of further town centre intensification. Deleting both sites from the Local Plan would therefore necessitate the release of further Green Belt to enable the borough to meet its development needs, including need for infrastructure, as referred to above. As the Local Plan is already proposing to release all sites that do not meet NPPF Green Belt purposes (as informed by LBR2.41.1 – Green Belt Review Addendum), any further release of land within the Green Belt that does contribute to Green Belt purposes would therefore compromise the role and effectiveness of remaining Green Belt. Negative consequences of further Green Belt release have also been identified through the Sustainability Appraisal (LBR1.11 and 1.11.2).

Finally, attention is also drawn to the Council's responses to CED009 question (iii) and CED011 question (xi) and (xii), which set out how both sites can contribute to a sustainable pattern of development. Alternative

sites, in addition to meeting Green Belt purposes, are unlikely to offer such benefits.