

LONDON PLAYING FIELDS FOUNDATION

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Head of Property Services  
Atten: Jack Garrod  
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London Borough of Redbridge  
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Essex IG1 1NN

**Notice under Section 123 (2A)  
Local Government Act 1972  
Disposal of Open Space**

16<sup>th</sup> October 2023

Dear Mr Garrod,

The purpose of this letter is to provide London Playing Field Foundation support to Bealonians FC in their continued management and operation of the Jack Carter Pavilion and associated playing pitches which it has undertaken since 2004. We oppose in the strongest possible terms the London Borough of Redbridge recommendation to effectively evict a well-run, long-standing grassroots club that serves the local community so brilliantly and enter into a long leasehold agreement for the land and pavilion at Oakfield Playing Fields with a professional club (West Ham United FC) from the London Borough of Newham as a new site for its academy.

Following a request from LB Redbridge in April 2020 to “look after the premises” during the pandemic, Bealonians FC assumed the management and operation of the pavilion and playing field so there is little doubt as to its adaptability and civic duty. The club has clearly proved its worth as a responsible and proactive guardian of this strategic playing field and, as it seeks to retain the above site as playing fields for use by the local community, we believe that with its local knowledge, expertise and experience, Bealonians’ lease should be extended for the foreseeable future. If the club lost the contract for the lease of the facilities it would have a hugely negative impact on sports participation in the borough without any alternative site identified.

For the record, Bealonians FC run 29 teams (ten adult, seventeen youth and two girls) and the two cricket squares provide a home for Aztecs, Bardoli, Spartans, Scintilla and Essex Panthers cricket clubs. West Ham United FC will not be catering for the hundreds of players displaced by their arrival. Their focus will be on elite young players with the potential to make the 1<sup>st</sup> Team or be sold for large sums and of course the two cricket pitches will disappear.

The rationale for granting a lease to West Ham United FC is for the site to become income generating and to create jobs in the area. Bealonians FC might not be paying a rent for the use of the ground, but the economic impact of the social and health benefits will save the Council millions. However much West Ham United are paying, it won’t match the savings to

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the public purse that Bealonians produces. As for the potential to create new jobs, this seems like a spurious argument given that the academy already has a full complement of coaching and grounds staff at Little Heath.

Playing pitches are important as recreational and amenity features and provide open space in both urban and rural landscapes for the enjoyment of all within the community. Their development for purposes other than open access recreation has serious repercussions, not only through the reduction of leisure facilities and the resulting increase in pressure on those remaining, but also in the limited access that will be offered by the new provider. We believe that the potential loss of these facilities to a commercial provider will have a serious impact on opportunities for public access to a well-managed community resource.

Note 5.16 of the Council's Report states that the "release of the Little Heath site provides an opportunity to enable potential housing development". This assumption surely contravenes the site's MOL status and goes against GLA and national planning policies.

Finally, the Council's plans for this well managed playing field seem to contradict the key principles outlined in the Playing Pitch Strategy and Local Development Framework.

### **London Borough of Redbridge Playing Pitch Strategy 2015**

The aim of the LB Redbridge Playing Pitch Strategy that follows Sport England principles is to ensure there is no overall loss of playing pitches in the borough over the Local Plan period to 2030 by providing the right playing pitch facilities in appropriate places to meet the identified needs of playing pitches for football, cricket, rugby union and hockey to ensure correct maintenance of the current playing pitch provision and to plan for the future needs of the population.

Overall the PPS recommends focusing on the following three principles:

- **PROTECT:** The strategy seeks to make sure that the right amount of playing pitches and ancillary facilities of the right quality are in the right place. It promotes the protection of existing provision and recognises the benefits of multi pitch sites.
- **ENHANCE:** Key partners such as LB Redbridge, Vision, local schools, Private and Voluntary Sports Clubs, and NGBs must work together to maximise the full potential of playing pitch assets and the long term sustainability of these assets and recognizes that an improvement in quality and ongoing maintenance can have an impact on the capacity of use.
- **PROVIDE:** In times of public sector austerity, investment needs to be directed at sites which will provide the best impact and highest increase in participation.

One of the key issues identified in the PPS is to **ensure sustainability of junior clubs by providing long term security of playing facilities**, allowing junior clubs to grow and develop; and investigating and investing in multi pitch hub sites. Exactly what Bealonians are seeking to do.



Key priorities identified in the PPS include:

- (i) Protection of all community use and informal community use pitches across LB Redbridge.
- (ii) Ensure sustainability of junior clubs and investigating and investing in multi pitch hub sites with 3G rubber crumb pitches.
- (iii) All football pitches in the Borough should be protected unless suitable equivalent or better replacements are provided.
- (iv) Ensure clubs have appropriate levels of security of tenure to secure their long term future.

It is the policy of LB Redbridge to support projects and sports clubs that are able to demonstrate sustainable long term development; to increase participation; and to support those clubs that have achieved the appropriate accreditations e.g. Clubmark and or Charter Standard and which provide player and sports development pathways.

### **London Borough of Redbridge Local Development Framework 2019**

Within the Council's existing Local Development Framework there are borough wide policies relating to culture and sport. These include:

#### CR3 Sport Leisure and Cultural Facilities

Planning permission for any change of use involving the loss of existing indoor and outdoor sport, leisure and cultural facilities will only be granted where the applicant clearly demonstrates that there is no longer a need for that facility and that there are sufficient similar facilities in the nearby area.

#### CR4 Provision of Open Space

Planning permission will be granted for new development where it incorporates appropriate open space and landscaping. This may include other leisure and recreation facilities, including play space for children, appropriate to the scale and nature of the proposal. Where this cannot be achieved within the site, developers will be required to make a contribution towards off-site provision. Guidance is set out in the Planning Obligation Strategy Supplementary Planning Document regarding the provision or enhancement of nearby facilities.

In partnership with other provider organisations, the Council will safeguard existing facilities for community use. Planning permission for a change of use involving the loss of community facilities will only be granted where the applicant clearly demonstrates that there is no longer a need for that facility and where there are sufficient similar facilities nearby. The proposals from West Ham United FC to locate their academy on the site will not support the community use that is currently facilitated by Bealonians FC.

### **National Planning Policy Framework**

These points are also reinforced in the Government's National Planning Policy Framework (NPPF) that makes the need for such consideration clear in its requirements to:

- deliver community and cultural facilities to meet local needs



- protect existing sports and recreational buildings and land
- guard against the unnecessary loss of valued facilities and services
- promote mixed developments
- plan positively to provide opportunities for outdoor sport in the Green Belt
- ensure that decisions are based on robust and up-to-date assessment of need.

The protection and provision of opportunities to participate in sport is fundamental to the health and well-being of communities (NPPF, section 8), meaning that local authorities must plan and provide accordingly through local planning policy and development management.

The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

In achieving Sustainable Development there are three dimensions: economic, social and environmental. These dimensions give rise to the need for the planning system to perform several roles:

- an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being;
- an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

Furthermore, Paragraph 99 of the National Planning Policy Framework makes it very clear on what grounds a playing field can be built on, namely:

*“Existing open space, sports and recreational building and land including playing fields should **not** be built on unless:*

- *An assessment has been taken which has clearly shown the open space, buildings or land to be surplus to requirements or*
- *The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quality and quantity in a suitable location or*



- *The development is for alternative sports and recreation provision, the needs of which clearly outweigh the loss.”*

The Government’s National Planning Policy Framework (NPPF) is clear about the role that sport plays in delivering sustainable communities through promoting health and well-being. Protecting, enhancing and providing opportunities to participate in sport is fundamental to creating sustainable communities and the proposed new lease arrangements for the sports facilities at Oakfield Playing Fields would not comply with national policy.

Paragraph 93 *“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs”*

The proposal for the new lease at Oakfield Playing Fields fails to address paragraphs 93 and 99 of the NPPF that also place great emphasis on the *protection of existing sporting facilities*.

### **LPFF Role**

London Playing Fields Foundation (LPFF) is a registered charity founded in 1890 and granted a Royal Charter in 1925. It is the main charity for the provision, protection and promotion of playing fields in London and over the past 133 years LPFF has built up a great deal of knowledge and operational experience in running sports grounds and providing a range of sports development opportunities. We operate seven playing fields across the capital and continue to work with and provide advice to a variety of strategic organisations including Sport England, GLA, and Local Authority partners, National Governing Bodies of Sport, London Marathon Foundation, Football Foundation and various area Health Trusts.

By adopting a strategic approach, we advocate the need for better protection of playing fields to safeguard them for future generations of Londoners and are working with a range of key partners to reverse the cycle of playing fields decay. In this instance we have worked with Bealonians FC in the past when securing the wider Oakfield Playing Fields for continued sports activity.

LPFF has a policy position of “no net loss of playing pitches” and advocates the general presumption against the development, disposal or change of use of playing fields. Once a field is lost it is lost forever.

As a principle, there should be no net loss of pitches and no reduction in the amount of pitches available for use either for sport or informal recreation. Under use of a playing field should not necessarily be viewed as an indication of absence of need in the local area. We also argue that if a playing field is lost to development it should be replaced by a playing field or fields of equivalent or better quantity and quality and in a suitable location. There does not appear to be an alternative site identified for Bealonians.



In order to address this issue LPFF has been compiling a continuously updated Fields at Risk Register (FARR), a type of early warning system that catalogues the details of playing fields where the local community has expressed concern about their short to medium term future. Once included on the register, LPFF puts in place a three-stage package of support for the local people who are advocating on the behalf of the playing field. This package might involve one of the following:

- Providing one to one advice to organisations resisting the potential loss of a local field or
- Providing more detailed consultancy advice to organisations resisting the potential loss of a local field or
- Acquiring the ground on a freehold or long lease basis

LPFF contends that there is a real need for a system that supports the long-term protection of playing fields by:

- Providing local intelligence on the sites under threat
- Responding to and providing practical advice to local community groups and organisations, opposing the potential loss of the ground.

### The importance of Playing Fields for London

This was highlighted in *A natural capital account for London's public open spaces* which revealed that:

- London's public green space have a gross asset value more than £91 billion, providing services valued at £5 billion per year
- For each £1 spent by local authorities and their partners on public green space, Londoners enjoy at least £27 in value
- Londoners avoid £950 million per year in health costs due to public green space.
- The value of recreational activities is estimated to be £926 million per year
- For the average household in London, the monetary value of being near a green space is over £900 per year.

In addition, the Sport and Recreation Alliance estimate that Bealoniens generate £808,496 in social value to Redbridge through wellbeing, mental health and reduction in NHS costs.

### Sport England

Sport England as the government agency responsible for building the foundations of sporting success has itself adopted a 'Playing Fields Policy', which seeks to resist the loss of playing fields. It aims to ensure positive planning for sport, enabling the right facilities to be provided in the right places, based on robust and up-to-date assessments of need for all levels of sport and all sectors of the community.

Through its planning objectives it seeks to **protect** sports facilities from loss because of redevelopment; to **enhance** existing facilities through improving their quality, accessibility



and management; and to **provide** new facilities that are fit for purpose to meet demands for participation now and in the future.

It promotes a planned approach to the provision of facilities and opportunities to participate in sport, in doing so adds value to the work of others in helping to deliver sustainable development goals through:

- recognising and taking full advantage of the unique role of sport and active recreation in contributing to a wide array of policy and community aspirations, including leisure, health and education.
- using sport and recreation as a fundamental part of the planning and delivery of sustainable communities
- the development of partnership working using sport and active recreation as a common interest.

To achieve this aim SE will seek to protect sports facilities from loss as a result of development and since 1995 has been a statutory consultee on planning applications affecting playing fields. From 1998 local planning authorities have also been required to refer to the Secretary of State any planning applications affecting playing fields which they wish to approve contrary to SE advice.

Sport England's view is that any potential loss may also result in the substitution of other indoor facilities but whilst this may be recognised as a viable alternative, it should not replace the loss of a grass pitch.

It is committed to the creation of a world-leading community sport system by focusing investment on organisations and projects that will grow and sustain participation in grassroots sport and create opportunities for people to excel at their chosen sport. For this to happen it needs playing fields and appropriate ancillary facilities. It has a key planning role in the protection and improvement of playing fields as well as providing capital funding through Lottery Funding and indirectly through governing body Whole Sport Plans.

To ensure that informed decisions can be made by local authorities on the future of a playing field, Sport England believes that all local authorities within England should have an up to date playing pitch strategy, either as a stand-alone document or forming part of a wider open space strategy. This not only seeks to ensure that an assessment of need is carried out, but also that a strategy is put in place in terms of improving accessibility and quality of pitches.

## Conclusion

It is clear that the local community opposes the scheme and as advocated in the National Planning Policy Framework local neighbourhood opinion should be sought in determining the local need. There is significant local opposition to Bealoniens FC's loss of tenure and a strong consensus that it should be retained for sport and recreation purposes for the wider community. LPFF's position is clear. It would wish the site to be retained and used for sport and recreation purposes as opposed to other uses that would restrict open access and for this reason the club have the full support of LPFF.

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One of the main reasons why playing fields are under resourced, and therefore vulnerable, is due to the very low appreciation of their potential to contribute to council corporate objectives. We believe that during their tenure Bealonians FC has continued to improve opportunities for sport and recreation that benefit the local community and in seeking to extend its lease, we believe that the site will contribute to widening, increasing and sustaining participation in sport and physical activity into the future.

Finally, given its role in managing and maintaining the site during the pandemic, the club has demonstrated its role as a true guardian of this playing field and therefore it has our full support.

Yours faithfully

**Alex Welsh**  
**Chief Executive**

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