

Date: 8/09/2017

**Richmond Local Plan – Publication Version for Consultation & Proposals
Map Changes (Jan-Feb 2017)**

**Further Statements and confirmation of participation in the Examination
Hearings**

Sport England representations

Thank you for inviting Sport England to submit a further statement regarding the above.

Sport England confirms that it will appear at the inquiry.

Policy – Response to Planning Inspector's questions

5. Is the approach to public open space, play space, sport and recreation justified by a sufficiently robust evidence base?

- *How have current open space provision and needs been assessed? What up to date evidence supports the approach and is it consistent with national planning policy?*
- *Are the requirements of criteria B justified and have they been assessed for their effect on development viability?*
- *Is Sport England satisfied with the approach of the Plan towards sport and recreation?*

In making representations on development plans Sport England's Policy states that we will seek development plan policies that achieve the following;

- 1) To prevent the loss of sports facilities and land along with access to natural resources used for sport.
- 2) To ensure that the best use is made of existing facilities in order to maintain and provide greater opportunities for participation and to ensure that facilities are sustainable.
- 3) To ensure that new sports facilities are planned for and provided in a positive and integrated way and that opportunities for new facilities are identified to meet current and future demands for sporting participation.

Sport England comments - Policy LP31 and supporting text

The Council has prepared and adopted a Playing Pitch Strategy, following Sport England's guidance to provide an evidence base for the Local Plan. It is understood that the Council intends to update this shortly, as recommended within our guidance. The Council has also prepared an assessment for indoor sport. Sport England confirms that the Council has prepared an adequate evidence base to inform the development plan and that this supports the Council's intention to protect existing sports facilities.

The Playing Pitch Strategy contains several policy recommendations including;

- Ensure, through the use of the Playing Pitch Strategy, that sports facilities are protected through the implementation of local policy
- Secure developer contributions
- Rectify quantitative shortfalls in the current pitch stock
- Identify opportunities to add to the overall stock of pitches to accommodate both current and future demand

Sport England supports the Council's statement in section 'A' of the policy that playing field land will be protected from development and where possible enhanced.

Sport England further welcomes the references within the supporting text to paragraph 75 and paragraph 8.4.17 and 8.4.18.

However, Sport England would prefer the Council to have additional text within Policy LP31 that specifically protects playing field and sport and recreation uses from development, where they are located on site allocations.

Sport England is concerned that where there are existing playing field and built sports facilities on some major development sites (including site allocations SA24, SA8, SA9 and SA14) it should be made clear in the plan's policies that any existing facilities and playing fields will be protected, as a need to retain these facilities is evidenced by the assessments prepared for the Borough's evidence base (the Playing Pitch Strategy and the Indoor Sports Facility Needs Assessment). I have also suggested in my comments on site allocations below changes to the policy that could help protect these existing facilities and provide further clarity for applicants.

Where there are new development sites which do not include existing facilities, there is also a need to provide contributions that will help meet the sporting needs identified within the Playing Pitch Strategy and the Indoor Sports Facility Needs Assessment

Suggested additional text for section B;

***'Playing fields and sport facilities:** Where on-site provision of new playing fields and ancillary facilities cannot be provided to support new development on site then a contribution towards off-site provision should be made to help meet the needs identified in the Council's playing pitch strategy.*

Sport England further supports the Council's acknowledgement in paragraph 8.4.19 that private sports facilities are important to help meet the Borough's wider sporting needs. National Planning Policy seeks to protect existing sports facilities whether they are in public or private ownership.

8.1 Social and Community Infrastructure – Policy LP28 and supporting text

Sport England considers that further changes are required to Policy LP28 to protect indoor sports facilities from development and ensure that any

development proposals contribute towards meeting the needs identified in the Council's evidence base for indoor sports facilities.

Paragraph 74 sets out specific criteria for the protection of all sports facilities. These are;

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

- *an assessment has been undertaken 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 equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

The criteria set out in 'C' and 'D' of the Council's policy are therefore not appropriate for the loss of built sports facilities, which have additional protection in National Policy in comparison to other community facilities. It is therefore recommended that an addition to Policy LP28 is made to cover this such as;

New policy text;

Loss of built sports facilities

The loss of sports and recreational buildings, in particular, will be resisted. The Council's Indoor Sports Facility Needs Assessment (2015) highlights the need for new facilities within the Borough and does not indicate that any existing facilities are surplus to requirements. Existing indoor sports facilities in the Borough should not be built on unless:

- *an assessment has been undertaken 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 equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

With regard to new development, it is suggested that the following text is added to 'E';

'Where possible, new sports facilities should be provided on site to meet demand arising from new development. If provision cannot be made on site, an off-site contribution towards existing or new off-site provision will be made to meet the needs identified within the Borough's Indoor Sports Facility Needs Assessment.

Sport England welcomes those commitments within the site allocations (such as SA22) towards improving sports facilities but we would also like the Council to reference its evidence base documents within the plan and provide a commitment to delivering the improvements identified within these strategies to meet the needs of existing and future residents.

Site Allocations – Response to Planning Inspector’s questions

Q1. Stag Brewery

SA24 – is the allocation justified by the evidence base with due regard to alternatives and in particular:

- *The accessibility of the site;*
- *The need for a secondary school;*
- *The capacity of the site for mixed use development including housing;*
- *The presence and use of the sports field;*
- *The presence of heritage assets;*
- *The deliverability of the redevelopment.*

Sport England supports the policy text that includes the retention and/or re-provision and upgrading of the playing field.

It would be helpful to the developer of this site if the Council would confirm in the text that the playing field on site will be re-provided in accordance with paragraph 74 of the NPPF. This should mean that all of the existing playing field area and any ancillary changing provision is protected from development or replaced within the site.

Q4. Pools on the Park and surroundings, Old Deer Park, Richmond

SA22 – is the allocation justified by the evidence base?

Are the heritage assets and presence of MoL recognised adequately?

Sport England supports the Council’s intention to improve the sports facilities at this important community asset, which is supported by the outcomes of the Indoor Sports Facility Needs Assessment.

Q5. Richmond Athletic Association Ground, Old Deer Park, Richmond

SA23 – is the allocation justified by the evidence base with due regard to the presence of MoL and the consideration of alternatives?

Sport England supports the Council’s intention to continue the use of this site for sports uses, including improvements and upgrading of existing facilities.

Other site allocations

Sport England has the following further comments regarding the objections we have submitted regarding the other site allocations/designations;

Local Green Space Designation – 2.2

Sport England supports this Local Greenspace designation. The NPPF states that playing fields can be identified as local greenspace, where they are identified as important by the community and the Council. This site is also listed as an Asset of Community Value and the additional designation will provide further support to help this site to come back to the community.

The Council's Playing Pitch Strategy recommends the retention of this site and the Football Association and the England & Wales Cricket Board have confirmed that they support the retention of this playing field for the community.

SA 8 St Mary's University, Strawberry Hill

Sport England has objected to allocation SA8 of the development plan as there are playing fields and sports facilities present on the St Mary's site and it has not been made explicitly clear that these will be protected from development.

Sport England would withdraw its objection to this allocation if the following text is added to the bullet points accompanying the policy.

- The existing playing fields and athletics track and ancillary facilities on the site will not be built upon and retained within the site.
- OR the hatching over the playing fields, athletics track and ancillary facilities is removed from the site allocations plan.
- OR the Council identifies a site to accommodate replacement facilities for any sports facilities that are proposed.

SA 9 Richmond upon Thames College, Twickenham

Sport England objected to planning application 16/4747/RES which resulted in the loss of the playing field in the northern section of the site. Sport England therefore withdraws its objection to this part of the policy on the basis that a planning decision to lose the playing field to the north has already been made. Albeit, Sport England objected to this application and it is not clear whether or not this application was subsequently referred to the Secretary of State. Until this matter is resolved, Sport England upholds its objection to the loss of playing field to the north of the site.

Sport England supports the upgrading of the playing field to the south of the college site. However, Sport England would not wish any further playing field land to be lost from the site. To ensure this Sport England requests the following bullet point or similar is added to the text;

- The existing grass playing fields to the south of the site will be retained for sports use and will accommodate a new artificial sports pitch.

SA 10 The Stoop (Harlequins Rugby Football Club), Twickenham

Sport England has reviewed its representation and wishes to remove its objection to this policy.

SA 11 Twickenham Stadium, Twickenham

Sport England has reviewed its representation and wishes to remove its objection to this policy.

SA 14 Kneller Hall, Whitton

Sport England's previous representations incorrectly refer to Policy SA15.

Sport England supports the Council's intention to retain the playing fields in this location. Sport England requests that the following bullet point is amended to ensure that the playing field is retained and ancillary facilities are provided;

- ~~It is expected that the existing playing field will be retained and where possible upgraded, provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced.~~
- The existing playing field should be retained and upgraded with ancillary facilities, such as changing provided to support the use of the playing fields.

It is not clear what the 'existing ecological benefits' could be and whether or not this would prevent the continued use of the playing field. If an area is required to be set aside for nature conservation, then this should be made clear in the policy.

SA16 Cassel Hospital, Ham Common, Ham

Paragraph 74 of the NPPF states that existing sports facilities should be protected. It is recommended that the tennis courts on sites are retained for the new users or replaced with a Multi-Use Games Area for community use.

Other sites of Nature Importance

Designation of the Rifle Range, Twickenham as OSNI.

Sport England notes that the Council intends to designate the rifle range as an OSNI. It is not clear if the rifle range is still in use by a local rifle club. If the site is still used as a rifle range Sport England would query whether the designation of this site is appropriate or if the designation of this site would prevent continued sporting use on the site?