

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground – London Borough of Richmond upon Thames and Sport England

Sport England, in their Further Statement dated 8 September 2017, made a number of comments and suggested modifications.

This Statement of Common Ground sets out the areas of agreement between the London Borough of Richmond upon Thames and Sport England, and proposes resulting minor changes and modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties.

Text proposed to be inserted in **bold underlined**

Text proposed to be removed in ~~red strikethrough~~

Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
Policy LP 28	<p>Changes are required to LP 28 to protect indoor sports facilities and ensure any development proposals contribute towards meeting the needs identified in the Council’s Indoor Sports Facility Needs Assessment.</p> <p>Suggested text as new Part E: <u>“E. 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</u></p>	<p>The Council does not consider it necessary to repeat the NPPF within the Local Plan policy, as the tests in Policy LP 28 are considered consistent with the approach in the NPPF. LP 28 covers a range of social infrastructure and is considered sufficiently robust to protect existing uses where needed. It does not distinguish between different types of uses as these needs can vary over the Plan period. Therefore, the policy always looks to the latest evidence base on local needs and priorities.</p> <p>It is however acknowledged that Sport England is seeking more recognition of the need to protect indoor sports facilities, in line with the Council’s evidence base, and that a loss of such facilities should be assessed against the criteria in the NPPF. Therefore, a new paragraph after 8.1.8 is proposed to</p>	N/A	Not agreed

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	<p><u>Borough should not be built on unless:</u></p> <ul style="list-style-type: none"> • <u>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</u> • <u>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</u> • <u>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</u> <p>With regard to new development, it is suggested that the following text is added to existing Part E: <u>“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.”</u></p>	<p>deal specifically with new indoor sports facilities and the Needs Assessment: <u>“The Council’s Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council’s Indoor Sports Facility Needs Assessment.”</u></p> <p>In addition, a new paragraph is proposed after 8.1.10 to deal specifically with the potential loss of such facilities: <u>“Proposals that could affect the loss of an existing indoor sport facility will also be assessed against the Council’s Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.”</u></p> <p>In relation to the suggested additional text for existing Part E, it is not considered appropriate for every major development to assess the potential effects of the proposal and to meet demands arising from new development. It is however considered that the additional new paragraph after 8.1.8 covers this sufficiently.</p>		
Policy LP 31	Sport England confirms that the Council has prepared an adequate evidence base to inform the development plan, i.e. a	Support noted.	N/A	Agreed

Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
	Playing Pitch Strategy and an Assessment for Indoor Sport.			
Policy LP 31 – Part B	<p>Where there are new development sites which do not include existing facilities, these is also need to provide contributions that will help meet the sporting needs identified within the Playing Pitch Strategy and the Indoor Sports Facility Needs Assessment.</p> <p>Suggested additional text:</p> <p><u>“Playing fields and sport facilities:</u></p> <p><u>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. “</u></p>	<p>As Policy LP 31 deals specifically with outdoor facilities (and LP 28 applies to indoor sport facilities), the Council would be amenable to the following changes:</p> <p>Amend first sentence of Part B as follows: B. The Council will require all major development proposals in the borough to meet the Public Open Space, and play space, <u>and playing fields and ancillary sport facilities needs</u> arising out of the development by requiring the following:</p> <p>Add new criterion 3 of Part B as follows: <u>“3. Playing fields and sport facilities: Applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough’s Playing Pitch Strategy.”</u></p> <p>Amend criterion 3 of Part B as follows: 3.4. <u>4.</u> Where on-site provision of Public Open Space, or play space <u>or new playing fields and ancillary facilities</u> is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space <u>or existing playing fields and associated sport facilities</u>. Financial contributions</p>	To ensure the needs as set out in the borough’s Playing Pitch Strategy are addressed.	Agreed

Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
		will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development.”		
Policy LP 31 – paragraphs 8.4.16 to 8.4.18	<p>Sport England would like to see additional text that specifically protects playing field and sport and recreation uses from development where they are located on Site Allocations.</p> <p>Sport England remains concerned that further protection is required in respect of some Site Allocations; see further comments on the Site Allocations below.</p>	<p>Part A of the policy seeks the protection of all playing fields. This is supported by paragraph 8.4.16 which outlines the outdoor sport and recreation facilities that this policy applies to.</p> <p>The purpose of this policy is to set out the principles, i.e. the protection of all playing fields, pitches and recreational areas etc. Therefore the Council does not consider it necessary to refer to the Site Allocations specifically within the supporting text. This is because the assumption is that all policies within the Local Plan and any other relevant adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan (also see paragraph 12.1.6 of the Plan).</p> <p>Also note the changes proposed to the relevant Site Allocations (below).</p>	N/A	Agreed
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	<p>Sports playing fields are referred to within existing bullet point 4 of the supporting text¹.</p> <p>The Council proposes the following change:</p>	For clarification	Agreed

¹ Note that in the Statement of Common Ground with GLA on behalf of the Mayor of London (7 September 2017) (LBR-LP-009), it was agreed to move the last sentence of the 4th bullet point to the beginning of the 5th bullet point.

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	<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>Insert new bullet point within the supporting text (after the 5th bullet point) as follows: <u>“The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site.”</u></p>		
SA 9 Richmond upon Thames College, Twickenham	<p>Sport England withdraws its objection 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.</p> <p>Sport England requests the following bullet point or similar is added to the text: <u>“The existing grass playing fields to the</u></p>	<p>Outline planning permission was granted on 16 August 2016 (15/3038/OUT) and the Secretary of State has not intervened in this decision.</p> <p>In relation to the playing field to the south, it should be noted that the main policy already refers to it, but a minor change could be accommodate as follows: <u>“Protection and upgrading of the playing field to the south of the college, including the installation of a new artificial grass (3G) playing pitch.”</u></p>	To provide clarity regarding the need to protect and upgrade the playing field to the south.	Agreed in relation to the minor change proposed by LBRuT


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	<u>south of the site will be retained for sports use and will accommodate a new artificial sports pitch.”</u>			
SA 10 The Stoop, Twickenham	Sport England removes its objection.	Noted.	N/A	Agreed
SA 11 Twickenham Stadium, Twickenham	Sport England removes its objection.	Noted.	N/A	Agreed
SA 14 Kneller Hall, Whitton	<p>Sport England supports the Council’s intention to retain the playing fields, but requests that existing bullet point 6 is replaced:</p> <ul style="list-style-type: none"> 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. <u>The existing playing field should be retained and upgraded with ancillary facilities, such as changing provided to support the use of the playing fields.</u> <p>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.</p>	<p>The Council would consider the following change appropriate:</p> <ul style="list-style-type: none"> It is expected that the existing playing field will be retained and where possible upgraded, <u>such as with ancillary facilities, including changing provided to support the use of the playing fields,</u> provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced. <p>It is considered important to retain references to MOL as well as existing ecological benefits. In relation to ecological benefits, there are a significant number of Tree Protection Orders (TPO) on this site, as well as groups of TPOs that will need to be retained and protected. The policy does not set out specific requirements for an area to be set aside for nature conservation purposes. A Masterplan / site development brief SPD will be developed for this site, and further options for the redevelopment of this site</p>	For clarity and to address Sport England’s comments in relation to ancillary facilities.	Agreed in relation to the minor change proposed by LBRuT

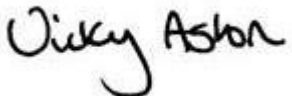
Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
		will be looked at and considered as part of this future work.		
SA 16 Cassel Hospital	Paragraph 74 of the NPPF states that existing sports facilities should be protected. It is recommended that the tennis courts on sites are retained for the new users or replaced with a Multi-Use Games Area for community use.	Cassel Hospital, part of the West London Mental Health Trust, provides treatment for adults with severe and complex personality disorders and young people with emerging personality disorders. The tennis courts on this site are specifically for use by in-patients of this facility and are not available for use by the wider public. Therefore, they have not been considered or taken account of as part of the borough's Playing Pitch Strategy (PPS). Indeed, the PPS found generally good provision of good quality tennis courts across the borough. The PPS only identified some issues in relation to maximising use of courts and play in winter months rather than the provision of new facilities/courts to meet needs. It is therefore not considered appropriate or necessary to include the recommended.	N/A	Agreed
SA 22 Pools on the Park and surroundings, Richmond	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.	Support noted.	N/A	Agreed
SA 23 – Richmond Rugby and Richmond Athletic Ground	Sport England supports the Council's intention to continue the use of this site for sports uses, including improvements and upgrading of existing facilities.	Support noted.	N/A	Agreed
SA 24 – Stag Brewery, Lower	Sport England supports the policy text that includes the retention and/or re-provision	Support noted. It is not considered necessary to refer specifically to	To avoid confusion and	Agreed

Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
Richmond Road, Mortlake	<p>and upgrading of the playing field.</p> <p>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.</p>	<p>the NPPF within the Site Allocation because the assumption is that all policies within the Local Plan and any other relevant adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan (also see paragraph 12.1.6 of the Plan).</p> <p>It should be noted that the Council has proposed a minor modification to address the point that re-provision would have to be on-site by amending the 10th bullet point of the supporting text as follows: "Links through the site, including a new green space and high quality public realm link between the River and Mortlake Green, provides the opportunity to integrate the development and new communities with the existing Mortlake community. <u>This includes the retention and/or re-provision and upgrading of the playing field within the site.</u>"</p>	to add clarity	
Proposals Map Changes – Local Green Space designation for Udney Park Playing Fields	<p>Sport England supports this Local Greenspace designation. The NPPF states that playing fields can be identified as Local Green Space, 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.</p> <p>The Council's Playing Pitch Strategy</p>	Support noted.	N/A	Agreed

Policy / Section / paragraph	Sport England Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
	<p>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.</p>			
<p>Proposals Map Changes – new Other Site of Nature Importance (OSNI) for Rifle Range, Twickenham</p>	<p>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.</p>	<p>The Rifle Range is still in use (http://www.twickenhamrpc.co.uk, with opening hours on Wednesdays from 19.30-21.30 and Sundays from 12.30-15.30). There is no public access to the Rifle Range, and it is a relatively undisturbed and unmanaged area with corridors in vegetation kept clear for shooting purposes. It is considered that due its location next to the River Crane, it is appropriate to designate it as OSNI. In addition, the proposed OSNI designation would not lead to any changes to the site and how it operates, with both indoor and outdoor ranges in use; it would also not prevent or cause any future conflicts with the continued sporting use on the site. Therefore, the Rifle Range as well as the OSNI designation can co-exist.</p>	<p>N/A</p>	<p>Agreed</p>

Both parties consider that these amendments address the concerns raised by Sport England in their representations and their written statements on the **London Borough of Richmond upon Thames – Local Plan Examination 2017**

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Policy and Design Team Manager London Borough of Richmond upon Thames		21 September 2017

Signed on Behalf of Sport England		
Name and Position	Signature	Date
Vicky Aston Planning Manager Sport England		21 September 2017