

Osman, Louis

From: Laura Hutson [REDACTED]
Sent: 02 March 2022 15:56
To: Kitzberger-Smith, Andrea; PlanningPolicy Wandsworth
Subject: FW: Wandsworth Reg 19 Local Plan

Dear Andrea,

Many thanks for allowing Sport England to respond to this consultation and sincere apologies that it is a couple of days late.

Sport England has reviewed Wandsworth’s Regulation 19 Local Plan and would like to reiterate the points made previously (below) as it is considered that the majority of those still stand.

In particular, it is of concern that policy LP54 (previously LP56) is not compliant with the NPPF, as any ‘replacement’ of lost playing field with access to previously private playing field is still considered a net loss of playing field. Sport England objects to this policy as it is not compliant with national policy.

Sport England is also concerned that the policy does not mention the need to take a robust and up to date assessment of sport provision into account when determining whether facilities are surplus to requirements (again, as per the NPPF). Ideally the policy should refer to the relevant documents which I understand are now complete and due to be adopted this year – the Wandsworth Playing Pitch Strategy and Built/Indoor facilities strategy. This will allow both potential applicants and DM officers to easily refer to them when making or assessing planning applications.

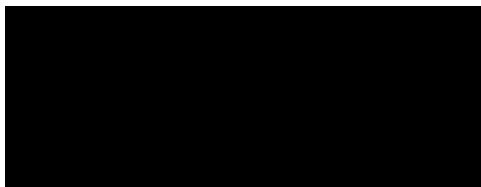
Finally I note that Springfield hospital site is now included in the Site Allocations. I note that the site allocation makes reference to the proposed public park which will provide activities for all age groups. Sport England would request that this site allocation also makes reference to sport being provided on this site.

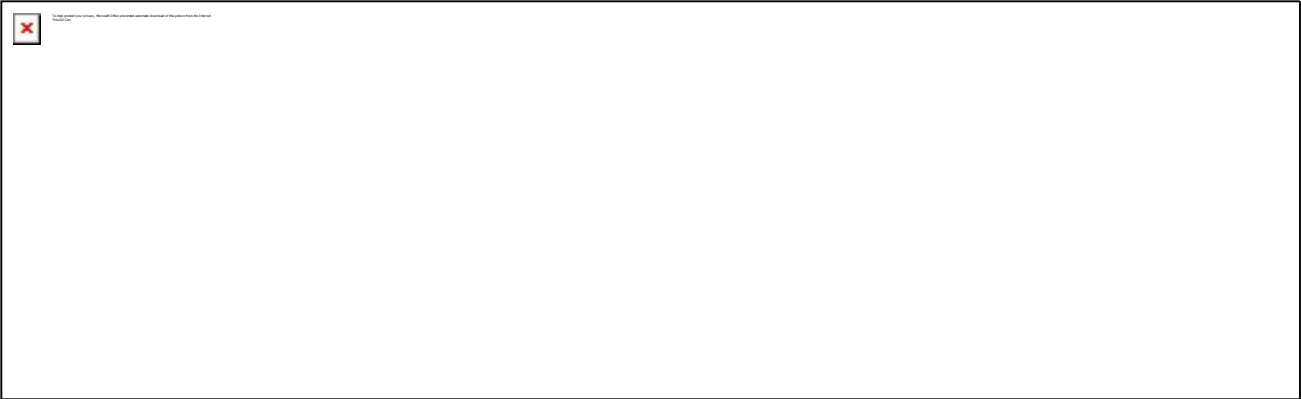
I would also strongly suggest that the Bank of England sports club site is included in the Site Allocations to be protected for sport, as per my previous comments.

I am more than happy to meet to discuss these points if you would feel it helpful.

Kind regards,

Laura Hutson
Planning Manager





Level 1 21 Bloomsbury Street WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gaile Walters](#)

From: Laura Hutson
Sent: 11 February 2021 15:22
To: 'planningpolicy@wandsworth.gov.uk' <planningpolicy@wandsworth.gov.uk>
[REDACTED]
Subject: Wandsworth Local Plan

Dear Sir/Madam,

Wandsworth local plan

Thank you for consulting Sport England on the above named document. Please find herein our formal comments for your consideration.

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England 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. To achieve this our planning objectives are to seek to PROTECT sports facilities from loss as a result 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.

We work with the planning system to achieve these aims and objectives, seeking to ensure that they are reflected in local planning policies, and applied in development management. Please see our website for more advice: <http://www.sportengland.org/facilities-planning/planning-for-sport/>

Site allocations and playing field provision

Development that would either involve the loss of playing field or prejudice the use of the playing field (for example, housing immediately adjacent to an existing playing field) would be strongly resisted by Sport England.

I note that there is no inclusion of the Bank of England sports centre and playing field site (Roehampton) in the Local Plan site allocations. I would like to note that this is a strategically important site and it is Sport England's strong desire that this site is protected for sport, particularly as we are aware that discussions over a change of ownership are ongoing, albeit these have been somewhat delayed by the onset of the Covid-19 pandemic. This is particularly important in light of the fact that uncertainty over the future of the site has led to some users being unable to access the site and seeking access to facilities elsewhere.

I note there is no inclusion of the Springfield hospital site. I am aware that the planning permission for this site is currently being implemented. I would remind the Council that this site formerly included a formal sport facility, and the appeal was allowed on the basis that the site would include both 'active and passive sports', it is important to Sport England that a portion of the site is allocated for formal sport. I understand the applicant is currently carrying out a study via a consultancy to determine the most appropriate sports provision for this site. Sport England, NGBs and local clubs would all derive significant comfort from the allocation of a portion of the site for formal sport.

Playing Pitch Strategy

The Local Plan should be informed by a robust and up to date assessment such as the Playing Pitch Strategy which I am aware is in the process of being completed for Wandsworth and due to be completed by the end of 2021. Once completed and adopted, Sport England would consider this to be a robust part of the evidence base for sport; this is welcomed.

Protecting playing fields and sport facilities – LP56 Open Space, Sport and Recreation

Currently the NPPF states:

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*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

Sport England notes the inclusion of this text in the Local Plan as supporting text for this policy and is supportive of this inclusion.

However, Sport England feels that the text of policy LP56 itself potentially contradicts this NPPF paragraph. It states:

A. Any proposal that would result in a loss of sports pitches, playing fields, or land last used for outdoor sport, or which would prejudice the land's future use for sport in terms of quality or quantity of facilities, will not be permitted unless it can be clearly demonstrated that:

1. it would provide open space and/or secure public access to private facilities in areas identified as deficient in open space, play space or sport and recreation facilities; and

2. it would meet the priorities identified in the Council's Playing Pitch Strategy, Open Space Study, Active Wandsworth Strategy, Parks Management Strategy or the relevant All London Green Grid (ALGG) Area Framework.

Lost playing field generally cannot be replaced by playing field that already exists – there must be additionality in order for the NPPF exceptions to be met. Lost playing field can also only potentially be justified as surplus to requirements by the Wandsworth Playing Pitch strategy, and not any of the other studies mentioned in this policy. For the avoidance of doubt, Sport England would strongly suggest that this policy is reworded in order to make this clear and in line with the NPPF requirements.

This policy also states:

B. Any proposal involving the loss of indoor sports facilities and recreation facilities will not be permitted unless it can be clearly demonstrated that:

1. there is no current or future need or demand for the facility, either in its current use or for any alternative sports or recreation use; or

2. replacement provision of an equivalent or better quantity and quality which supports any identified current and future need will be provided in an appropriate location.

I am unclear as to the status of a current Built Facilities Strategy for Wandsworth Council, which would be required in order to assess point B1 of this policy. Without a robust and up to date assessment of indoor sports facilities, it is not possible to make a judgement as to current or future need or demand for the facility. I would be grateful if this could be clarified.

With regard to paragraph C of LP56, I would suggest that the provision of new sports facilities should also be justified by either the Playing Pitch Strategy or a Built Facilities Strategy, as appropriate, in order to ensure that facilities are located appropriately in areas of strategic need. This will also help ensure that such facilities are sustainable. Sport England is supportive of the desire to maximise the multiple use of facilities and encourage co-location of services between sports providers. Sport England also welcomes the support for the provision of sports lighting where appropriate.

Economic development

Sport England wishes to highlight the fact that sport makes a substantial contribution to the economy and to the welfare of individuals and society. It is an important part of the national economy, contributing significantly in terms of spending, economic activity (measured using Gross Value Added) and employment. For those who participate there are health and well-being (or happiness) impacts. Its economic impact places it within the top 15 sectors in England and its wider economic benefits mean that it is a key part of society, which results in huge benefits to individuals and communities. Sport England would therefore request that the value of sport to the economy is reflected within the Local Plan.

Health and wellbeing – Active Design

I note within the document that there are references to ensuring the health and wellbeing of residents, including a strong commitment towards Active Travel.

Sport England believes these references would be further strengthened by specifically referencing Sport England's Active Design Guidance, with the recommendation that future design proposals follow its principles.

Sport England and Public Health England have refreshed our 'Active Design' guide which provides some really useful advice and case studies with clear reference to the NPPF to maximise the opportunities for design in physical activity. Sport England would commend this to you and suggest the concept of 'Active Design' be incorporated into policy and any new developments – please see website extract and link below:

Active design

We believe that being active should be an intrinsic part of everyone's daily life – and the design of where we live and work plays a vital role in keeping us active.

Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

That's why Sport England, in partnership with Public Health England, has produced the Active Design Guidance. This guidance builds on the original Active Design (2007) objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the Ten Principles of Active Design.

Ten principles

The ten principles have been developed to inspire and inform the layout of cities, towns, villages, neighbourhoods, buildings, streets and open spaces, to promote sport and active lifestyles.

The guide features an innovative set of guidelines to get more people moving through suitable design and layout. It includes a series of case studies setting out practical real-life examples of the principles in action to encourage planners, urban designers, developers and health professionals to create the right environment to help people get more active, more often.

The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

Active Design has been produced in partnership with David Lock Associates, specialists in town planning and urban design.

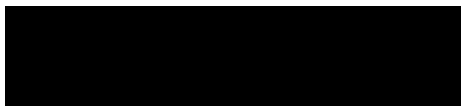
<http://sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design>

Thank you once again for consulting Sport England. Please do not hesitate to contact me should you have any queries.

Kind regards,

Laura

Laura Hutson
Planning Manager



Level 1 21 Bloomsbury Street WC1B 3HF



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Louise Hartley](#)

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If

you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact Gaile Walters, Sport England's Data Protection Officer directly by emailing DPO@sportengland.org