

Sport England

Dear Planning Policy Team

Thank you for consulting Sport England on the above named document,

I note that the Local Plan makes reference to prioritising walking, cycling and public transport; this is welcomed. Sport England also welcomes the commitment to creating 20 minute neighbourhoods.

Strategic Policy HE2.1 Health and Wellbeing.

Sport England is supportive of improving and promoting active and healthier lifestyles as set out in this policy. Sport England feels that this aim could be made stronger by including a reference to 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>

Site Allocations

Site Mo3 Imperial Sports Ground

I note that the policy acknowledges that it is important that any residential development here is designed to minimise the impact of the adjacent sports facilities, as set out in a previous email from Sport England (see below). It is essential that this is the case in order to avoid prejudicing the existing playing fields. I also note that the Merton Playing Pitch strategy states that a Section 106 financial contribution will need to be agreed as part of any future development on this site, to ensure investment into the sporting facilities on the wider site.

Site RP5 – All England Lawn Tennis club

I would refer you to our previous comments below, copied here for reference:
Sport England supports the opportunity to secure this site for sport. However, this policy should be reviewed in the context of the community's needs as set out in the Council's emerging Playing Pitch Strategy. The plans submitted for the site (and granted under planning application reference: 18/P1024) show an area of the site reserved for playing pitches to accommodate football (or other sports). The policy could therefore be amended to help secure community access for pitch sports users of the site. The policy should also make it clear whether or not any community use of the tennis courts will also be secured by the Council (the policy mentions programmes for primary aged children, but there is limited information about any other potential community users).

Site RP6 Land at the former LESSA Sports Ground

I note that Merton Playing Pitch Strategy states that *this site should be bought back into use (if viable) to meet current sporting needs and future demands. These sites should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough.*

At the time of responding there is a live planning application under consideration and NGBs are in the process of considering whether it is viable to meet current sporting needs, or whether a S106 contribution towards nearby playing fields identified in the PPS as requiring improvements in more appropriate in this particular instance.

Wi3 – All England Club Community sports ground

As previously stated, Sport England is supportive of this allocation.

Site Mi14 – United Westminster Schools site

I note that Merton Playing Pitch Strategy states *that this site should be bought back into use (if viable) to meet current sporting needs and future demands. These sites*

should be subject to thorough investigation by the steering group and the landowners, to understand whether a club or community group would be able to purchase and viably deliver part, or all of the site, for sporting use. This investigation is subject to a time limit of no more than 6 months from the date this PPS is adopted by the council. Should the site not be delivered for sporting use, a Section 106 financial contribution will need to be agreed as part of any development on the sites, to reinvest in other sport facilities in the borough.

Sport England has worked with the Local Authority and the relevant national governing bodies for sport in order to determine how it can be brought back into use for sport and feasibility studies/surveys to this effect are in the process of being reviewed by Sport England and the NGBs. It is Sport England's strong preference that this site is retained for sport. Unless Sport England and the national governing bodies agree that it is not possible to preserve the site for sport following a review of the feasibility study, Sport England objects to residential development on this site.

Site Mi2 – Birches Close

Sport England would reiterate its previous comments. It is not clear from the proposals what the relationship is (if any) between this site and the playing field opposite which accommodates a cricket field. If this site contains any ancillary facilities that support the playing field such as car parking, Sport England would object to their loss. If the future of the maintenance of the playing field is associated with this site, the Council should consider how this will be addressed, should this NHS site be converted to residential development.

Site Mi3 – Burn Bullock and Mitcham Cricket Pavilion

To reiterate previous comments, Sport England welcomes the opportunity to maintain the cricket pavilion on this site. It should be made clear which part of the site will be redeveloped. Also if the car parking on this site serves the cricket ground it may be important to retain some parking to serve the cricket ground. The allocation should make clear and draw from the findings of the playing pitch strategy to help identify which part of the site will be retained for sport.

Site Wi1 – Battle Close

Sport England retains its objection – This is a former private health & fitness club with car park. In line with paragraph 93 of the NPPF, Sport England considers that the allocation should be more explicit in seeking to ensure that there is a retention of a health and facility or sports use on this site.

Site Wi12 – Wimbledon Stadium

To reiterate, Sport England supports the use of this site for sport. Comments in the plan should where possible reflect what has been agreed through the planning history for this site. I note the reference to retaining and equivalent or enhanced squash and fitness club as part of sporting intensification and welcome this.

Site Wi15 – YMCA Wimbledon

Sport England would reiterate its previous objection/comment - It is noted that this site includes a sports hall and gym. It is not known how large this sports facility is and what community use (if any) these sports facilities have. In the context of

paragraph 93 of the NPPF the Council should consider whether or not it is important that these uses are retained within any redevelopment of this site.

Green and Blue Infrastructure policy

Policy O8.2 – Support - Sport England welcomes the Council's intention to protect existing open space (including playing fields) from development. It is considered that this policy is in accordance with the NPPF

Policy O8.5 – Support – Sport England considers that this policy is in line with NPPF and provides adequate protection and provision for sport.

Thank you, again, for consulting Sport England. Should you wish to discuss any of the above please do not hesitate to contact me.

Kind regards,