

# Sport England

Dear Planning Policy Team,

Thank you for consulting Sport England on the above document. I wasn't able to find a copy of any comments made on Stage 1 of the Local Plan (consultation early last year), so it is likely that we missed the previous consultation.

## **Evidence base**

As you will be aware Sport England has been working to support the Council to develop its evidence base for indoor and outdoor sports facilities. It is important that the Council completes these documents as soon as possible to support the emerging development plan. A meeting should take place in the New Year regarding the PPS and I would welcome the opportunity to review the Council's indoor sports facilities strategy document when this becomes available.

## **Strategic Objective 1: Healthy Places**

Sport England supports the Council's commitment to making Merton a healthier place for all and welcomes the Council's recognition that opportunities for sport and physical activity can help enhance health and wellbeing.

## **Strategic Objective 2: Place**

Sport England supports the Council's intention to protect and improve the borough's parks and open spaces. Paragraph 2 (e) refers to providing a balance between; 'areas for quiet enjoyment, wildlife and areas to be used for sports, games and recreation'. Open space can be multi-functional. Sport England would instead encourage the policy to recognise that open space can facilitate a range of uses and encourage the creation of a network of multifunctional open space. For example the same open space can accommodate sports use and active recreation, while also functioning as sustainable urban drainage or productive landscapes (food growing areas, allotments, community orchards etc.). Please see Principle 5 of Sport England's Active Design guidance; <https://www.sportengland.org/facilities-planning/active-design/>

## **Strategic Objective 5: Infrastructure & Strategic Policy HW2.1&2.2 – Health & wellbeing**

Sport England supports the Council's ambition to make Merton a well-connected and accessible place where walking, cycling and public transport are the modes of choice when planning all journeys and the further guidance in HW2.2 relating to delivering healthy places. Sport England further recommends that the Council may also wish to encourage developers to incorporate the 10 principles set out in Sport England's Active Design guidance.

An additional section should be added to the policy which sets out the design principles that new development will be expected to accord with enable/encourage

healthy and active lifestyles. Sport England & Public Health England's Active Design guidance <http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/> sets out Government endorsed guidance on how the design and layout of new developments can be planned to make communities more active and healthier and some of the principles in this guidance could be incorporated into a new section of the policy. The supporting text to the policy should refer to the Active Design guidance and the Healthy Streets Approach to signpost applicants to detailed advice.

### **Site id: Mi2 – Birches Close**

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 id: Mi3 – Burn Bullock and Mitcham Cricket Pavilion**

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 id: Mi4 – United Westminster Schools Site**

Objection - Sport England objects to the allocation of these playing fields for development. Government Planning Policy (paragraph 97 of the NPPF) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless: a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) 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; or c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

The Council's Playing Pitch Strategy should provide the Council with the information required to determine whether or not this playing field is genuinely surplus to requirements and help determine what the future of this site could be. If any housing development is proposed on part of this site the location of this should be shown clearly within the site allocation diagram and further information about the sporting facilities that could be appropriate should be made explicit within the policy. Sport England would welcome a further discussion of this site with the Council.

### **Mo3 – Imperial Sports Ground**

Comment - Sport England is concerned that residential development in this location could have an adverse impact on the operation of the sports pitches adjacent to this site. It is welcome that some of these issues have been highlighted in the policy. Any development on this site should not place residential development in a location where any new residents could adversely be impacted by noise or light from the development. Sport England is aware of other residential developments located near sports pitches where resulting complaints to Environmental Health have led to the adjacent artificial pitch having its lighting or opening hours reduced, as this is able to occur even if the pitches are existing when residents move in. There is also sometimes a risk from ball strike.

Please see the following Sport England design guidance for more information about acoustic implications associated with artificial grass pitches and possible measures to reduce noise and further notes regarding sports lighting;

<https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/artificial-grass-pitch-acoustics-planning-implications/>

<https://www.sportengland.org/facilities-planning/design-and-cost-guidance/artificial-sports-facilities/>

### **Site RTP5 – All England Lawn Tennis Club – Community Sports Ground**

Comment – 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, Grand Drive, Raynes Park, SW20 9EB**

Object – Until the Council has completed its Playing Pitch Strategy, the plan cannot evidence that the allocation of this playing field for residential development is justified. The PPS will also provide more information on current demand from the local community for playing pitches. The final paragraph 'opportunities' notes that the site may have opportunities for whole site sports use this accords with paragraph 93 of the NPPF.

It is noted that the applicant claims that the legal obligations requiring the playing field to be made available as open space have expired. Sport England is willing to review the relevant documents with the Council if this would assist.

### **Site Wi1 – Battle Close**

Object – 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 Wi3 – All England Lawn Tennis Club**

Comment – Sport England supports the acknowledgement in the plan of the site's status as a World class sporting venue of national and international significance.

### **Site Wi12 – Wimbledon Stadium**

Support - 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.

### **Site Wi15 – YMCA Wimbledon**

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.

### **Design**

Comment – Sport England welcomes the Council's commitment to requiring good design. As referenced in our comments on policy HW2.1&2.2 – health & well being. Sport England recommends that further text is added to LPD5.1 to include more of the 10 principles referenced in Active Design. Reference to Active Design could also be made in the supporting text.

### **Infrastructure**

#### **Policy In 6.2 – Delivering social and community infrastructure**

Comment/Object – Sport England recommends that the Council clarifies in this section that indoor and outdoor sport and recreation facilities will be covered under Policy O8.4 and O8.5.

The Council's intention to protect community facilities including sport and leisure facilities from development is supported but we are concerned that it may not provide sufficient protection for indoor sports facilities and the policy could result in sports facilities being converted or replaced with educational buildings or health provision etc if read in isolation. Paragraph 93 of the NPPF gives specific protection from development for other uses and it is welcome that the relevant text from paragraph 93 is included within Policy O8.2 and that there is a separate policy for indoor facilities in Policy O8.5. It may therefore be appropriate to include text within policy 6.2 to clarify that indoor and outdoor sports facilities will be covered under Policy O8.2 to address any confusion relating to the protection of sports facilities.

Sport England further supports the Council's intention to encourage education providers to allow community use of sports facilities.

## **Environment**

Policy O8.2 – Support - Sport England welcomes the Council's intention to protect existing open space (including playing fields) from development.

Policy O8.2(i) - Comment - As set out in our comments in relation to strategic objective 2i the plan should also recognise that Open space can be multi-functional. Sport England would instead encourage the policy to recognise that open space can facilitate a range of uses and encourage the creation of a network of multifunctional open space. For example the same open space can accommodate sports use and active recreation, while also functioning as sustainable urban drainage or productive landscapes (food growing areas, allotments, community orchards etc.). Please see Principle 5 of Sport England's Active Design guidance; <https://www.sportengland.org/facilities-planning/active-design/>

Policy O8.2 (e) – object – Sport England is concerned that this policy could be used as a reason to refuse buildings or structures required to support use of MOL for sporting purposes e.g. cricket nets, sports pavilions, grounds maintenance sheds, fencing for artificial pitches, floodlighting etc. Community sports groups may not have the resources to finance expensive buildings or may not be able to expand their training facilities. This could be addressed through additional text that confirms the Council will support improvements to community sports facilities provided that they do not impact on the openness of the green belt and comply with National and Regional planning policies.

Policy O8.5 – object/support - Sport England welcomes the commitment to safeguarding existing facilities within this policy and having a separate policy that makes the important link between healthy and active lifestyles and leisure, sport and recreation. However, we would raise concerns about the word 'viable' in paragraph (i). Sport England considers that the Council should seek to protect all sports facilities from development in accordance with paragraph 93 of the NPPF. The NPPF applies to all private and public sports facilities. Sometimes sports facilities can be expensive to run and maintain which can result in them being considered 'unviable' in the face of pressures to develop sites for other uses, this is not something that should form part of the policy. Instead, the Council's consideration of planning applications should be needs led and the preparation of a playing pitch strategy and indoor sports facilities strategy should help to provide further information about what is needed and whether or not any of the Borough's existing facilities (public or private) are genuinely surplus to requirements. A further clarification to the text and removal of the word 'viable' would help address this.

Sport England would welcome the opportunity to meet and discuss the above comments further,

Regards

Vicky

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