

From: [REDACTED]
To: [REDACTED]
Subject: Fw: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible
Date: Wednesday, September 23, 2020 10:22:49 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.jpg](#)
[image005.jpg](#)
[image006.jpg](#)

From: [REDACTED] >
Sent: 21 December 2018 09:54
To: [REDACTED] >
Cc: [REDACTED]
[REDACTED]
[REDACTED] >
Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Thanks [REDACTED], if you can keep us informed of progress with this in January it would be much appreciated.

Have a great Christmas!

[REDACTED]

From: [REDACTED] >
Sent: 21 December 2018 09:39
To: [REDACTED]
Cc: [REDACTED]
[REDACTED]
[REDACTED] >
Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

The GLA did indicate that they would share something at the beginning of the year so we anticipate we would have a steer by mid-January at the latest.

Kind Regards

[REDACTED] Planning Manager [REDACTED]

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emailing [Gail Laughlan](#)

From: [REDACTED]
Sent: 20 December 2018 12:48
To: [REDACTED] >
Cc: [REDACTED]
[REDACTED]
[REDACTED] >
Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

Thanks for your email. I can appreciate the logic in your suggestion, but as you say ultimately whether or not the approach you have set out is acceptable to Sport England and DfE will depend on the revised wording for policy S5 that GLA come up with.

Have GLA committed to re-draft this and share a copy with you by a particular date? We would be keen to see this as soon as possible, bearing in mind that the GLA's deadline for written reps on social infrastructure is Friday 1st March and we anticipate internal deadlines from MHCLG in February to allow them to compile and agree the consolidated response.

Best regards,
[REDACTED]

[REDACTED]
Forward Planning Manager – South East
Planning Team, Capital Group
Operations Directorate
Sanctuary Buildings, Level 5, Great Smith Street, London, SW1P 3BT

Email: [REDACTED]
Mobile: [REDACTED]
Web: www.gov.uk/df



From: [REDACTED] >
Sent: 17 December 2018 17:19
To: [REDACTED] >
Cc: [REDACTED]
[REDACTED]
[REDACTED] >
Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

Thanks for circulating the proposed changes to the London Plan.

We have met with the GLA recently to discuss amendments to the London Plan, particularly in relation to Policy S5. Unfortunately we have not yet seen any revised wording from the GLA so we are unsure what extent that Policy, or indeed any other policies, have been amended but the GLA have indicated that the changes would be in line with the NPPF, paragraph 97. We have proposed amending the text of Policy S5 (B) by separating it into 2 parts with S5 (B4) separated from Policy S5 (B1-3) to form a new part (D) of Policy S5. We then proposed that this new part should have introductory text reading '*Development affecting sports and recreation facilities should...*' with the GLA adding text in line with paragraph 97. This would allow for enhancement of facilities.

In relation to Policy S3, we would support the reasons behind the intended changes, namely to align with the NPPF, paragraph 97 bullet point 3, and Sport England's Playing Field Policy Exception 5 however the suggested wording proposed does raise some concerns. The suggested wording would allow a situation where a playing field, or part of playing field, or another sports facility on a school site is lost due to enhancement of non-sporting facilities, such as a classroom. Sport England would be unable to endorse this situation.

Similar to the concerns we have had with Policy S5 (B4), it is questionable whether B10 is appropriate under Policy S3 given the content of the NPPF. As a suggestion, could deleting S3 (B10) be considered and then DfE supporting our suggested amendment to S5 (B)? This would address your concerns raised, i.e. bringing policy in the plan in line with paragraph 97, and could avoid any confusion caused by having an amended S3 (B10) and S5 (B4) alongside each other. Furthermore, proposing a link between Policies S3 and S5 could be suggested, for example including a line in S3 or its supporting text such as "*development proposals for education and childcare facilities affecting existing playing field and sports facilities should be considered against Policy S5*". This, however, would depend on the wording the GLA chose for Policy S5 which we could discuss once the GLA make it known to us.

Please let us know your thoughts.

Kind Regards

[REDACTED] Planning Manager [REDACTED]

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From: [REDACTED]

Sent: 17 December 2018 08:41

To: [REDACTED]

Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

Thanks for letting me know, if you can respond this week it would be much appreciated.

Best regards,

[REDACTED]

[REDACTED]
Forward Planning Manager – South East
Planning Team, Capital Group
Operations Directorate
Sanctuary Buildings, Level 5, Great Smith Street, London, SW1P 3BT

Email: [REDACTED]

Mobile: [REDACTED]

Web: www.gov.uk/dfc



From: [REDACTED] >

Sent: 14 December 2018 17:48

To: [REDACTED]

[REDACTED]

Cc: [REDACTED]

[REDACTED] >

Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

It was nice to meet you and thank you for circulating the proposed changes to the London Plan.

Unfortunately we have not had the opportunity to thoroughly consider the proposed changes but will get back to you as soon as possible at the beginning of next week.

Kind Regards

[REDACTED] Planning Manager [REDACTED]

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From: [REDACTED]

Sent: 10 December 2018 10:25

To: [REDACTED]

Cc: [REDACTED]

[REDACTED]

Subject: RE: DfE meeting Action Points - London Plan amendments - seeking feedback by Friday 14th if possible

Hi [REDACTED]

I hope you had productive meeting with GLA last week. Further to that, please could you provide some feedback – [by this Friday if possible](#) - on our proposed amendment to Policy S3 of the London Plan (see original email below) and any relevant issues that came out of your meeting? This will enable us to incorporate your views into our draft matters statement.

Best regards,

[REDACTED]

[REDACTED]

Forward Planning Manager – South East
Planning Team, Capital Group
Operations Directorate
Sanctuary Buildings, Level 5, Great Smith Street, London, SW1P 3BT

Email: [REDACTED]

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Web: www.gov.uk/dfes



From: [REDACTED]

Sent: 29 November 2018 17:33

To: [REDACTED]

[REDACTED]

Subject: RE: Meeting Action Points - London Plan amendments

[REDACTED]

Thanks for the meeting today, it was a useful discussion and your summary of the agreed actions

looks good to me.

Re the point about exchanging positions on the draft London Plan, please see below details of the change to policy S3 that we are seeking which relates directly to playing fields. The additional text that we would like to see inserted is highlighted in red font, followed by a brief summary of the justification and a note on the feedback we received from GLA on this amendment at our meeting with them on 11th October.

We would really appreciate your feedback on this, including any suggested amendments from your side. We'd be happy to work through a few iterations of this to get to a form of words that we can all sign up to.

Policy S3 education and childcare facilities, part B10

B: Development proposals for education and childcare facilities should: ...

*10) ensure that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand, **or the development would result in an enhancement of facilities, the benefits of which would clearly outweigh the detriment caused by the loss.***

Justification:

- London represents a special case in terms of lack of suitable available sites for new schools to meet need, including the significant projected need for additional secondary school places over the next five years. The DfE has extensive experience of searching for school sites in London and we have found that suitable, available sites are in very short supply. We therefore wish to avoid ambiguities in policy that could have the unintended effect of further constraining the supply of suitable sites for schools, undermining the ability of local education authorities to meet their statutory duty to provide sufficient school places to meet need within their areas. This amendment will ensure that the plan is positively prepared and effective in terms of meeting objectively assessed needs for school places.
- As currently worded the policy is very inflexible. It can be interpreted as indicating that there should be no net loss of a wide range of facilities, including playing fields, under any circumstances except where "it can be demonstrated that there is no ongoing or future demand". Thus the policy would exclude the reasonable caveats included in NPPF paragraph 97 (pasted below for reference) regarding building on playing fields, and would also exclude Sport England's exceptions to its playing fields policy*, particularly Exception 5 which is particularly relevant to the development of new schools; it states: "*The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field.*"
- It is important that Policy S3 B10 allows flexibility where there is a clear overall benefit in terms of enhanced facilities provision (taking into account local needs), despite a limited loss in the quantity of existing facilities, such as a new school providing indoor and outdoor facilities for sport of significantly improved quality, accessibility and availability for shared use by the local community (secured through a CUA if appropriate). This flexibility will enable greater benefits to health and wellbeing and facilitate the provision of new schools where required to meet growing need. It should also be recognised that schools provide considerable longevity of use for playing fields and facilities, including reliable stewardship and investment over time. They can also provide sports specialisms which vary from one school to another, impacting greatly on the futures of the children who attend.

GLA feedback: They have taken Sport England input into account in formulating policy and have to be consistent with 2012 NPPF. We should consider engaging with Sport England further on this issue and try to agree a Statement of Common Ground ahead of any debate on this at the EIP.

NPPF Paragraph 97

97. 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.*

*Playing fields policy and guidance (Sport England, March 2018)

One further thought - if you amend policy S5 part B to apply to a wider range of development proposals including new schools (which I think you mentioned was one of the changes you would be seeking from GLA next week?), then the above amendment may equally apply to policy S5 part B4.

Happy to discuss further and/or clarify any of the above points.

Best regards,

[Redacted]

[Redacted]

Forward Planning Manager – South East
Planning Team, Capital Group
Operations Directorate
Sanctuary Buildings, Level 5, Great Smith Street, London, SW1P 3BT

Email: [Redacted]

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From: [Redacted] >

Sent: 29 November 2018 16:26

To: [Redacted]

[Redacted]

Cc: [Redacted]

[Redacted]

Subject: Meeting Action Points

[Redacted]

Thank you very much for the meeting today which I thought was very productive in terms of exploring how we can work more closely together around school redevelopments and playing fields. I took from the meeting the following Actions:

- Sport England (SE) to provide a list of Playing Pitch Strategies (PPS). DfE to consider piloting engagement with a PPS where it aligns to a project within their pipeline.
- SE to produce a draft list of what information is required to allow them to make comment (pre contractor appointment). DfE to review and suggests amendments prior to testing.
- SE and DfE to exchange up to date lists of their planning staff with geographic areas.
- DfE to think about any other information that Sport England could capture around school planning applications through its engagement in the planning process;
- DfE to explore the use of Active Places Power www.activeplacespower.com and let SE know whether they would benefit from some training
- SE and DfE to exchange their positions on London Plan. SE to check what their position on policy S3 and update DfE after their meeting with the Mayors Team on 3rd December
- SE (NE) to write to MCHLG and ask them to remove the NPPFG wording and include in the above actions to show how both DfE and SE teams are working together

Hopefully this covers everything but please let me know if I have missed anything.

[Redacted]

Head of Planning

T: [Redacted]

[Redacted]



Image removed by sender. This girl can

1st Floor, 21 Bloomsbury Street, London, WC1B 3HF



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