

Draft London Plan EIP
Organisation: Sport England
Reference ID: 1620
Matter Number: 64

Questions posed by the Planning Inspectors:

Green infrastructure, open space and urban greening

M64. Would the policies for green infrastructure assist in creating a healthy city in accordance with Policy GG3 and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are Policies G1, G4 and G5 and their detailed criteria justified and necessary and would they provide an effective basis for development management? How would they affect the implementation of Policies GG4 and GG5 on delivering the homes Londoners need and growing a good economy? In particular:

Is the Mayor's target of making more than 50 percent of London green by 2050 and its designation as a National Park City justified and achievable?

b) Do the policies adequately reflect the qualitative differences and value of different types of green infrastructure, including open and green space and the role of waterways (blue space) and the access to it?

c) Given the All London Green Grid is it necessary for Boroughs to prepare green infrastructure strategies in accordance with Policy G1 B?

d) Does Policy G4 provide sufficient protection for the amount and quality of all green and open space including private gardens and allotments and on housing estates? Is the categorisation in Table 8.1 justified? Should the policy refer to the improvement of existing spaces?

Sport England writes in response to Matter 64 and, in particular, part (d).

We welcome the Greater London Authority (GLA)'s intention to seek to safeguard London's open spaces.

Currently Policy G4 provides the main protection for the playing fields and outdoor sports facilities located within London's open spaces. However, Sport England is concerned that as currently read Policy G4 is not consistent with national policy, notably Paragraph 74 of the National Planning Policy Framework (NPPF) (2012) (now paragraph 97 of the 2018 NPPF).

Bullet point 4 of paragraph 182 of the 2012 NPPF (now Bullet point (d) of paragraph 35 of the 2018 NPPF) requires development plans to be consistent with national policy.

Sport England has insufficient information to determine what size the areas of deficiency identified through an open space assessment using Table 8.1 are likely to be. Sport England is concerned that the method used for determining the areas of deficiency does not take into account all of the factors that Sport England usually recommends are considered when looking at whether an outdoor sports facility (including playing fields) is clearly 'surplus to requirements' in the context of bullet point (a) paragraph 74 of the NPPF (2012).

For example, for playing fields Table 8.1 would not require consideration of the quality of provision including the capacity of the pitches (i.e. how many matches a pitch can sustain) or assess any ancillary provision (such as changing facilities, floodlighting and other supporting structures).

Paragraph AB indicates that where development is proposed on open space (including playing field) outside areas of deficiency (see Policy G4 AB 1A) the policy requires '*equivalent or better quality provision should be made within the local catchment unless an up-to-date needs assessment demonstrates this is unnecessary*'.

The relevant criterion of paragraph 74 of the 2012 NPPF states that the loss of open space (including playing fields) should be '*replaced by equivalent or better provision in terms of quantity and quality in a suitable location*'. Providing replacement open space (or playing field) of equivalent quantity is therefore also important and should be included in policy G4.

Paragraph 74 of the NPPF also allows for existing open space to be replaced with '*alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use*'. And this is also absent from Policy G4.

Sport England has met the GLA planners a few times since submitting our initial comments in early 2018. We understand that changes to the Plan are currently being considered to address Sport England's comments. We have discussed the following comments provided by Sport England to the GLA regarding Policy S5 following the minor suggested changes to the plan that were published in July 2018;

Policy S5

- Sport England welcomes the recent additional text for Policy S5B (4). However, the beginning of Policy S5 B states; '*development for sports and recreation facilities should....*' Is it intended that this policy should apply only to sport and recreation facilities?
- If, for example, a new school or a housing development is proposed on an existing artificial pitch or sports hall would policy S5 apply?
- Would you be prepared to amend the text of Policy S5 B to be separated into 2 parts with S5 B (4) separated from Policy S5 B (1-3) to form a new part (D) of Policy S5 to read; '*Development affecting sports and recreation facilities should...*' '*ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's assessment of the need for sports and recreation facilities should be used to identify ongoing or future demand.*' S5(B) 1-3 would remain as they are in the draft Plan.

Sport England considers that if these further changes are made and form part of an amended and separated S5 B(4) that could also cover outdoor sports facilities in wider open spaces e.g. playing pitches, then this should go some way to help address our concerns.

Protection for built sports facilities. e.g. artificial pitches, tennis courts and ancillary buildings

The London Plan defines open space as; *'All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.'*

Does the GLA consider that artificial pitches, tennis courts, skate parks, Multi-Use Games Areas (MUGAs) and sports pavilions are included in this definition of open space?

Sport England recommend further clarification is provided so that these facilities are protected by Policy G4 (or a revision to Policy S5).

Paragraph 8.4.4

As set out in our representations, Sport England is concerned that paragraph 8.4.4 makes no reference to sport facilities. Outdoor sports facilities should also be amongst the range of benefits that are encouraged in London's green spaces.