



Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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28 February 2018

Dear Mr Khan,

DRAFT LONDON PLAN – DECEMBER 2017

Thank you for inviting Sport England to comment on the above document. 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/>

Having viewed the document, Sport England has the following comments to make in the attached table.



Sport England would like to meet with you at the earliest opportunity to discuss these comments further. I will contact the Greater London Authority planning team to arrange this meeting shortly.

Yours sincerely

[Redacted signature]

[Redacted name]

Planning Manager

Tel:

Email:

[Redacted contact details]

Policy/Paragraph/ Table	Response OBJECT/ SUPPORT/ COMMENT	Comments
Chapter 1 – Planning London's Future - Policy GG3	Comment	<p>Sport England would like to see the Plan identify opportunities for sport and physical activity and acknowledge the important role these facilities play in improving the lives of Londoners.</p> <p>Additional text;</p> <p>H) <u>'Seek to identify opportunities to increase provision for sport and physical activity through new development and improvements to existing sports and recreation facilities'.</u></p>
Active Design - Policy GG3 Creating a Healthy City, Policy D1, D2 and D7	Support/Comment	<p>Sport England welcomes that the Mayor intends to create a healthy city and considers this to represent 'Good Growth' by including a specific policy to create a healthy city (Policy GG3) in Chapter 1. Sport England agrees with paragraph 1.3.1 that a community's health is determined by the environment in which they live and that the planning system has an important role in shaping such environments to improve Londoners health and wellbeing. The Plan, at paragraph 1.3.1, cites inactivity as an issue and combating inactivity is a key objective for Sport England as set out in its strategy, Towards an Active Nation, as well as supporting behavioural change to build activity into people's lives therefore Sport England support the plans intention to reduce inactivity.</p> <p>Although promoting active travel and changing behaviours is key in decreasing inactivity and improving health and wellbeing, Sport England believe that the design of where communities live and work is just as vital in keeping people active and placemaking should create environments that make the active choice the easy choice. Sport England along with Public Health England have launched our revised guidance, Active Design, which intends to inform the urban design of places, neighbourhoods, buildings, streets and active open spaces to promote sport and active lifestyles. The guide sets out ten principles to consider when designing places that would contribute to creating well designed healthy communities which has considerable synergy to many of the objectives of the policies within the London Plan, especially in requiring networks of open space and green networks, encouraging active travel and promoting 'Healthy Streets' in</p>

		<p>the Design and Public Realm Policies (Policies D1, D2 and D7). Furthermore, Paragraphs 3.7.4 to 3.7.11 highlights 'Healthy Streets' and other aspects of Active Design such as accessibility, high quality and attractive development, wayfinding, management and maintenance, lighting and public drinking fountains/supporting infrastructure.</p> <p>The incorporation of these elements is welcomed but Sport England consider that the London Plan should be a leader in promoting health and wellbeing within design and designing out inactivity thereby the Plan should advocate the inclusion of all the Active Design Principles and have specific links to the Active Design guidance within the document. The London Plan, for instance, in Policy GG3 should require developments to incorporate Active Design and for applicants to submit the Active Design checklist with proposals that indicates that Active Design has been adequately considered and incorporated. Alternately Sport England would support a specific Active Design policy please see page 53 of Sport England's Active Design Guidance; http://www.sportengland.org/facilities-planning/active-design/</p> <p>The Active Design Guidance has suggested text that could be adapted and used to support the policy.</p> <p>Sport England would happily work alongside the GLA in incorporating Active Design with the London Plan. Further information, including the Active Design Guidance, can be found at https://www.sportengland.org/facilities-planning/active-design/</p>
Chapter 3 - Design		
Policy D12 Agent of Change/Policy D13 Noise	Object	<p>Sport England suggests that our guidance: Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015, is referenced here and is used as a starting point when assessing planning applications which involve Artificial Grass Pitches (AGPs), Multi Use Games Areas (MUGAs) or courts in areas of proximity of residential developments and where new residential developments are proposed adjacent to AGPs and MUGAs.</p> <p>Artificial grass pitches (AGPs) and Multi Use Games Areas (MUGAs) are a key part of the modern sporting landscape and provide valuable facilities for local communities.</p>

		<p>This guidance expands on the general technical advice already available from Sport England. It provides details of acoustic implications associated with such facilities and follows on from an acoustic research programme involving detailed analysis of relevant noise guidance documents and site testing in a range of locations. It proposes appropriate noise criteria and assessment methods and outlines practical measures that can be applied to reduce noise in particularly sensitive areas.</p> <p>There is no previous guidance or assessment methodology specifically relating to noise from AGPs and this guidance considers the issues from first principles. It offers a simple explanation for those wishing to develop such facilities and provides a more consistent approach for Local Authority noise assessments and limits that might be set for proposals adjacent to sensitive residential areas. It highlights the importance of considering the potential for disturbance to neighbours early in the planning and design stages.</p>
Paragraph 3.13.6	Object	Sport England is concerned over the use of the phrases; tranquil areas, quiet areas and spaces of relative tranquillity. This is subjective and not precise, and therefore open to interpretation/mis-interpretation.
Chapter 4 - Housing		
Paragraph 4.4.1	Object	The encouragement of 'meanwhile uses' should not be used to allow development on vacant playing fields or in vacant sport buildings, as this could potentially result in these sites being lost thereby conflicting with paragraph 74 of the National Planning Policy Framework.
Chapter 5 – Social Infrastructure		
Policy S1	Support	Sport England welcomes the acknowledgment of the important role sport plays in helping develop strong and social communities. For this reason, sport facilities should be protected from development.

Policy S1 (A)	Comment	Sport England does not object to built sports facilities being considered as social infrastructure, however, the policies require further amendment to ensure that sports facilities are sufficiently protected from development by education and health providers. These suggested amendments are set out in our comments in relation to paragraphs 5.1.5 and Policy S1(G).
Policy S1 (D)	Object	Sport England supports the co-location of different forms of social infrastructure. However, this is not supported where this would result in the loss of sports facilities. This is addressed in the suggested changes to Policy S1(G) and S5 below.
Policy S1 (G)	Object	<p>Like other community cultural uses (such as pubs (Policy HC7) and cultural facilities (Policy HC5)), both public and private sports facilities can fall into disuse through poor maintenance and a lack of investment and these facilities will require support from the London Plan to protect them from other types of development, this includes education and health care uses.</p> <p>Paragraph 74 of the National Planning Policy Framework seeks to protect built sports facilities for sport from development. Sport England therefore requires an amendment to this policy <u>and Policy S5</u> (see below);</p> <p><u>'H) Boroughs should recognise the important contribution to Londoner's health that is made by sport and recreation facilities. In consultation with Sport England and other relevant organisations Boroughs should develop an evidence base that seeks to protect and improve sports and recreational development within their local areas. Development proposals that result in the loss of sport and recreation facilities to other types of social infrastructure will also be considered against Policy S5'.</u></p>
5.1.4	Support	Sport England welcomes the support for the designation of Assets of Community Value.
5.1.5	Object	The Plan should make clear that this does not apply to sports facilities. Otherwise this policy has the potential to result in a loss of sports facilities to new schools and health care facilities which is not currently permitted under the National Planning Policy Framework (see also comments on Policy S1(G).
5.1.6	Comment	Some existing playing fields are located on existing hospital estates. It is important that these facilities, where they are needed by the local community, are protected from loss (see Sport England's comments in relation to Policy G4, S1 and S5).

5.1.8	Support/comment	Sport England supports the co-location of public sports facilities with other uses to help increase their use (where this does not result in a loss of sports facilities). See Sport England's Active Design guidance; www.sportengland.org.uk/activedesign .
Policy S3	Support/comment	<p>Please also see Sport England's guidance to promoting use of school sites for community use. This could be referenced in the supporting text. http://www.sportengland.org/facilities-planning/use-our-school/ The following text could also be added to the plan;</p> <p><u>'Boroughs should work with Schools to secure community use agreements for their facilities. Sport England provides further guidance to schools on how to manage community use and template community use agreements; http://www.sportengland.org/facilities-planning/use-our-school/</u></p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/community-use-agreements/</p>
5.3.12	Object	<p>Sport England understands the need to locate new schools next to existing playing fields in London where there is a shortage of space. However, this can inadvertently result in the displacement or eventual loss of community teams as grass pitches which are used regularly by a number of schools and community sport can exceed the carrying capacity of a pitch, rendering it unplayable.</p> <p>This could be addressed though encouraging School providers to contribute towards improvements to the drainage or through other solutions such as artificial pitches (see comments on 5.5.7 below);</p> <p><u>'Where new schools will use existing sports pitches or facilities, applicants should be encouraged to provide a contribution towards improving the affected facility to ensure it can support the additional use or consider innovative solutions to reduce the impact on existing open space. This could include artificial pitches or Multi-Use Games Areas on roofs or sunken sports halls where space is at a premium.'</u></p>

		For example, Chelsea Academy (LB Kensington & Chelsea) has a multi-use games area on its roof; http://www.chelsea-academy.org/key-information/facilities/
Policy S5 (A)	Support/Object	<p>Sport England supports the inclusion of a policy that seeks to ensure a sufficient supply of good quality sports and recreational facilities. However, in addition to assessing the need, Boroughs should also be encouraged to produce strategies to plan how they will plan to meet this need. The Core Planning Principles stated in NPPF, paragraph 17, requires plan making to “take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs”. Also, paragraph 73 not only requires an assessment of need but that this assessment should be used to determine what open space, sports and recreational provision is required, i.e. a strategy. The following text, therefore, should be added;</p> <p><u>‘4) Prepare a strategy setting out how the local authority will work with partners to deliver improvements to existing sports facilities and provide new facilities to support the increase population’.</u></p> <p>Sport England is further concerned that this policy together with Policy S1 and G4 are not sufficient to protect all sports facilities that are at risk from development, without additional changes. There are many ageing sports facilities across London that have suffered from a lack of investment but continue to meet the needs of residents. There are more that could be brought back into use through further public sector investment. To provide sufficient protection for these facilities (and in accordance with paragraph 74 of the National Planning Policy Framework) Sport England requires the following revisions (or similar) to the text;</p> <p><u>‘C Proposals that result in a loss of sport and recreation facilities should be refused unless;</u></p> <ul style="list-style-type: none"> • <u>A Local Authority playing pitch strategy or built sports facility strategy clearly shows that the sports facility is surplus to requirements.</u>

		<ul style="list-style-type: none"> • <u>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</u> • <u>The development is for alternative sports and recreational provision, the needs for which clearly outweighs the loss'</u>
Policy S5 B (2)	Object	<p>It will not be practical for all new development proposals for sport and recreation facilities to 'maximise the multiple use of facilities and encourage the co-location of services',</p> <p>The text should be amended as follows;</p> <p>'Where it is practical to do so maximise the multiple use of facilities and encourage the co-location of services between sports providers, schools, colleges and other community facilities.'</p>
Policy S5 B (3)/ paragraph 5.5.7	Object	<p>As set out in our comments in relation to Policy D12, Artificial grass pitches (AGPs), Multi Use Games Areas (MUGAs) and courts are a key part of the modern sporting landscape and provide valuable facilities for local communities. Sports lighting increases the hours of use a facility is available to the community and in some cases the commercial hire of facilities during the evening and/or weekend will help to secure the future viability of the facility, as without regular maintenance and replacement of the carpet or surface at the end of its lifecycle, facilities may have an uncertain future. Sport England would welcome amendments to the text to seek to encourage sports lighting whilst giving consideration to neighbours and biodiversity. For example;</p> <p>'...but efforts should be made to minimise the impact on surrounding areas, and to not cause a demonstrable harm to the local community or biodiversity, the hours of use of lighting should be agreed early in the process.'</p> <p>Replacement text;</p>

		<p><u>'In locations where there is the potential for harm to Sites of Importance for Nature Conservation (SINC) or the proposed sports facility is next to existing residential development the Local Planning Authority should require a floodlighting assessment and/or acoustic assessment where there are reasonable grounds to request this.</u></p> <p><u>Sport England provides further guidance on planning for sports lighting.'</u> The following documents could be referenced in the footnote;</p> <p><u>Artificial Grass Pitch (AGP) Acoustics - Planning Implications 2015</u></p> <p><u>Artificial Sports Lighting Design Guide 2012</u></p> <p>As an example, research by the Lawn Tennis Association has told us that London equates for 20% of the national participation in tennis. Within London, 44% of the people who picked up a racquet in 2017 played in a park (the national average is 33%) and this shows the importance of retaining and providing new floodlit courts within parks to increase opportunities for sport and physical activity and deliver the associated health benefits. The Lawn Tennis Association's (LTA) research has found that in some London Boroughs there is no access to floodlit tennis courts on a pay and play basis and has found this has had a detrimental impact on participation.</p> <p>As part of the LTA's investment programme 'Transforming British Tennis Together' the LTA are working with local authorities and other partners to increase the number of floodlit courts and indoor courts in London to increase participation in tennis.</p>
Policy S5 (C)	Comment	Please also see Sport England's comments in relation to Policy G3 and 5.5.3
Policy S5	Object – additional text required	It is noted that the GLA is seeking to increase housing density through other London Plan policies. Where high density development is proposed adjacent to an outdoor sports facility and there is a risk of ball strike, the applicant should be required to demonstrate that measures will be put in place to ensure that there will be no adverse impact on residents or result in the sports facility being forced to close in the future because of safety concerns. For example, a proposed high density residential block next to an existing cricket pitch.

		<p>Sport England suggests that the following additional text is included within the plan to help protect existing sports facilities;</p> <p><u>'Where new development (especially housing) is proposed adjacent to existing sports grounds Boroughs should require applicants to provide details of any mitigation that may be required if occupants of the new development will be at risk from ball strike.'</u></p>
5.5.3	Object	<p>Sport England strongly objects to the following text and requests that it is deleted;</p> <p>'Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy.'</p> <p>Sport England objects to this policy as it does not comply with bullet point 3 of paragraph 74 of the NPPF which permits playing fields to be replaced with built sports facilities.</p> <p>The text of the plan in paragraphs 5.5.2 and 5.5.3 identifies artificial pitches as built sports facilities. Artificial grass pitches are playing field and will often be built on existing playing field land. The London Plan highlights (in paragraph 5.5.2) an existing deficit of artificial grass pitches. This paragraph was informed by the Facilities Planning Model work commissioned by the Greater London Authority and provided by Sport England (see also footnote on page 69).</p> <p>Artificial grass pitches (AGPs), Multi Use Games Areas (MUGAs) and courts are a key part of the modern sporting landscape and provide valuable facilities for local communities. The policy could adversely impact on local authorities, schools, sport national governing bodies and community sports groups wishing to provide new artificial sports pitches or courts.</p> <p>For example, hockey is now only played on artificial surfaces and this proposal could limit the opportunity for new hockey pitches to be developed in London on existing playing fields.</p>

		<p>This proposed text could also have implications for the Parklife programme which it understood that the Greater London Authority has invested in together with Sport England, the FA and partner local authorities. https://www.sportengland.org/funding/parklife/ The aim of the programme is to create a sustainable model for football facilities based around artificial grass pitches on hub sites. These facilities will require floodlighting to make them viable and will usually be located on existing playing fields.</p> <p>As highlighted in Policy S3 and paragraph 5.3.12, artificial surfaces will be required to help support more intensive use of school and community playing fields.</p> <p>This text could also potentially lead to extensions to community sports facilities on grass pitches being refused. For example, with the expected increase in population, expansion of changing facilities could be discouraged by this text.</p> <p>Similarly, the conversion of a grass tennis court to a hard court could potentially be refused as a result of this policy, which would be allowed under paragraph 74 of the National Planning Policy Framework.</p>
5.5.4	Support	<p>Sport England welcomes the London Plan's support for up-to-date playing pitch strategies in the Boroughs. In addition to this work, Sport England would also like to work with the GLA to explore further the cross-boundary relationship between the inner and outer London Boroughs and how need is met across borough boundaries. Work is currently being undertaken for football and we would hope to share this with the GLA within the next few months. This will be particularly important for helping identify the best strategic location for artificial pitches.</p>
5.5.7 additional '5.5.7a'	Suggested paragraph	<p>Comment</p> <p>Evolving innovative new technology and advances in playing pitch design will continue to help provide solutions to planning issues in large cities such as London over the plan period. For example, floodlit artificial pitches, unlike grass pitches, can sustain more use and deliver enhanced outcomes. Through the Parklife programme, Sport England is working with several London Boroughs, The Football Association and the Premier League to identify potential hub sites that can help to meet some of the need identified for artificial grass pitches.</p>

		<p>Sport England would encourage the GLA and other stakeholders to continually consider the impact that advances in pitch design can have on the amount of use that a space can have for sport and physical activity.</p> <p>Improvements floodlighting technology continue to reduce light spill and proposals for Mutli-Use Games Areas on building roofs are also being developed.</p> <p>The following text is suggested;</p> <p><u>'The Mayor will work with the Boroughs to help encourage proposals for new sports facilities that seek to use new technologies and innovation to reduce any adverse impact on the local community and the environment.'</u></p>
Chapter 6 – Economy		
Policy E8	Object	<p>Sport England would like to see the role of sport and leisure and its importance in the capital highlighted within this section.</p> <p>Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are:</p> <ul style="list-style-type: none"> • In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the total GVA in England. This placed sport within the top 15 industry sectors in England and higher than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting.* • Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. <p>Sport also generates a range of wider benefits, both for individuals and society:</p>

		<ul style="list-style-type: none"> • The benefits of playing sport include the well-being/ happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering. • Consumption of sport benefits include the well-being/ happiness of spectators, and the national pride/feel good factor through sporting success/achievement. • The economic value of sport in terms of health and volunteering in England is estimated in 2011-2012 to have been £2.7 billion per annum for volunteering and £11.2 billion per annum for health. <p>(*Economic value of sport in England June 2013 published by Sport England)</p> <p>Traditional forms of employment have been changing in the last 100 years, unfortunately the perception of what employment land is, has not. The introduction of B8 distribution challenged local authorities in the 80's and '90s as more of these uses came forward. Sport is often overlooked as an employer.</p> <p>It is estimated that a total of 75,030 people are employed via sport in London, of which 51,984 are employed directly as a result of people participating in sport; e.g. coaches, sports services with a further estimated 23,046, employed in non-participation; e.g. broadcasting, gambling sportswear. This equates to an estimated income of £6605.2m brought in to the capital's economy every year.</p> <p>There are wider values as well in saving £3634.3m in the health economy and generating £410.8m in wider spending with a further £836.6 in volunteering.</p> <p>https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/</p>
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	<p>Looking at statistics for employment in London there are more people employed either directly or indirectly in sport than in the following industries: Agriculture, Forestry or Fishing (2,000); Mining and Quarrying (4,000), Electricity, Gas, Steam and Aircon (13,000); Water, Sewage and Waste Management (18,000). Interestingly there are only 140,000 (which is 2.4% of total employment in the capital), people employed in the manufacturing industry, just about double that employed in Sport sector, but great weight is given to protection of industrial land.</p> <p>https://www.nomisweb.co.uk/reports/lmp/la/1946157285/report.aspx</p> <p>Another which should be considered is Sport's education and mentoring programs for young people which are continually highlighted for their success in engaging with low achievers at school and equipping them with jobs and qualifications, which other employment sectors have not been able to achieve:</p> <p>https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/</p> <p>It is Sport England's contention that the London Plan should consider D2 sports uses; fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications in cases for those who wish to pursue vocational qualifications.</p> <p>When sports facilities are designed in as part of an employment park e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to.</p> <p>Also, it should not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football e.g. Football First, or a gymnastics club D2 use, than a 500,000m2 B8 use.</p> <p>In conclusion, Sport England wishes the London Plan to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well</p>
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		as inputting into the local economy. Therefore, they should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this Plan.
Chapter 8 – Green Infrastructure		
Policy G2 Green Belt & 8.2.1: Multi-functional uses of Green Belt.	Object	One of the key roles of Green Belt land is to provide opportunities and facilities for outdoor sport. It is therefore recommended that the supporting text is amended as follows: <u>'London's Green Belt makes up 22 per cent of London's land area and performs multiple beneficial functions for London, such as combating the urban heat island effect, growing food, and providing space for outdoor sport and recreation.'</u>
Policy G3 Metropolitan Open Land	Object	MOL provides important spaces to accommodate facilities for outdoor sport and recreation in London; these facilities help support the health of Londoners by providing opportunities to lead more active lifestyles. In order to make best use of land and support the health of London's population it is necessary to locate sport and recreation facilities on MOL. It is therefore recommended that the supporting text provides clarity that facilities for sport and recreation are one of the appropriate range of uses of MOL and should be supported.
Policy G4 – Local Green and Open Space	Object	Sport England objects to policy G4 as the policy does not give sufficient protection to playing fields as currently afforded to them in Government policy (see paragraph 74 of the National Planning Policy Framework. Sport England is concerned that bullet points C and D of this policy could result in the loss of sports facilities, including playing fields (see comments in Table 8.1 below). In addition, the policy does not allow for open space or playing field to be replaced with built sports provision (see final bullet point of paragraph 74). It is important to note that artificial pitches are playing field and therefore should also be protected from loss in the London Plan. This could be addressed with the following changes to the text;

		<p>C Boroughs should undertake a needs assessment of local green and open space to inform policy. Assessments should identify areas of public green and open space deficiency, <u>using the categorisation set out in Table 8.1 as a benchmark for all the different types required.</u> <u>Additional guidance will be provided in the Mayor's Supplementary Planning Guidance on the All London Green Grid.</u></p> <p>D 'The loss of green and open spaces including <u>sports and recreational buildings and playing field</u> should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better <u>provision in terms of quantity and quality in a suitable location</u> provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary. <u>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements OR the development is for alternative sports and recreational provision, the needs for which clearly outweighs the loss.</u></p> <p>Additional text as further bullet point E 4);</p> <p><u>'ensure that playing fields and ancillary built facilities are given sufficient protection from development'</u></p> <p>Alternatively, the London Plan could cover protection of playing field land under a separate policy as for trees and allotments.</p>
Table 8.1	Object	<p>Sport England is concerned that Table 8.1 provides only broad categories for all types of open space. Many sports facilities are set within these types of public open space but many are not. This is particularly important for those privately owned sports facilities that are accessible to the community and treated like public facilities in all but name. For example, many London sports facilities are set in community or private sports clubs (which are often a base for community sport activity e.g. http://www.croygassportsclub.com/ or Herne Hill Velodrome/Griffin Sports</p>

		<p>Club/Dulwich Sports Club, LB Southwark) or facilities are stand-alone artificial sports pitch or court facilities or others that are linked to built sports facilities. By providing a broad categorisation, there is a risk that these important sport and recreation facilities may not be given sufficient protection under this policy.</p> <p>For example, a Borough may have large areas of parkland and open space but insufficient sports provision and playing fields; under the policy as proposed sports facilities could therefore be put at risk from other types of development, as they could be considered surplus to requirements under this policy. The policy also fails to take account of movement across Borough boundaries. For example, people will often travel further to access some specialist sports facilities. Or some Boroughs provide sports facilities that are well used by residents from other Boroughs that have less provision. For example, many of the inner London Boroughs have limited space to provide sports facilities and therefore their residents rely on other Boroughs for access to sports provision.</p> <p>Sport England suggests that Table 8.1 is removed and provided in supplementary guidance as a way in which Boroughs could review open space provision alongside other strategies, such as Playing Pitch Strategies and Built Sports Facilities Strategies. This document could explore in further detail how playing field provision can be considered alongside other open space use.</p> <p>Sport England has suggested additional text for Policy G4 and Policy S5 to help provide the additional protection to built sports facilities and playing fields which is not included in the Plan as drafted.</p>
Paragraph 8.4.1	Support	<p>Sport England welcomes the reference to increasing connectivity across the network of green and open spaces. This will make an important contribution towards increasing physical activity through walking and cycling. The London Borough of Tower Hamlets has produced a 'Green Grid' strategy that seeks to connect its open spaces.</p> <p>The GLA should consider whether linking a green grid across the London Boroughs could help cross-borough cooperation.</p>

Paragraph 8.4.2	Support	Sport England welcomes the reference to playing pitch strategies in informing Borough's green infrastructure studies.
Paragraph 8.4.4	Object	Proposals to enhance green and open spaces that support sport and physical activity (through recreation) should be encouraged. It is essential that green and open spaces continue to provide facilities for sport. The following text should be added; '... Examples could include improved public access for all, inclusive design, <u>sport and recreation</u> facilities, habitat creation, landscaping improvement or flood storage.'
Policy G5 Urban greening	Comment	Sport England considers that further guidance may be required to inform the use of the urban greening factor. For example, the policy could potentially make projects by community groups for replacement community sports facilities or new artificial sports pitches unviable if it results in significant additional cost being levied on those applications. How this policy is applied to ensure that these developments can come forward without charges/measures that cannot be afforded?
Chapter 11 – Enabling Infrastructure		As set out in paragraph 5.5.2 there is already significant unmet demand for built sports facilities, which may continue to increase over the plan period if new facilities are not provided. There is also no mention in the green infrastructure section of funding outdoor sports facilities or ancillary facilities to encourage sport and activity in London's green spaces. In light of these infrastructure requirements, Sport England would like to see the Mayor to include support for specific new sports facilities within the 123 list and acknowledged in the plan as infrastructure that is required to meet the needs arising from new development.
Chapter 12 – Monitoring; Policy M1 and accompanying text including 12.1.3	Object	Sport England is concerned that the GLA has chosen to remove KPIs measuring the provision of sports facilities. The provision of sports facilities should be included as a KPI under health. As a minimum there should be no net loss of sports facilities. As identified in paragraph 5.5.2 there is already significant unmet demand for built sports facilities, which is projected to increase over the plan period and therefore this should continue to be a focus for the Mayor's policies.
Table 10.6	Comment	There is a typo – Sports-England. Also the title of the relevant document should be included.

