

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** Fw: Sport England representations to the Draft London Plan  
**Date:** Wednesday, September 23, 2020 10:07:57 AM

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**From:** [REDACTED]  
**Sent:** 20 September 2018 13:51  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** RE: Sport England representations to the Draft London Plan

Thanks [REDACTED] we'll do that.

Kind regards

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 20 September 2018 12:39  
**To:** [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
**Subject:** FW: Sport England representations to the Draft London Plan

Hi [REDACTED]

This is really helpful thank you. I've cc'd [REDACTED] for awareness as [REDACTED] has been reviewing our link senior links between [REDACTED] & [REDACTED] and the Mayor/GLA/London Sport, and working with [REDACTED] regarding London Sports role to support F&P activity in future.

Also, could you share a quick note on your link up with [REDACTED] at London Sport, and how they are currently offering to assist with planning work following your meeting next Wednesday. Be good to get a latest understanding when appropriate, and do flag any issues/concerns.

Thank you

[REDACTED]

[REDACTED] Local Pilots and Priority Places Manager **T:** [REDACTED]  
We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by

emailing [Gail Laughlan](#)

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**From:** [REDACTED]  
**Sent:** 20 September 2018 12:23  
**To:** [REDACTED] >  
**Cc:** [REDACTED]  
<[REDACTED]>  
**Subject:** FW: Sport England representations to the Draft London Plan

Dear [REDACTED]

Thanks for your email and the catch up earlier this week. I've attached Sport England's representations on the London Plan. We're meeting the GLA planners to discuss these again on the 5<sup>th</sup> October. The public inquiry is taking place early next year and it is likely we will be appearing to highlight some of the issues we have raised. The GLA has made some minor changes to the Plan but the majority of the issues we have raised (summarised below) haven't been addressed.

If you have any further questions about this do ask [REDACTED] or me,

Kind regards

[REDACTED]

[REDACTED] Planning Manager T: [REDACTED]

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**From:** [REDACTED]  
**Sent:** 17 May 2018 09:34  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
[REDACTED]  
**Subject:** Sport England representations to the Draft London Plan

Dear [REDACTED]

It was good to speak to you about Sport England's comments on the London Plan yesterday.

As discussed, Sport England meets quarterly with the following national governing bodies as part of the London Pitch Sports Group; England & Wales Cricket Board, Football Association (represented by the Football Foundation), Rugby Football Union, England Hockey, Lawn Tennis Association, Baseball Softball UK and others (The GLA, London Sport and London Marathon Charitable Trust also attend these meetings).

Some may have also made their own representations to the plan but some of the sport national governing bodies did not comment directly as they are relying on us to make the case on their behalf, as they all provided comment on our draft response. I should explain that we also seek to represent a much wider range of sports than the above and also have reflected upon the role of physical activity in preparing our responses.

A copy of our representations are attached. These are set against the individual policies and supporting text in line with the consultation process. As discussed, I said I would summarise some of the key issues for us that I mentioned over the phone and that we would like to discuss further with you;

- **Meeting current and future needs for sport (Policy S5)** – The supporting text underlines that in London that there is unmet demand for all types of sports facilities. This finding, in relation to built sports facilities (paragraph 5.5.2 in the draft Plan), was supported by the Facilities Planning Model work undertaken by the GLA in partnership with Sport England. Sport England would like the plan to go further in its encouragement for local authorities to plan strategically for new sports facilities (for example, through a built sports facilities assessment). Given the significant amount of need identified other policies in the plan should seek to protect existing facilities and also be more encouraging towards applications that include sports facilities that will directly contribute to health and wellbeing of new communities.
- **Provision of built sports facilities on existing playing fields** – Paragraph 74 (and the emerging NPPF) make provision for built sports facilities to be located on existing playing fields. If a local authority or community group is looking to provide a new artificial pitch, a tennis court, a multi-use games area, a new leisure centre or similar it will often be on the site of an existing sports facility. Sport England's Playing Fields Policy and the NPPF makes provision for this. We are concerned that some of the policies in the emerging London Plan do not allow for this and we have highlighted these.
- **Protection for playing fields and built sports facilities** – Sport England has made a number of objections to the policies and supporting text in the Social Infrastructure section. Playing fields and built sports facilities require special protection and are given that by the NPPF and Sport England are also a statutory consultee on applications affecting playing field. We are concerned that as currently worded the policies have the potential to encourage Boroughs to locate new schools and health care facilities on playing fields and other built sports facilities.
- **Securing planning permission for sports lighting** - Sport England is concerned that some of the policies and supporting text (D12/D13/S5) may make it difficult to secure permission for sports lighting on artificial pitches and courts in some locations. Securing planning permission for sports lighting is already difficult in some Boroughs (the LTA has some evidence of this) but floodlighting is essential to provide local communities with evening use of sports facilities, thus contributing to the community's health and well being. The London Plan should encourage Boroughs to permit sports lighting whilst giving consideration to neighbours and biodiversity in a balanced way and this could be helped with guidance on this.
- **Playing Pitch Strategies** – Sport England welcomes the references to Playing Pitch Strategies in the plan but we are concerned about how these will sit alongside the other Green Infrastructure strategies promoted in Chapter 8 and we would welcome a further

conversation about how the GLA considers this will work. Also some Boroughs (see comments on Table 8.1) provide sports facilities that are used by residents of other Boroughs, we would like to discuss with you further how we can help Boroughs best consider cross Borough boundary issues in relation to sport.

- **Active Design** – Sport England would like to better incorporate our Active Design guidance in the London Plan and our emerging thinking on how to create more active environments. We'd like to see a reference to this document in the London Plan and work with you to further promote the principles in the guidance (some of which are already included in the TFL Healthy Streets for London document. We would also like to discuss further our emerging work in this area as it applies to London.

I am grateful to you agreeing to meet with us in early July to discuss issues relevant to sport and recreation. These are the dates that we are available; 2<sup>nd</sup> July, 4<sup>th</sup> July, 16<sup>th</sup> July, 18<sup>th</sup> July and 19<sup>th</sup> July.

Notwithstanding, I am also concerned that if we don't seek to resolve some of the above with you before any proposed modifications are published then will it be too late to amend these policies and address the above issues?

I will give you another call next week to see if you have had the opportunity to look over our representations and we can discuss further,

Kind regards

[Redacted]

[Redacted]

Planning Manager

T: [Redacted]

[Redacted]

Sport England



This girl can



National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR



