



New Southwark Plan Examination in Public

Provided by:
Laura Hutson MRTPI
21B Bloomsbury Street,
London, WC1B 3HF

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1. Introduction

- 1.1. On 5th March 2019, Sport England submitted an objection to the New Southwark Plan regarding Policy P44. This was submitted by Mrs Vicky Aston MRTPI who has since left the organisation.
- 1.2. On 28th October 2020 Sport England submitted a further objection regarding Policy P44. This was submitted by Ms Laura Hutson MRTPI. I hold a Master of Arts in Urban and Regional Planning (University of Westminster). I have been a member of the Royal Town Planning Institute since 2017 and have complied with the RTPI's professional code of conduct when preparing this statement.
- 1.3. I have been working as a professional town planner since 2013. I became a Planning Manager at Sport England in July 2016. Prior to joining Sport England, I worked as a planning officer in Local Government for the London Borough of Tower Hamlets and the London Borough of Croydon.
- 1.4. The purpose of this statement is to clarify Sport England's position in respect of the following planning policy matters:
 - Part 3 of Policy P44 of the New Southwark Plan
- 1.5. This statement therefore follows on from the representations provided by Mrs Aston and my previous representation.

2. Sport England's position

- 2.1. Sport England objects to policy P44. We consider that modifications are necessary in order for the policy to meet the tests of soundness, namely ensuring that it is consistent with national policy
- 2.2. While policies P45 and P46 also deal with leisure and community uses, P44 specifically mentions sport facilities and therefore I have focused on this one.

Policy P44 – Healthy Developments

This policy states: *Development must: 1. Be easily accessible from the walking and cycling network; and 2. Provide, or support opportunities for healthy activities; and 3. Retain or re-provide existing health, community, sport and leisure facilities. 2. Development will be permitted where it provides new health, community, sport and leisure facilities. 3. In exceptional circumstances, health, community, sport and leisure facilities can be replaced by another use where there are currently more facilities than needed. This must be demonstrated by a marketing exercise for two years, immediately prior to any planning application. This should be for both its existing condition and as an opportunity for an improved health, community or leisure space at market rates.*

- 2.3. It is Sport England's view that Part 3 (bold) of Policy P44 is inconsistent with Paragraph 97 of the National Planning Policy Framework (NPPF), which 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.

- 2.4. The NPPF does not allow for the 'exceptional circumstances' referred to in Part 3 of Policy P44 where sport and leisure facilities are concerned, nor does it allow for these to be demonstrated by a marketing exercise.
- 2.5. The NPPF does allow for the loss of sport and leisure facilities where an assessment has been undertaken which has clearly shown them to be surplus to requirements. The London Borough of Southwark have developed a Playing Pitch Strategy (2017) (Appendix 1) which includes a thorough assessment of the borough's playing fields and ancillary facilities and complies with Sport England guidance. Reference to this document would be extremely helpful as it represents a robust and relatively up to date assessment.

3. Conclusions

- 3.1. This statement has been provided to follow on from Sport England's previous representations objecting to Policy P44.
- 3.2. Sport England considers that the suggestion that 'exceptional circumstances' around the potential loss of sport facilities can be demonstrated by a marketing exercise should be removed in order to comply with national policy. This should be replaced with a reference to a robust and up to date assessment such as the London Borough of Southwark's Playing Pitch Strategy.

Appendix 1 – Southwark Playing Pitch Strategy

<https://www.southwark.gov.uk/leisure-and-sport/sport-and-physical-activity-strategy>