

Statement of Common Ground between London Borough of Lambeth and Sport England

15 May 2020

Context

This is a statement of common ground between the London Borough of Lambeth and Sport England to support the examination of the Draft Revised Lambeth Local Plan Proposed Submission Version (DRLLP PSV) January 2020 and associated Proposed Changes to the Policies Map (PCPM) January 2020.

Lambeth published the DRLLP PSV and PCPM under Regulation 19 of the Town and Country Planning (Local Plans)(England) Regulations 2012 between 31 January and 13 March 2020.

Sport England submitted a representation under Regulation 20 of the same regulations on 13 March 2020 (R007).

Lambeth's response to Sport England's representation

Lambeth has considered each of Sport England's comments on the DRLLP PSV. Lambeth's response is set out in Appendix 1 of this statement. Some changes to the wording of the DRLLP PSV are proposed (shown in red), also included in Appendix 1.

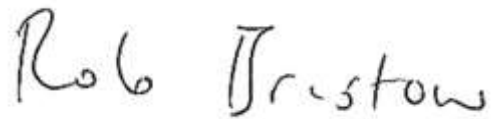
Sport England response to Lambeth

Sport England welcomes the changes in wording set out in Appendix 1 of this statement and looks forward to working with Lambeth to ensure the Local Plan evidence base is robust and up to date with regard to sport provision. It is happy to withdraw these elements of its previous objection.

Statement of agreement

LB Lambeth and Sport England agree the position set out in Appendix 1 of this statement. Lambeth will therefore put forward the proposed changes to wording during the examination of the DRLLP PSV.

Signed for London Borough of Lambeth by:



Rob Bristow

Director Planning Transport and Sustainability

London Borough of Lambeth

Date: 14/05/20



Raj Mistry

Director Environment and Street Scene

London Borough of Lambeth

Date: 13/05/20

Signed for Sport England by:



Bob Sharples

Principal Planning Manager

Sport England

Date: 6/5/2020

Appendix 1

Item	Sport England comment	LB Lambeth response	Proposed action
1	<p>With regard to policy S1, Sport England welcomes the inclusion of a sentence stating that sports facilities should be tested against paragraph 97 of the NPPF and supports the Council’s intention to protect sports facilities (where they are considered social infrastructure) from development. Sport England does however wish to highlight the fact that the provision of a ‘payment in lieu’ is not considered consistent with the NPPF paragraph 97. In a borough such as Lambeth there will often be difficulty in identifying a site where providing replacement facilities is feasible, meaning that spending the payment in lieu appropriately is not always possible – therefore, if a replacement facility cannot be provided, planning permission should not be granted as it will lead to the loss of a playing field or facility with no replacement. Paragraph 97 of the NPPF states that replacement provision needs to be equivalent or better in terms of quality and quantity in a suitable location. It is not possible to meet this test with a payment in lieu.</p>	<p>The supporting text can be amended to clarify that policy S1 applies to indoor sports and recreation facilities and that outdoor sports and recreation facilities including playing fields will be considered under policy EN1. This can also be clarified in the supporting text to EN1. Payments in lieu are not allowed for under EN1.</p>	<p><i>Amend para 7.4 as follows (new text in red):</i></p> <p><u>Local Plan policies</u> Policies S1 and S2 apply to facilities in the D1 and D2 use classes such as healthcare, childcare, higher, and further <u>and adult</u> education, training, community halls and meeting spaces, libraries, indoor play, <u>indoor</u> recreation and sports facilities and places of worship. They also apply to other public service uses (such as fire, ambulance, policing, criminal justice and community safety facilities) which are not in a given use class and are categorised <i>sui generis</i>. Local shops, cafes, pubs, post offices and markets are covered by the policies in section 6 of this plan, as they fall within the ‘A’ use classes. <u>Outdoor sport facilities and playing fields will be considered under Local Plan policy EN1.</u></p> <p><i>Add as new para 7.25:</i></p> <p><u>Proposals involving the loss of school playing fields will be considered under Local Plan policy EN1.</u></p>

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2	<p>I note that in the Council's response to our previous comments Policy EN1 was pointed to as providing adequate protection instead. It is not considered that policy EN1, which deals with open space rather than playing fields specifically, provides adequate protection to playing fields as it is clearly intended to deal with open space rather than playing fields specifically, and therefore also does not meet the tests of the NPPF in paragraph 97. For instance, it allows the loss of open space in housing estate amenity areas where regeneration and other community benefits can be achieved - this would not provide adequate protection to playing fields or other sport facilities and is not in line with the NPPF.</p>	<p>The definition of open space in the supporting text of policy EN1 can be clarified to include explicit reference to playing fields.</p>	<p><i>Amend 1st sentence of para 9.5 as follows (new text in red):</i></p> <p>Existing <u>public and private</u> open space includes Metropolitan Open Land, common land, historic parks and gardens, district and local parks, nature conservation areas, play areas and adventure playgrounds, outdoor sports facilities and playing fields, allotments, cemeteries and burial space, amenity land <u>areas</u> within housing estates, communal squares and gardens, <u>roofs that are fully accessible to the public as open space (not private amenity space)</u>, <u>areas of water</u>, and the River Thames Foreshore and Thames Path in accordance with London Plan policy.</p>
3	<p>Sport England also wishes to make a more general point around the local plan evidence base. Sport England understands that, in response to its previous comments, it has been made clear that the Lambeth Physical Activity and Sports Strategy 2015-2020, Lambeth Indoor Sports Facilities Strategy and Action Plan 2015-2020 and Lambeth Outdoor Sports Facilities Strategy and Action Plan 2015-2020 have been used to inform and are referenced in the Infrastructure Delivery Plan, which is part of the Local Plan evidence base. Sport England is therefore extremely disappointed that there</p>	<p>The current Lambeth Leisure Services contract expires 31 March 2022 and the delivery method from April 2022 is under review. To support this, Lambeth will start work in the first quarter of 2021/22 on production of an updated Playing Pitch Strategy which will incorporate an updated outdoor sports facility strategy, in accordance with Sport England guidance. A separate built structures strategy will also be produced. These documents will be completed by</p>	<p><i>Update the references in the Lambeth Infrastructure Delivery Plan to include the current Lambeth Playing Pitch Strategy Assessment 2014 and Lambeth Physical Activity and Sports Strategy 2015-2020, and include a statement that these will be reviewed by March 2022. An updated version of the Infrastructure Delivery Plan incorporating these changes will be published in May 2020.</i></p>

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	<p>appears to be no plans (that it is aware of) to update these documents, which will rely on data collected no later than 2015 and are therefore significantly out of date. As stated previously, updated versions of these documents should be used and Sport England wishes to support the council in reviewing these documents and ensuring that the Council has a robust and up to date evidence base for the local plan. The NPPF states that planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.</p>	<p>March 2022. This approach has been discussed with London Sport. Lambeth welcomes the commitment of Sport England to support this process.</p>	