

Tell us who you are

Ref: R007

Title

Ms

First name

Laura

Surname

Hutson

Email address

laura.hutson@sportengland.org

Agent's details

Are you an agent?

Yes

No

Personal details

Title

Ms

First name

Laura

Last name

Hutson

Job title (optional)

Planning Manager

Organisation (optional)

Sport England

Address

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WC1B 3HF

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07769881525

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laura.hutson@sportengland.org

Your representation

Please complete this set of questions for each representation you wish to make.

To which part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 does this representation relate? (identify specific reference if possible)

- Paragraph number
- Policy number
- Policies Map - map and/or table number

Please state policy number

S1

Do you consider the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above is:

Legally compliant

- Yes
- No

If you wish to support the legal compliance of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Sound

- Yes
- No

For which of following reasons do you consider that the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 you identified above, is unsound:

- It is unsound because it is not positively prepared
- It is unsound because it is not justified
- It is unsound because it is not effective
- It is unsound because it is not consistent with national policy

Please state why it is not consistent with national policy

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.

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.

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 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.

Complies with the Duty to co-operate

Yes

No

If you wish to support the compliance with the duty to co-operate of the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, please give details

(optional)

Please set out what change(s) you consider necessary to make the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, legally compliant or sound, having regard to the tests of soundness if applicable. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination.)

(optional)

It should be made clear that the provision of a payment in lieu is not acceptable where playing fields or other sports facilities are concerned.

The process of entering into a new Playing Pitch Strategy and Built Facilities Strategy should also begin in order to provide a robust and up to date assessment as referenced in the NPPF and in order to ensure that the Local Plan evidence base is up to date.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify your representation and your suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he/she identifies for examination.

If your representation is seeking a change to the part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020 that you identified above, do you consider it necessary to participate at the oral part of the examination?

No - I do not wish to participate at the oral examination

Yes - I do wish to participate at the oral examination

Please note that while this will provide an initial indication of your wish to participate in hearing sessions(s), you may be asked at a later point to confirm your request to participate.

Please outline why you would like to participate at the oral examination

In order to be fully involved in any discussion around the proposed policies protecting sport and ensure that playing fields and sport facilities are provided with adequate protection in the Lambeth Local Plan. Sport England would also like to be involved in any discussion around the development of a new Playing Pitch Strategy and Built Facilities Strategy.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Your representation 2

Do you want to submit a further representation for another part of the DRLLP PSV Jan 2020 or associated PCPM Jan 2020?

Yes

No

Require further notification

Please tick relevant boxes if you require notification of any of the following to the address stated previously in personal/agent details

(optional)

- That the DRLLP PSV Jan 2020 and associated PCPM Jan 2020 have been submitted for independent examination
- The publication of the inspector's recommendations following the independent examination
- The adoption of the Revised Lambeth Local Plan and Policies Map.

Review your answers

Review your answers

Before submitting your form you can review all of the answers you have given so far by clicking on the link below.

[Open a read only view of the answers you have given \(this will open in a new window\)](#)

Declaration

By submitting this claim you are agreeing to the following declaration. To view this declaration please click on the link below

I declare that the information I have provided on this form is accurate

Now submit your form using the submit button below.