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New London Plan
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LPFF CONSULTATION RESPONSE ON THE DRAFT NEW LONDON PLAN

Dear Mr Khan,

Thank you for consulting London Playing Fields Foundation (LPFF) on the draft New London Plan.

We welcome the opportunity to comment on the document regarding playing field protection and how the London Plan policies can be improved and strengthened prior to the final publication. We are however concerned that there is very little direct reference to playing fields and minimal protection if sites are outside the Green Belt or Metropolitan Open Land designations. Some of the policies and language need to be strengthened to reflect the recognition that playing fields make a major contribution to increasing sport and physical activity and wider social and health outcomes.

LPFF is a registered charity founded in 1890 and granted a Royal Charter in 1925. It is the main charity for the provision, protection and promotion of playing fields in greater London and over the past 128 years the LPFF have built up extensive knowledge and operational experience in running sports grounds and providing a range of sports development opportunities. We operate seven playing fields (200 acres) across the capital and continue to work with and provide advice to a variety of strategic organisations including GLA, Local Authority partners, Sport England, London Sport, National Governing Bodies of Sport, London Marathon Charitable Trust, Football Foundation and a variety of NHS Trusts.

LPFF has recently produced a Playing Fields Charter for London that sets out a vision for playing fields in London and aims to provide a position statement for individuals and organisations involved in the provision, promotion and protection of playing fields in the capital. Given the lack of sites, accessing the opportunity to play sport in London is different to any other part of the country and there needs to be a long-term view on how these places that play such a key role in widening, increasing and sustaining participation are protected and well used.

By adopting a strategic approach, we advocate the need for better protection of playing fields to safeguard them for current and future generations of Londoners and are working with a range of key partners to reverse the cycle of playing fields decay.



A Charter for Playing Fields in London

We believe that sport can transform lives and to achieve this we need to ensure those places where it is played are protected and fully used.

PROTECT

1. Use the planning system to protect against the loss of playing field sites at risk from development.
2. Establish a continuously updated Fields at Risk Register for London.
3. Encourage local authority planning departments to adopt housing policies that do not result in a net loss of sports pitches.
4. Advocate that each local authority has a robust and up to date assessment of the needs and opportunities for playing fields in their area as part of their local plan
5. Work with DfE to ensure there is no reduction in school sports pitch provision in London.

PROMOTE

6. Promote the wider health and social benefits of well managed playing fields.
7. Inspire an increase in participation in sport and physical activity through better utilisation of playing fields and artificial turf pitches.
8. Adopt a strategic pan London approach to sports pitch provision recognising inequality of access between inner and outer London boroughs and the demand for facilities by users crossing borough boundaries.
9. Raise the awareness of funding opportunities relating to playing fields and their improvement.

PROVIDE

10. Improve and sustain the quality of existing sports pitches for present and future generations of Londoners.
11. Create a single city-wide hub for playing fields information in London to improve the awareness of where sites are located, who uses them and how often.
12. Offer support to those seeking to invest in playing field improvements.

We believe that the best form of protection is full use. Once a playing field is lost to development it is lost forever. In the past national policies on planning for and on protecting playing pitches and other outdoor sports facilities have attempted to strike a balance between the general desire to protect playing fields and a pragmatic recognition that in some circumstances there may be a justification in sanctioning disposal of all or part of the site. This balance however has not always succeeded in protecting valuable playing fields and grass pitches, particularly in London where



land values are high. We therefore welcome the general objective to protect and enhance London’s Green and Open spaces that help to define the unique character of London.

However, community playing fields are inherently loss making and as such there has been and continues to be a lack of investment in their modernisation, management and maintenance. This, coupled with the recurring budget deficit position within local government (that own 85% of playing field stock), is placing a premium on the potential loss of fields to development.

Selling off a playing field can provide local authorities with the triple benefit of realising a capital receipt, meeting government housing targets and removing a huge recurring maintenance obligation. We believe that there are inadequate protective measures and no clear definitive position on the actual loss of playing fields across the capital and beyond.

Evidence of loss

The GLA Offside Report (2006) concluded that there had been a significant decline in the number of playing fields in London over the previous 15 years and the response to the loss of sites was often too late. But this document is 12 years old and despite its recommendation to do so there has been no comprehensive, accurate up to date assessment on playing fields across the capital.

LPPF recommends that the GLA commission an updated pan London Playing Field Audit like the 2006 Offside Report. This document can then be used as a benchmark on the diminishing stock of playing fields, and provide an evidence base to protect existing sites.

Total grass pitches in London for major pitch sports

	London	Nationally	% in London
Full sized Football	1961	22082	8.9%
Junior Football	1048	13977	7.5%
Mini Soccer	620	6891	9.0%
9 v 9	36	344	10.5%
Cricket	685	8663	7.9%
Senior Rugby Union	503	6205	8.1%
Junior Rugby Union	99	1224	8.1%
Mini Rugby	24	450	5.3%
Hockey	39	948	4.1%
TOTALS	5015	60784	8.3%

Source Active Places Power Sport England 2018

Overall there are 70,826 grass pitches in England 8% of which are in London to service the needs of 14% of the population.



Public information on where to play sport is readily available through a variety of sources including the Sport England Active Places database. However, this is mainly used as a business to business tool and not by the public. New partnerships need to be created with technology companies and other data rich companies to provide information to sport and physical activity providers on their local market particularly playing fields.

Within the LPFF Playing Fields Charter for London it calls for the creation of a single city-wide hub for playing fields information in London to improve the awareness of where sites are located, who uses them and how often. We have included an advanced copy with this response. We would also like to discuss the possibility of creating a data hub for playing fields information in collaboration with the GIGL/GLA and to seek LPFF representation on the London Green Spaces Commission (as recommended in the Environment Strategy) once it is established.

Whilst we fully support the need to maintain accurate up to date information, we recognise that there is a lack of reliable information to provide the evidence required by planning authorities. As there is no “early warning system” for threatened sites the intervention to safeguard the long-term future of a playing field often arrives too late. It would be possible to highlight from an electronic database those playing fields most at risk and to take the necessary steps to remove the threat and begin the process of restoring them to full use.

London pitch losses by sport since 1990

LOCAL AUTHORITY	Adult Football		Cricket		Rugby Union		Hockey	
	1990	2018	1990	2018	1990	2018	1990	2018
Barking & Dagenham	85	61	20	9	9	12	4	0
Barnet	142	118	68	42	20	38	21	2
Bexley	58	57	27	16	13	21	12	3
Brent	86	58	48	17	11	5	7	0
Bromley	172	153	102	58	51	57	31	6
Camden	20	1	13	2	4	1	4	0
City of London	0	0	0	0	0	0	0	0
City of Westminster	16	11	6	9	0	3	2	0
Croydon	94	83	34	31	13	20	7	4
Ealing	135	68	53	36	21	21	16	0
Enfield	154	141	48	33	8	24	11	4
Greenwich	146	88	62	19	23	19	21	0
Hackney	109	66	30	5	11	11	2	0
Hammersmith & Fulham	58	27	4	6	4	4	1	0
Haringey	51	35	22	16	3	2	4	0
Harrow	81	73	47	47	6	20	3	1
Havering	103	81	32	22	9	22	9	1
Hillingdon	116	95	37	27	27	25	22	1
Hounslow	130	91	67	22	48	39	25	2
Islington	5	3	3	1	0	1	1	1
Kensington & Chelsea	5	3	2	2	0	0	1	0
Kingston Upon Thames	86	93	42	32	22	10	13	0
Lambeth	51	11	16	4	0	1	3	0
Lewisham	80	48	28	9	6	6	16	1
Merton	189	49	85	29	57	30	24	0
Newham	76	38	17	9	1	2	0	0
Redbridge	109	114	52	48	10	13	9	1
Richmond Upon Thames	85	76	47	44	33	54	21	4
Southwark	21	48	27	26	8	8	4	0
Sutton	86	40	25	18	10	11	5	6
Tower Hamlets	9	18	1	0	0	1	0	0
Waltham Forest	71	64	36	22	9	9	4	2
Wandsworth	74	49	27	24	3	23	9	0
TOTALS	2703	1961	1128	685	440	513	312	39

Source Active Places Power Sport England 2018

It is worth reinforcing again that London has 14% of the country’s population and only 8% of its playing fields yet it has been steadily losing its stock of pitches.

Recreational cricket is particularly under threat. Over the last 20 years London has lost over 41% of its natural turf wickets and last year the ECB reported a 7% drop in participation. Very few state schools have their own grass cricket pitches and it is not surprising therefore that only 10% of schools currently playing competitive cricket. A pan London audit will identify where the remaining 685 pitches are located and what needs to be done to arrest and reverse the decline in provision and participation rates.

There is a close correlation between participation rates and the availability and cost of local facilities and the already challenging situation in London has been compounded by the need to find the space to build 649,350 new homes by 2029. Taking a more strategic view on how London's current stock of pitches can be protected and saved for current and future generations of Londoners is essential. More people need more space not less.

Making playing fields work

Our work fully reflects the role that well managed playing fields and the sport played on them can play in improving health and well-being, bringing communities together, reducing anti-social behaviour and raising employment and educational aspirations.

We work with the GLA, Local Authorities, Sport England, National Governing Sports Bodies and London Sport in providing a strategic response to playing fields protection and investment. Whilst we cannot change the past and reclaim lost playing fields we can influence their future and ensure community playing fields are better used by local people. We therefore support our partners across London to stimulate demand and address barriers to participation such as accessibility, cost, quality, transport and a lack of joined up thinking.

We think that there is great potential for public private sector partnerships in the management of green spaces. LPFF has two such innovative partnerships, one with Powerleague a commercial five-a-side operator and the other with GLL who manage and operate an indoor leisure centre on one of our grounds. Both these schemes pay LPFF a ground rent which is used to cross subsidise the losses from grass pitch hire.

In formulating new investment models outside of the public sector, it must be remembered that playing field provision is inherently loss making and requires separate income drivers to cross subsidise activity. LPFF as a charity has direct experience of using a range of different models to make playing fields work. These include co-location of artificial grass pitches, leasing pavilions to children's nurseries, sharing sites with commercial five-a-side operators in return for a ground rent and providing a lease to commercial leisure operators to support grounds maintenance and operational running costs. We also accrue income from telephone mast rentals which contributes to the running costs of the facilities.

Consideration should also be given to private sector investment into sport and recreation at grass roots. In our experience this type of joint venture provides benefits to both parties and further models should be explored at a time when the more traditional local government providers of green spaces are facing severe financial restrictions.



Value of playing fields

Playing Fields are expensive to maintain but provide the green lungs of our cities, both for informal recreation and organised sport. Increasingly they need to be protected for future generations against a backdrop of the enormous pressure to provide more housing. The Government clearly has a role to play through the planning system but should also follow the Finnish model of sport and health which is viewed collectively in policy and funding terms to address the escalation of obesity, coronary heart disease and diabetes that threatens to engulf the nation.

London is becoming an increasingly sedentary city with over 50% of the adult population classified as inactive and one in three children in the capital being overweight or obese. The costs of this crisis are enormous. Inactivity costs the nation £162 per second and alarmingly one in six people will die because of inactivity. For those of us who work in sport getting more people to be more active must be a priority. Places to play help to alleviate this time bomb.

This is particularly prevalent in London where the population is younger than in the rest of the UK with nearly two thirds (63%) of Londoners aged under 44, compared to just over half (53%) in the UK. The capital's residents are overwhelmingly young - 31% are under 24 years old, with the birth rate expected to rise over the next 20 years. It is this group who are more likely to use playing fields.

The continued use and access to playing fields and green spaces are critical for our young people. More than one in five (22%) of London children aged 10-11 years old is at risk of being obese; this is above the average for England (18%).

It is therefore reassuring that the main goal in the capital is to increase the number active Londoners to one million by 2020. However, to achieve this and the various NGB targets, London needs to make better use of the places where this increased activity can take place. For the major pitch sports this entails ensuring that there is more and better access to affordable and attractive facilities where they can grow the game. Supply drives demand and playing fields, through well managed partnerships between schools and clubs, can play their part by initiating and sustaining a sporting habit for life. Providing clubs with the two things they need to flourish, namely somewhere to play the game and somewhere to practise, effectively gives them a home base from which to recruit new players and volunteers.

More importantly the value of playing fields to society extends beyond the pitch. With knife crime at its highest level for six years with a 47% rise in London - 35 young people aged under 25 have been killed with more than 13,000 offences committed in London in the last 12 months – is it not better for young people to be members of sports teams rather than gangs?

Protecting a finite resource/ more effective protection measures

It is widely acknowledged that the best form of playing field protection is full use but first we need an accurate understanding of what London currently has. The Fields at Risk Register kept by London Playing Fields Foundation is a reactive record rather than a pre-emptive measure against possible playing fields loss. The most recent audit, the Greater London Assembly's report "Offside" (2006) asserted that "there has been a significant decline in the number of playing fields in London over the last fifteen years and the response to the loss of sites is often too late. It

recognised that because of the wide range of owners and a lack of data, quantifying the loss of sites is a complex task.

In this context, it is very difficult therefore to protect what we have, when we cannot identify the actual supply of grass pitches. Increasingly the major providers of grass pitches in London, local authorities (LA's) are being asked to undertake Playing Pitch Strategies that provide a robust evidence based assessment of the current supply of playing pitches, however not all LA's have up to date assessments and those that have are not updated on a regular basis. Currently 66% of local authorities in London either have no Playing Pitch Strategy in place or have a document that is more than three years old.

Distribution of major pitch sports by London Borough

LOCAL AUTHORITY	Adult Football	Cricket	Rugby Union	Hockey
Barking & Dagenham	61	9	12	0
Barnet	118	42	38	2
Bexley	57	16	21	3
Brent	58	17	5	0
Bromley	153	58	57	6
Camden	1	2	1	0
City of London	0	0	0	0
City of Westminster	11	9	3	0
Croydon	83	31	20	4
Ealing	68	36	21	0
Enfield	141	33	24	4
Greenwich	88	19	19	0
Hackney	66	5	1	0
Hammersmith & Fulham	27	6	4	0
Haringey	35	16	2	0
Harrow	73	47	20	1
Havering	81	22	22	1
Hillingdon	95	27	25	1
Hounslow	91	22	39	2
Islington	3	1	1	1
Kensington & Chelsea	3	2	0	0
Kingston Upon Thames	93	32	10	0
Lambeth	11	4	1	0
Lewisham	48	9	6	1
Merton	49	29	30	0
Newham	38	9	2	0
Redbridge	114	48	13	1
Richmond Upon Thames	76	44	54	4
Southwark	48	26	8	0
Sutton	40	18	11	6
Tower Hamlets	18	0	1	0
Waltham Forest	64	22	9	2
Wandsworth	49	24	23	0
TOTALS	1961	685	503	39
Source Active Places Power Sport England 2018				

Ownership of grass pitches in London – major pitch sports

Type	Commercial	Community Organisation	Education	Local Authority	Others	Sports Club	Not Known	Total
Cricket	24	14	235	263	53	95	0	684
Full sized Football	97	19	539	1016	131	152	3	1957
Hockey	0	0	27	2	3	7	0	39
Junior Football	26	14	455	450	45	58	0	1048
Junior Rugby Union	0	0	59	20	2	18	0	99
Mini Rugby	0	0	7	17	0	0	0	24
Mini Soccer	10	8	181	314	59	46	0	618
Nine v Nine	1	0	2	27	4	2	0	36
Senior Rugby Union	9	6	238	131	49	70	0	503
Total	167	61	1743	2240	346	448	3	5008

Source Active Places Power Sport England 2018

A pan London audit would differ from individual local authority Playing Pitch Strategies (which tend to be restricted by borough boundaries) in that it would recognise the unevenness of playing field distribution across the capital and the fact that participants travel reasonable distances often out of the borough to play or practise the sport of their choice. For example, talented cricketers in Tower Hamlets must travel south to Blackheath (Kent) or north to Wanstead (Essex) to play on good quality natural turf pitches.

It will also provide the catalyst for better more efficient cross borough sports development programmes and, in helping pitch sport NGB's to fully understand the facility profile in London, it will in turn inform the delivery of their whole sport plan. For example, the structure of the sport of hockey has radically changed over the past 25 years with the introduction of AGP's. The number of grass hockey pitches has declined from 312 in 1990 to just 39 in 2018. The total in London represents 4.1% of grass hockey pitches across the country.

The long-term future of hockey in London has an uncertain future as hockey clubs face the prospect of losing their home pitch when the surface reaches the end of its shelf life and is replaced by a 3G version. Since 2005, 267 of the 348 new or refurbished artificial grass pitches (AGP's) in London (76%) have followed a 3G specification. As seen in the table below 70% of the current distribution of AGP's in London is 3G.



Access to artificial grass pitches in some inner London boroughs where space is at a premium is essential to create healthier, happier and active communities. For example, the redgra pitch at Barnard Park in LB Islington serves a valuable function in the absence of the availability of playing fields. Its retention for continued sport and physical activity was strongly argued by the local community when a recent planning application made by Islington Council tried to significantly reduce the playing area and turn it into a park.

This illustration serves as a reminder of the value of floodlit AGP’s in inner city areas where access to grass pitches is scarce.

Artificial grass pitches in London and England

Type	London	England
Rubber crumb pile (3G)	651	3588
Sand Dressed	56	619
Sand Filled	194	1745
Water Based	6	85
Total	907	6046

15% of Artificial Grass pitches nationally are in London.

Direct response to the Draft London Plan

Boxed statements are quoted from the Draft London Plan (DLP).

Playing fields are one of the most important resources for sport in England, as well as making a significant contribution to informal recreation, amenity and the environment. Over recent years the loss of playing fields has become an important current issue as no one knows the exact number of pitches that are lost to either development or neglect. This subject has been particularly high on the political agenda since the early 1990s and is part of a wider debate on the protection and management of urban open space in general.

LPPF is committed to working with the GLA and other partners to help improve the provision and protection of playing fields in London.

We recommend the inclusion of playing fields in the text of Policy G1 and in the following paragraphs (suggested amendments in red)

Policy G1

Policy G1 Green infrastructure

A. London’s network of green and open spaces, **including playing fields** and green features in the built environment such as green roofs and street trees, should be protected, planned, designed and managed as integrated features of green infrastructure.

B. Boroughs should prepare green infrastructure strategies that integrate objectives relating to open space provision, biodiversity conservation, flood management, health and wellbeing, sport and recreation.

C. Development Plans and Opportunity Area Planning Frameworks should:

- 1) identify key green infrastructure assets, their function and their potential function

2) identify opportunities for addressing environmental and social challenges through strategic green infrastructure interventions.

Para 8.1.1 amend the last sentence as follows... encouraging walking and cycling; and conserving and enhancing biodiversity and ecological resilience alongside more traditional functions **where** green space such as **playing fields are utilised** for play, sport and recreation.

Para 8.1.2 In highlighting the economic and social value of the green environment the LPFF mission to provide a place to play sport forever recognises that without a pitch to play on there is no sport. For sport to transform lives we need be able to measure this impact. The research undertaken by Substance in 2015 entitled Fields of Dreams provides compelling evidence of the value of playing fields to society and why we need to safeguard them for future generations. We have enclosed a copy of the Fields of Dreams report which calculated that use of the playing field at Douglas Eyre Sports Centre in Walthamstow delivered an annual minimal cost saving to the public purse of £4.8 million. The report can also be accessed via our web site www.lpff.org.uk

Para 8.1.3 we welcome the statement that the Mayor delivers on his manifesto commitment to make London at least 50% green by 2050 and to issue Supplementary Planning Guidance on Green Infrastructure Strategies. Add to this paragraph....

Playing fields are more than just parcels of open space. Used appropriately they can help people to be more physically active so that their physical, mental and social health is enhanced and they can become places where the community comes together to enjoy sport and recreation.

Policy G2

Policy G2 London's Green Belt

The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused
- 2) the enhancement of the Green Belt to provide appropriate multifunctional uses for Londoners should be supported.

B The extension of the Green Belt will be supported, where appropriate. It's de-designation will not.

We strongly agree with the continued protection of London's Green Belt and by not allowing de-designation it will inhibit the ability of local authorities to enter into land swap agreements that would, if actioned, further threaten the site. Perversely, the protection planned for the Green Belt and Metropolitan Open Land in Policy G3 may **increase the pressure** on other playing fields not afforded the same level of protection.

This latter point is important because the playing pitch distribution across London is markedly uneven and of variable quality meaning that many users have to travel to outer London Boroughs to play, football, cricket and other sports where the supply of playing pitches is greater. Unless playing fields are protected, some outer London



Boroughs with an apparent “surplus “of land may decide that they are surplus to requirements and can be sold for development.

For example, evidence from the recent Planning Inspector’s report into the Redbridge Local Plan (January 2018) where the Council attempted to change the green belt designation that would have meant building houses on Oakfield Playing Fields in Hainault, provides further proof of the need for green belt protection. The planning Inspector stated:

“Oakfield and Ford Sports Ground have an existing function as playing pitches. Because of this they can be distinguished from the two other strategic housing sites that are to be released from the Green Belt. Having considered the wider implications of not developing those sites it is concluded that exceptional circumstances do not exist to alter the Green Belt boundaries as shown in the Redbridge Local Plan.”

We therefore reiterate the need for a pan London Playing Field audit.

Para 8.2.1 Insert the word sport at line seven.
.... Providing space for **sport** and recreation.

In addition, the LPPF welcome the provision of appropriate ancillary facilities for outdoor sport and outdoor recreation as exemptions to building within the Green Belt. We also recognise that appropriate use of floodlighting for multi-use games areas, tennis courts and outdoor pitches should be included as this is often required to make the facilities sustainable in the long term. Additionally, indoor sports and leisure facilities that support loss making playing fields are also an appropriate ancillary use of green belt to provide a local community resource.

Policy G3

Policy G3 Metropolitan Open Land
A Metropolitan Open Land (MOL) should be protected from inappropriate development:
1) development proposals that would harm MOL should be refused
2) boroughs should work with partners to enhance the quality and range of uses of MOL.
B The extension of MOL designations should be supported where appropriate.
C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.
D Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:
1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area
2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London
3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value
4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria.

LPFF welcomes Policy G3 and the protection of MOL but highlights a potential risk in the expansion of MOL boundaries where appropriate, acknowledging that this would only be undertaken in exceptional circumstances as outlined in the NPPF.

We recognise that the protection and improvement of playing fields are vital and that attention needs to be drawn to the replacement of like for like or improved facilities if they are lost to development.

NO NET LOSS OF PITCHES MANTRA

LPFF has a policy position of “**no net loss of playing pitches**” and advocates the general presumption against the development, disposal or change of use of playing fields. Once a field is lost it is lost forever.

As a principle, there should be **no net loss of pitches** and no reduction in the amount of pitches available for use either for sport or informal recreation. Under use of a playing field should not necessarily be viewed as an indication of absence of need in the local area.

We also argue that if a playing field is lost to development it should be replaced by a playing field or fields of equivalent or better quantity and quality and in a suitable location. Sport England’s view is that any potential loss may also result in the substitution of other indoor facilities but whilst this may be recognised as a viable alternative, it should not replace the loss of a grass pitch.

LPFF contends that in all cases there is a need to have an up to date assessment of demand to demonstrate that playing fields are surplus to requirements and accompanied by a thorough evidence base demonstrating exceptional circumstances as suggested in Paragraph 8.3.2. But the principle remains to plan for no net loss of pitches.

Fundamentally we agree with an evidence based approach based on local, accurate and up to date information. Too often documents are outdated or fail to make the case for sustainable development. In this situation the ability of planning department officials to interpret the data and make informed decisions is compromised. Despite the need for local authorities to provide adequate, up to date and relevant evidence through local assessments and audits of existing provision, many local authorities have failed to produce a Playing Pitch Strategy that could be integrated into the local plan hierarchy.

The case for cross borough planning

Cross boundary co-operation between local authorities on strategic priorities and a duty to work collaboratively with other bodies is supported by LPFF who has long campaigned that wider than local assessments are required to accommodate the migration of sports players who often cross borough boundaries when travelling to play sport.

For this reason, we welcome the new duty to co-operate with councils working together as described in the Localism Bill. This will further aid the strategic planning of sports facilities that are provided in the right place for local people to access. However, the inability to move playing fields from one area to another means that the current stock needs to be protected and retained for future generations.



Policy G4

We recommend the inclusion of playing fields in the text of Policy G4

Policy G4 Local green and open space

A Local green and open spaces, **including playing fields** should be protected.

B The creation of new areas of publicly-accessible **playing fields, and**, green and open space should be supported, especially in areas of deficiency in access to public open space

C Boroughs should undertake a needs assessment of local **playing fields, and** green and open space to inform policy. Assessments should identify areas of public **playing fields and** green and open space deficiency, using the categorisation set out in Table 8.1 as a benchmark for all the different types required.

D The loss of **playing fields and**, green and open spaces should be resisted in areas of deficiency. If losses are proposed outside of areas of deficiency, equivalent or better-quality provision should be made within the local catchment area unless an up-to-date needs assessment demonstrates this is unnecessary.

E Development Plans and Opportunity Area Frameworks should:

- 1) include appropriate designations and policies for the protection of **playing fields and**, green and open space to address deficiencies
- 2) ensure that future **playing fields and**, green and open space needs are planned for in areas with the potential for substantial change
- 3) ensure that **playing fields and**, green and open space needs are planned in line with objectives in green infrastructure strategies to deliver multiple benefits and in recognition of the cross-borough nature of some forms of green infrastructure

The Importance of an agreed playing field definition

When defining what constitutes a playing field we feel that there should be a wider definition of playing fields so that other sports facilities such as bowling greens, athletics tracks and tennis courts are included within the playing fields footprint. This is particularly pertinent for the economic sustainability of the site in our experience and we would argue that a presumption in favour of development should also apply to the provision of ancillary facilities and floodlighting for outdoor sports facilities.

Throughout the draft London Plan we are concerned that there is a lack of reference to playing fields. One of the main weaknesses in the plan is the Open Space categorisation in Table 8.1 – Public open space categorisation. The only mention of playing fields is within the District Parks category that provides opportunities for local community provision. This hierarchy is not fit for purpose and fails to recognise the regional pan London nature of some playing field sites.

We would recommend amending the text in Table 8.1 as follows:

Open Space categorisation	Description	Size guideline	Distance from homes
Regional Parks	These are large areas, corridors or networks of open space, the majority of which will be publicly-accessible and provide a range of facilities including outdoor sports facilities and playing fields offering recreational, ecological,	400ha	3.2 to8 km



	landscape, cultural or green infrastructure benefits. They offer a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.		
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We also believe that there should be another open space category added to the hierarchy entitled Playing Fields.

Open Space categorisation	Description	Size guideline	Distance from homes
Playing Fields	These are areas of outdoor space that may have a grass or artificial surface used for sport and recreation. They can vary in size, supporting for instance one pitch in a local park up to multi pitch sites in Regional or Metropolitan parks providing opportunities for sport, physical activity and informal recreation. They can also appear as one- off sites with or without ancillary facilities.	0.2 ha and above	

For this purpose, it is very important to differentiate between a site and a playing field. We agree with the Sport England definition and assume the minimum area of 0.2 hectares. The Town and Country Planning (Development Procedure) England Order 2015 defines a playing field as “the whole of a site which encompasses at least one playing pitch.” It does not differentiate between different types of ownership or use or levels of play. The order delineates a playing pitch as any marked-out area of 0.2 hectares or more recognising the importance of smaller pitches used by younger age groups.

In the work we undertook with the Mayor’s sub group in 2009 to identify a network of multi-sport hub sites across the capital, it was clear that many could be characterised as being regionally significant e.g. Hackney Marshes. We believe that there is an undeniable need to maximise usage on multi-sport sites as smaller single pitch playing fields operate at a loss and often require a subsidy. Furthermore, the recognition that ancillary facility requirements on the site, e.g. car parks, storage sheds, changing pavilions etc. form part of the physical make-up of the site should be acknowledged and agreed, as without the availability of appropriate facilities to support playing fields, use would be restricted and sports development opportunities minimised.

Playing Fields are therefore important within Regional Parks; Metropolitan Parks; District Parks and Local Parks and this needs to be highlighted in the Public Open Space categorisation.

Policy S5

We recommend the inclusion of playing fields in the text of Policy S5

<p>Policy S5 Sports and recreation facilities</p> <p>A To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:</p> <ol style="list-style-type: none">1) regularly assess the need for sports and recreation facilities including playing fields at the local and sub-regional level2) secure sites for a range of sports and recreation facilities3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities. <p>B Development proposals for sports and recreation facilities including playing fields should:</p> <ol style="list-style-type: none">1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities3) support the provision of sports lighting within reasonable hours where there is an identified need for sports facilities and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity4) ensure that there is no net loss of facilities, including playing fields, unless it can be demonstrated that there is no ongoing or future demand. <p>C Where facilities are proposed on existing open space, boroughs should consider these considering policies on protecting open space (Policy G3 Metropolitan Open Land) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.</p>
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Facilities providing places to play, **particularly playing fields** lie at the heart of sustained participation along with the need to invest in their improvement and effective management. Longer term protection is required to address a historic lack of political recognition of the wider health and social benefits of well managed playing fields.

Balance between the need for more housing and playing field provision.

For this to happen there needs to be a clear understanding of housing requirements in an area and crucially reference should also be made about the provision of sport, recreation and play facilities to service the people who will live in the new housing stock. The creation of new green spaces or playing fields may in some urban environments not be possible, but where appropriate this should be a consideration when planning new housing developments.

LPFF strongly advocates that the protection and improvement of playing fields is vital and that attention needs to be drawn to the replacement of like for like or improved

facilities if they are lost to development. The situation in London is compounded by the need to find space to build 649,350 new homes over the period 2019-2029.

The Mayor’s priority is to tackle the housing crisis but through the draft London Plan he also has a responsibility to manage the tension between protecting London’s playing fields and increasing development.

It is not only the supply of playing pitches in London that is an important consideration but access to facilities. Reference to better public health, social cohesion and more responsible social attitudes brought about by the sporting experience is required along with a recognition that playing fields deliver multiple outcomes.

We are also surprised that there is no reference to the **Olympic legacy from 2012** which had the stated intention of inspiring a generation to take up sport and be more physically active. For this to happen there need to be places to deliver the variety of sport and physical activity programmes that will result in multiple outcomes such as social cohesion, crime reduction and healthier, happier local communities.

The current trend of promoting Active Travel through walking and cycling initiatives should be encouraged. In addition, making better use of playing fields and open spaces is a low cost-effective option.

Public access to major pitch sports grass pitches in London

Type	Private	Public Access	Not Known	Total
Cricket	138	546	0	685
Full sized Football	287	1669	1	1957
Hockey	23	16	0	39
Junior Football	324	723	1	1048
Junior Rugby Union	37	62	0	99
Mini Rugby	1	23	0	24
Mini Soccer	132	486	0	618
Nine v Nine	3	33	0	36
Senior Rugby Union	124	379	0	503
Total	1069	3937	2	5008

Better access to playing fields on school sites

The rationalisation of playing pitches and the distribution of sport and recreation facilities should also take account of facilities on school sites that are often unavailable for community use. One of the recommendation from the 2006 Offside Report was to provide better access to school facilities and this remains pertinent today.

In fact, the situation is exacerbated by local authority planning for the development of school sites to accommodate a rising school population. Safeguards will need to be employed to ensure that whilst schools are a community resource and may be open



to the wider community outside the normal school day, building on school playing field that result in a loss of playing pitches is unacceptable.

Within section B4 there is also a lack of clarity in referencing sport and recreation facilities. Playing Fields are not specifically mentioned and this needs to be rectified. We would suggest including along with the mantra of **NO NET LOSS OF PITCHES**.

Para 5.5.1. Add the following

Sport and recreation facilities are important components of social infrastructure. Both formal and informal facilities should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require different types of facility. Many activities require minimal facilities, and often an open space, **playing field or community hall** can be sufficient, **especially in inner London boroughs**.

Two fundamental questions remain:

How can we increase opportunities for sport, play and informal recreation if we do not protect and provide places where this activity happens?

How does the draft London Plan take into consideration the relative shortage of playing fields in London and their uneven distribution?

KPI Environment/Health

We are particularly concerned at the lack of KPI’s relating directly to the protection of playing fields. The stated KPI Environment only refers to Green Belt and MOL and fails to recognise playing fields and green spaces outside these designations. The measure is weak and again only highlights referred applications.

Environment	
KPI	Protection of Green Belt and Metropolitan Open Land including playing fields
Measure	Harm to the Green Belt and Metropolitan Open land prevented through the referred application process. <ul style="list-style-type: none"> • Monitor the loss of playing pitches following the publication of a pan London Audit
Health	
KPI	Londoners engaged in active travel Londoners engaged in sport and physical activity
Measure	Positive trend in provision of cycling parking (based on a rolling average) to support the target of all Londoners doing two ten-minute periods of active travel a day by 2041 <ul style="list-style-type: none"> • Increase the percentage of the London population taking part in sport and physical activity at least twice a month • Decrease in the percentage of people in London who are physically inactive • Increase in the percentage of adults in London using outdoor space for exercise/health reasons



Protection of the Green Belt and MOL is agreed but without knowing what constitutes a deficiency it is hard to protect. GIGL is unclear on Playing Field definitions. Therefore we need a new Pan London Audit to update the 2006 Offside Report and use this as a definitive baseline statement.

Using the Town and Country Planning (Development Procedure) England Order 2015, it is important to define a playing field as “the whole of a site which encompasses at least one playing pitch”. The order delineates a playing pitch as any marked-out area of 0.2 hectares or more recognising the importance of smaller pitches used by younger age groups. We would advocate the general presumption against the development, disposal or change of use of playing fields.

As a principle, there should be **no net loss of pitches** and no reduction in the amount of pitches available for use either for sport or informal recreation. A lack of use of a playing field should not necessarily be viewed as an indication of absence of need in the local area.

Without the availability of accessible, affordable and attractive facilities there is little prospect of widening, increasing and sustaining participation in sport and physical activity both at an informal and formal level.

As outlined in Para 5.5.1 ... formal and informal facilities should be provided to encourage physical activity and deliver a range of social health and well-being benefits to communities.

The Health KPI only refers to active travel and fails to recognise the contribution of sport and physical activity. We would recommend using Sport England KPI's as outlined in red.

The draft London Plan needs to recognise and evidence the pivotal role that playing fields (and the activities they generate) have in improving health and well-being, enhancing community cohesion and reducing crime and anti-social behaviour.

London is the greenest city of its size in the world with some 173-sq. km of green space that needs to be protected. Despite this, half of London's households are too far away from the nearest green space – more than the maximum recommended distance of 400m as outlined in the London Plan.

Conclusions

Throughout this response LPFF has recognised the need to balance the tension between development and protection, but would urge the strengthening of policies for greater protection of playing fields in London. They are a finite resource and irreplaceable. In summary we would recommend the following:

- GLA commissioning a regularly updated pan London Playing Field Audit as recommended in the 2006 Offside Report.
- Establishing an early warning system on the potential loss of playing fields by creating and updating a Fields at Risk Register.



- GLA creating a single city-wide data hub for playing fields information in collaboration with the GIGL
- Inviting LPFF to sit on the London Green Spaces Commission (as recommended in the Environment Strategy) once it is established.
- Encouraging London Boroughs to adopt the LPFF Charter for Playing Fields in London.
- Including playing fields in the Public Open Space categorisation in Table 8.1
- Supporting London Boroughs on the production of Supplementary Planning Guidance on Green Infrastructure Strategies.

Yours sincerely

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