**Analysis of the draft London Plan from a sport, recreation and playing fields perspective**

(A view from Simon Parkinson, Chair of Enfield Sport)

The London Plan is absolutely crucial in shaping the development of sport and recreation in London, at a strategic and local level, in the next 20 years. It is therefore pleasing to see a number of very positive references to sport, recreation and playing fields in the Plan (see Annex 1 to this document). Whilst those references are to be welcomed there are a number of significant issues that the Plan has not addressed, or fails to adequately deal with:

1. The Plan's Planning Policies do not protect open space or playing fields from development, unless the land is in an area of deficiency, or it is designated as Green Belt or MOL. This is a major weakness in the Plan given the major threats to open space and playing fields (demand for housing, demand for new schools, pressure to "commercialise" such spaces to generate new income streams, Councils wishing to reduce revenue costs and realise the value of assets etc.). The Planning Policies in the Plan need to be strengthened as it will be these policies (not the text around them) that will shape Local Plans and Planning decisions;

2. The Plan does not recognise the strategically important role that outer London Boroughs, such as Enfield, play in meeting demand for sports pitches by people living in inner London boroughs (where there is a deficiency of such pitches). The Plan should not only recognise this issue, but also propose funding solutions so that outer London boroughs can justify spend on sports pitches that are being used to provide sporting opportunities for people living beyond the borough's boundaries;

3. The Plan fails to mention the impact of Council budget reductions on the development of sport at local level, which means wider social objectives relating to health, education and social cohesion are less likely to be met. Enfield, along with many other boroughs in London, has seen a reduction in funding for sports development teams and increased pressure to generate income through sports programmes and the management of leisure centres, which has resulted in sport being increasingly offered on a "commercial" basis (ie as a minimum subsidies being removed and many cases "profit" being the aim). This has an obvious knock-on effect on disadvantaged communities where investment in sport (to achieve the wider social objectives referred to above) is most needed;

4. The Plan fails to focus on the important role that Sport can play in the development of London in the next 20 years. The importance of sport is recognised at a local / community level but there is no focus on the importance of the sports sector in driving economic development (new business opportunities, employment, spend in the London economy linked to sport etc); there is very little reference to the role that sport and physical activity can play in improving health and well-being (and helping to address the obesity crisis) and there is no mention about the role that sport can play in terms of community cohesion and helping to address crime and community safety issues;

5. The Plan fails to focus on strategically important sports issues in London: there is virtually no reference to the Olympics or the Olympic legacy (only the Olympic Park); there is no mention of the strategically important sports facilities that London needs (eg 50 metre swimming pools); there is no reference to the role that international sports events can play in raising London's profile and boosting the London economy ( there are no references to the planned international events or whether the Mayor will be encouraging bids for new events) and there is no mention of strategically important cross boundary issues such as the provision of playing fields (eg the important role that outer London boroughs play in meeting demand from inner London boroughs). Finally, there is not a single mention of London Sport, even though that body has a lead role in the development of sport in London;

6. The Plan is not clear on whether the references to "sport and recreation facilities" includes playing fields and outdoor sports provision. This is crucial as the Policies in the Plan provide strong protection to "sport and recreation" facilities and if the definition does include playing fields and outdoor sports provision then it could be argued that the Plan provides stronger protection than it might first appear. The problem is the way the Plan is structured and written suggests that playing fields and outdoor sports provision are not included within the definition. This is an important issue that needs clarifying.

Overall the Plan misses an opportunity to properly focus on the role the Sport can play in the development of boroughs such as Enfield and London as a whole, in the next 20 years. There are, however, a number of positive references that could be "built on", to ensure that the Plan does properly focus on this role. The Plan is also weak in terms of protecting playing fields and most open space: a failing that needs to be addressed in the final version of the document, following consultation.

Annex 1

Analysis of references to sport, recreation and playing fields

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|  | Reference | Comments |
| 1 | There are numerous references in the Plan to encouraging walking and cycling, which form a key ingredient in achieving the Mayor's target to ensure 80% of all journeys are made by walking, cycling or using public transport by 2041 . | The references to walking and cycling are positive in terms of promoting physical activity, but the Plan as a whole is really focusing on this issue in the context of Transport policies. There are no other references to any specific sport and recreation activities in the plan (other than sports ruled out of the benefits of a policy described later in the document). |
| 2 | In 5.1.1, page 202, the definition of "social infrastructure" includes reference to recreation and sport. | This is the first reference to "sport" in the Plan and appears on page 202. |
| 3 | 5.1.4 , page 203 includes: "Boroughs should consider approving the designation of a facility as an "Asset of Community Value" (ACV) if put forward by the local community. | Although the process isn't clear, this does seem to provide an opportunity for the voluntary sports sector to encourage Councils to designate sites / facilities as "ACV"s, which will presumably give them more protection. Section 7.5.5 also refers. |
| 4 | Policy 5.3: Education and Childcare Facilities, point 10, refers to ensuring "that there is not a net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand." | This is a positive reference, although not necessarily applicable to other facilities that cannot be defined as being "Education or Childcare Facilities". This is one of several references to "ongoing and future demand" in the Plan, which is positive as it recognises an assessment of the future, as well as current demand is required. |
| 5 | Policy S5: "Sport and Recreation Facilities" requires local authorities to assess need and ensure sufficient supply of facilities, as well as plan strategically to provide new facilities and to produce up to date playing pitch strategies.  Section A of Policy S5 states: " In order to ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should: 1) regularly assess the need for sports and recreation facilities at the local and sub-regional level 2) secure sites for a range of sports and recreation facilities 3) maintain and promote the Walk London Network shown on Figure 5.1 and encourage networks for walking, cycling and other activities.  Section B of Policy S5 states "Development proposals for sports and recreation facilities should: 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges and other community facilities 3) 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 biodiversity 4) ensure that there is no net loss of facilities, unless it can be demonstrated that there is no ongoing or future demand. | Ensuring a continued focus on playing pitch strategies is a positive.  Point 4) is crucial, particularly as it refers to "future demand" as well as "ongoing" demand; but does it relate to outdoor sport facilities and playing pitches, as well as indoor sports facilities? The fact that outdoor sport seems to be considered in other policies linked to green infrastructure and open space, suggests not. |
| 6 | In 5.5.1 it states: "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 a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient".. | A positive reference. Issue (as above) with regard to what "sport and recreation facilities" means. |
| 7 | In 5.5.2 it states "Current provision of swimming pools, artificial grass pitches (AGPs), and sports halls is not meeting demand. The need is most significant for AGPs where only 55 per cent of demand is currently being met. Swimming pools currently meet 93 per cent of total demand across London and sports halls meet 85 per cent of demand. For all types of facilities, the level of unmet demand is projected to increase by 2041 if no new facilities are provided. Increasing the catchment areas of existing facilities by improving public transport accessibility and access by walking and cycling, plus extending their opening hours, could increase their availability and potential number of users. Where new facilities are to be provided, they should be located in accessible locations, with the ability to maximise opening hours." | A positive reference, but only facilities of local / community benefit are being referred to. There is no reference to facilities of strategic / sub regional / regional importance (eg 50 metre pools); or to the gaps in provision for certain sports. |
| 8 | In 5.5.3 it states: "It is essential that boroughs plan strategically for future provision of these core sports facilities. Boroughs should assess the need for sport and recreation facilities to ensure appropriate levels of provision and help tackle inequality of access in London, particularly in areas or for groups with low participation. By their nature, sports facilities often form a part of open space, so sports and open space needs assessments should have regard to one another. Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open sp | A positive reference. |
| 9 | In 5.5.4 it states: "Up-to-date playing pitch strategies can be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. Sport England provides guidance on the preparation of these strategies, which underscores the importance of a strategic approach to provision to take account of demand for facilities crossing borough boundaries, particularly in relation to specialist activities. 5.5.5 states that "Specialist sporting venues and stadiums also have a role to play." | Very positive references, but there isn't a specific reference to protecting playing pitches here, or anywhere else in the Plan. The reference to a "strategic approach" to provision seems to mean a strategic approach within borough boundaries and although of adjoining boroughs working together on cross boundary issues is covered elsewhere in the Plan; there is no reference to the strategic provision of key sports facilities (indoor and outdoor) across London. |
| 10 | Section 5.5.4 refers to "the importance of a strategic approach to provision to take account of demand for facilities crossing borough boundaries, particularly in relation to specialist facilities." | Although positive this seems to relate only to facilities (ie buildings) rather than playing pitches. However, the argument can be made that this approach should be extended to playing fields. There are lots of comparable references to cross borough working in the Plan (eg 6.11.4 covering employment and training), so why cannot this be extended to playing pitches and outdoor sport? |
| 11 | Policy G1: "Green Infrastructure" , point B states that boroughs "should prepare green infrastructure strategies that integrate objectives relating to open space provision......sport and recreation..." | A positive reference. |
| 12 | Policy G2: "Green Belt" makes it clear that the Green Belt should be protected from inappropriate development and, crucially, point B states the Mayor will not allow de- designation of the Green Belt. | This is very positive for outdoor sports facilities and playing pitches located in the Green Belt. Not allowing de-designation will have a significant impact on Local Plans as local authorities will no longer be de-designate Green Belt or allow "land swops" to move land in and out of the Green Belt. The strong protection for the Green Belt (and also MOL, but see below) ironically means that green space and playing fields not designated as such will almost certainly be under more pressure (although areas of open space deficiency are protected in Policy G4). So, outer London boroughs with large areas of open space / playing fields (and a surplus of the same) will be tempted (even encouraged) to release some of that land for development. |
| 13 | Policy G3: "Metropolitan Open Land", point C allows for some alteration to MOL boundaries, so the level of protection is not as tight as Green Belt. | Positive protection is there for outdoor sports facilities and playing pitches located on MOL, although there are risks associated with boundary changes. Comments above apply. |
| 14 | Table 8.1 contains a reference to "playing fields" in the established description of "District Parks". | One of the main weaknesses in the Plan is it considers playing fields, as well as sports and recreation facilities only in the context of local / community provision. |
| 15 | Policy SI16 "Waterways – use and enjoyment" states: " B Development proposals that increase the provision of water sport centres and associated new infrastructure will be supported if a deficit in provision has been identified locally and if the infrastructure does not negatively impact on navigation. | A positive policy reference. |
| 16 | In Chapter 12 : "Monitoring" one of the KPIs relates to the "Protection of Green Belt and MOL" and there is reference to no net loss of other areas for indoor and outdoor sports and recreation in the notes under the list of KPIs (the note refers to a KPI relating to no loss of cultural venues and facilities). | The KPI covering Gren Belt and MOL confirms that the Mayor is serious about protecting land with these designations.  Although "tucked away" the reference to no net loss of indoor and outdoor sports and recreation facilities is very positive...but does it include playing fields?. |
| 17 | In 12.1.13 there is reference to more detailed data and PIs being developed which will include reference to the "provision of sports facilities". | Although positive it is not clear if this will include outdoor sports facilities (including playing pitches) as well as indoor facilities. |