





INTRODUCTION

This document has been prepared to respond to Sport England's pre-application advice to the development proposals at the Former ICL Private Grounds.

Content

- 1. Quantum and Teddington Community Sports Ground CIC's response to Sport England pre-application response. Sport England's comments are set out in *RED* with Quantum's response adjacent. Sport England's pre-application response is set out in full in Appendix 1.
- 2. Quantum and Teddington Community Sports Ground CIC's consideration of Exception Policy 4.
- 3. Quantum and Teddington Community Sports Ground CIC's consideration of Exception Policy 5.
- 4. Conclusion.





1. RESPONSE TO PRE-APP ADVICE EMAIL 14/02/2018

"Sport England has reviewed the proposals in the context of our own Playing Fields Policy (as set out above). The proposal will result in a significant amount of playing field land on the site being replaced with open space that will not be made available for pitch sports and also to accommodate the care home and GP surgery."

It is a fact that a portion of the site is being handed over to Public Open Space, Care Home and GP Surgery. However, access to sport and the amount of sport being played will increase significantly.

Putting aside the reality that this is private land and any sport played is at the discretion and subsidy of the landowner, the current pitch layout accommodates the following: 1 x full-size football pitch, 1 x youth 11x11 football pitch , 1 x 9x9 football pitch, 1 x full-size rugby pitch, 1 x natural turf cricket squares, Tarmacadam multi-use games area (MUGA) (3 x tennis courts). These are shown on drawing 900-P705- Existing Pitch Provision in Appendix 2.

Winter Usage

Realistic optimum winter usage per week for this equals:

1 x full-size football pitch - 7 hours junior or 5/6 adult.

1 x youth 11x11 football pitch – 7 hours

1 x 9x9 football pitch – 7 hours

1 x full-size rugby pitch - 7 hours junior or 5/6 adult.

Tarmacadam multi-use games area (MUGA) (3 x tennis courts or 2 x netball courts) - 40 hours

Optimum existing use: 68 hours

In comparison, the proposed enhanced facilities will provide :

1 x floodlit AGP - 80

1 x floodlit MUGA - 80

1 x full size turf pitch - 7 hours

Optimum proposed use: 167 hours

Summer Usage

1 x Cricket Square - 2.5 adult matches a week - 18 hours

(Please note that there has only been 1 official wicket on the site in summer periods. This is confirmed in the Richmond playing Pitch Strategy)

Tarmacadam multi-use games area (MUGA) (3 x tennis courts or 2 x netball courts). 60 hours

Optimum existing use: 78 hours

In comparison, the proposals will provide 167 hours.

Throughout the year, therefore, well over double the amount of sport will be played on the site. This increase in usage will occur in an environment of improved management (by the CIC) and allow greatly increased access to sport for schools, clubs, and all generations within the community.

We are aware of an alternative proposal for the site which claims 9 turf pitches can fit on the site. To claim that 9 qualifying pitches can actually fit on the site is dubious to say the least (see scaled drawings) but if it were to be believed then winter usage could deliver a maximum usage of **63** hours per week. This is be compared with the proposals which will deliver **167** hours.

It is pertinent to add that the backers of the alternative scheme do not own the 12.74 acres site, they have no agreement in place with the current land owners to obtain any of the land and they have no working relationship with the current land owners.



"It is noted that the existing playing field is currently able to accommodate 2 cricket pitches and both of these will be lost if the proposed scheme goes ahead"

Cricket					
Actual spare	Demand (pitches)				
capacity (pitches)	Overplay	Latent demand	Future demand	Total	
2	-	1	-	-1	

 Spare capacity on cricket pitches should be retained to accommodate demand (expressed as latent demand) in Hampton & Teddington Analysis Area as well as aggregated forms of future demand (equivalent to one pitch) across LBRuT.

- Bushy Park Girls CC nomadic club with no secured home venue.
- Clubs such as Hampton Wick Royal CC, Teddington Town CC and Twickenham CC highlight desire for better net training facilities.

Scenario - Exclusion of Imperial College:

Scenario does not include the pitch located at Imperial College (one pitch) to reflect any uncertainty over availability and genuine spare capacity.

Actual spare	Demand (pitches)				
capacity (pitches)	Overplay	Latent demand	Future demand	Total	
1	-	1	-	-	

 Scenario highlights need for spare capacity on cricket pitches to be retained to accommodate demand (expressed as latent demand) in Hampton & Teddington Analysis Area as well as aggregated forms of future demand (equivalent to one pitch) across LBRuT.

Fig 1.1

Background

Historically the site has had catered for 1 adult cricket square and adhoc provision for 1 junior cricket square. The Playing Pitch Strategy identifies only one cricket square as does the Sport England Active Places Power Map.

Richmond Cricket Club were the primary users of the square but have moved elsewhere. Similarly, Newland House school moved elsewhere based on prohibitive cost of using the fields in their current state.

Whilst defining the brief for the new proposals through consultation, the Teddington Community Sports Ground CIC received little interest in continued cricket use on the site, empirical evidence for lack of demand for cricket on the site.

Subsequent to the planning application being submitted, the CIC and landowner propose to include 2 x fixed cricket nets. These are shown in Appendix 3 adjacent to the turf pitch and riding arena. These drawings will form an addendum to the application to be submitted in the next few weeks.

Analysis of Playing Pitch Strategy - Cricket

Figure 1.1 shows the relevant extract from the Playing Pitch Strategy for cricket.

In summary, there is spare capacity across the analysis area for 2 pitches. If latent demand is factored in then there is spare capacity for 1 pitch.

Recognising that the site at Imperial College cannot be defined as a permanent sports pitch, the analysis considers the situation without this pitch. It demonstrates that currently there is still spare capacity for one pitch. If latent demand is considered then capacity meets demand. The removal of cricket will, therefore, not create a situation where cricket is in demand so long as spare capacity is maintained elsewhere in the analysis zone.

This view is confirmed later on the Playing Pitch strategy where it identifies spare capacity for cricket on the site.

26	Imperial College (Teddington Sports	Cricket	University	Used predominantly by Richmond CC. Spare capacity identified.
	Ground)	Football		Spare capacity identified in peak time on two adult pitches.
		Rugby		No club use identified.

And further backed up in the Cricket 'Summary' on page 50 of the Playing Pitch Strategy Assessment that states:

"There is actual spare capacity equating to four squares for grass wicket sites during peak time"

Combined with empirical evidence that cricket is not needed on the site this demonstrates the loss of a cricket square does not adversely effect the provision of cricket in the area, the need for which is still met.



"There is understood to be a need for grass pitches in the current Playing Pitch Strategy and Sport England wishes to see these playing fields bought back into use." Analysis of the PPS demonstrates that if there is a reduction in the number of turf pitches this does not adversely effect spare capacity, or indeed create demand, in the analysis area.

Football - Fig 1.2

Analysis shows there is spare capacity across all pitch types except youth pitches . When Imperial College is removed there is still spare capacity across all pitch types except youth pitches, the need for which remains the same and is not altered by the removal of Imperial College.

If the proposed 3G pitch is included then the match equivalent sessions would increase back up to above the current area summary , overplay would reduce, and youth pitch overplay would reduce significantly. (In line with the FA's desire to move junior football onto artificial surfaces)

In conclusion, there is no need to retain the surplus provision of turf Football pitches on the site.

Rugby - Fig 1.3

With the loss of 2 rugby pitch on the site and the reintroduction of 1 new (inter) national sized turf pitch, actual spare capacity would be at 4 match equivilant sessions. Current demand would therefore sit at -0.25 and accumulative future demand at 1.75.

This future demand is mitigated with the provision of the floodlit artifical surface which will provide training facilities and junior match play. All weather training facilities are a key strategic need in the PPS. The importance of this pitch type over turf is backed by statements from Teddington Rugby Club (a future user), other local clubs and governing bodies.

(It is worth noting that there is actually only one Rugby pitch on the site at the moment.

Football

Summary of pitches required to meet current and future demand

Pitch type	Actual spare	Demand (match equivalent sessions)				
	capacity	Overplay	Latent demand	Current total	Future demand	Total
Adult pitches	18	3.5	0.5	-14	-	-14
Youth pitches 11v11	-	1	-	+1	6	+7
Youth pitches 9v9	4	-	-	-4	3	-1
Mini pitches 7v7	16	-	-	-16	0.5	-15.5
Mini pitches 5v5	5	-	-	-5	0.5	-4.5

- Current and future demand is being met on all pitch types with the exception of youth 11v11 pitches.
- The demand is most significant for future provision of this kind due to population increase; seven match equivalents (equal to four pitches).
- There is actual spare capacity on most other forms of provision in particular adult pitches. This should be retained, as strategic reserve, in order to accommodate future demand for Youth 11v11 as well as shortfalls from across LBRuT but particularly from analysis areas such as Richmond.
- Overplay of adult provision (equivalent to two pitches) is attributed to a single site (Teddington Lock Playing Fields).
- Teddington Athletic FC and Hearts of Teddlothians FC are significant providers of teams in analysis area; both signal trend of growing membership levels.
- Consider creation of an additional 3G pitch as a way to reduce shortfalls and demand. Conversion of the existing AGP at Hampton Sports & Fitness Centre should be explored

Scenario - Exclusion of Imperial College:

Scenario does not include the pitches located at Imperial College (two adult and two mini 7v7 pitches) to reflect any uncertainty over availability and genuine spare capacity.

Pitch type	Actual spare		Demand (match equivalent sessions)				
	capacity°	Overplay	Latent/ unmet demand	Current total	Future demand	Total	
Adult pitches	15	3.5	1.0	-10.5	-	-10.5	
Youth pitches 11v11	-	1	-	+1	6	+7	
Youth pitches 9v9	4	-	-	-4	3	-1	
Mini pitches 7v7	12	-	-	-12	0.5	-11.5	
Mini pitches 5v5	5	-	-	-5	0.5	-4.5	

 Current and future demand can still be met on all pitch types with the exception of youth 11v11 pitches.

Fig 1.2, measured in match equivilant sessions

Rugby union

Actual spare	Demand (match equivale			
capacity ⁷	Overplay	Current demand	Latent demand	
6	3.25	-2.75	1	

- Spare capacity should be retained as it is able to accor expressed latent and future demand (as well as low total f
- Resolving demand for training, such as the heavy use Twickenham RFC, may also help to free some capacity meet future demand. Additional lighting is being installed.
- Overplay could be satisfied by improving pitch quality a Lock Playing Field sites.
- Potential for rugby use at Imperial College site should be as well as in order to meet any additional demand an improving quality of existing sites.

⁷ In match equivalent sessions

August 2015

Strategy: Knight Kavanagh

LONDON BOROUGH OF RICHMOND UPON TI PLAYING PITCH STRATEGY

Scenario – Exclusion of Imperial College:

Scenario does not include the pitches located at Imperial Colle uncertainty over availability and genuine spare capacity for rug

Actual spare	Demand (match equivale				
capacity	Overplay	Current demand	Latent demand		
2	3.25	1.25	1		

- Scenario highlights importance of retaining site in order demand and/or in case of difficulties in improving quality or
- There is also a need to retain spare capacity at sites w Rugby World Cup 2015.

Fig 1.3, measured in match equivilant sessions

en	t sessions)			
	Future demand	Total		
	1.5	-0.25		
fig of of at I	mmodate current overplay and figure). of the floodlit training pitch at of pitches in order to also help at Bushy Park and Teddington retained due to low total figure			
		f difficulties in		
&	Page	32		
H/	AMES			
eg) to reflect any		
gb				
gb	y. t sessions) Future) to reflect any Total		
gb	y. t sessions)) to reflect any Total 3.75		

"Sport England notes that an artificial pitch is proposed. It is recognised that there is acknowledged to be an existing need for artificial and grass pitches to support rugby and football in the Borough. Any new sports facilities on the site (including the new clubhouse) should be built in accordance with Sport England's technical guidance notes, copies of which can be found at: http://www.sportengland.org/facilities-planning/ tools-guidance/design-and-cost-guidance/ This facility will need to be floodlit" We can confirm that the pitches and clubhouse (designed by specialist sport facility architects LK2) are designed in accordance with Sport England's technical guidance notes. We can further confirm that the 3G pitch and MUGA are floodlit. Technical analysis and specification of the facilities are found in the planning application.

"Sport England may reconsider its position if the following issues are addressed:

1) Additional playing field land is provided within the site, including for example, provision for cricket on the site.

2) Plans showing the current and proposed pitch layout (to scale) are provided including drawings showing the design of the new facilities including the club house.

3) The need for the facilities provided should be justified in the context of the Council's Playing Pitch Strategy.

4) It is noted that a petanque court is proposed – is there an established need for this"

1) Additional playing field land is provided within the site, including for example, provision for cricket on the site.

Subsequent to the planning application, provision has now been made for two club sized, fixed, training nets. The management of the nets will be overseen by the CIC. Please see accompanying drawings that have been submitted to the Local Authority.

In addition, the land owner is actively seeking to make a cricket offset investment locally in an area where it is more needed.

2) Plans showing the current and proposed pitch layout (to scale) are provided including drawings showing the design of the new facilities including the club house.

Please see accompanying drawings.

The topic of changing room provision has been discussed at length. Advice from our specialist architects is as follows:

"Probably the most important part of your building is the changing rooms. The number of these will be determined by your usage plans and the number of pitches on the site. It is usually considered unnecessary to have a pair of changing rooms per pitch, so you should consider staggered kick-off times and separate bag storage areas. This will ensure value for money for you and your funding partners."

"Chatting to our team that sit of the FF/FA/SE Framework for changing rooms, clubhouses and ancillary facilities, and we are all in agreement that six changing rooms would be unnecessary, over provision and expensive. A six-changing room site is usually reserved for 2 x AGP and/or multiple grass pitch sites.

The four in the design at the moment will suitably serve the AGP and grass pitch in the first instance and prevent cross-contamination. Tennis, horse riding and other needs for the changing rooms will be minimal and nothing that cannot be managed by a robust management structure."

3) The need for the facilities provided should be justified in the context of the Council's Playing Pitch Strategy.

LBRuT Playing Pitch Strategy (May 2015)

Please refer to the Sports Facility Plan that justifies the need for the facilities in the context of national and local planning policy and Playing Pitch Strategy.

In summary

The LBRuT Playing Pitch Strategy was conducted to provide a clear strategic framework for the maintenance and improvement of existing outdoor sports pitches and ancillary facilities in Richmond between 2015-2020. The former ICL Private Ground has been identified within the study as being a site of strategic high priority to protect and enhance the site.

PPS key aims - Football

1. Seek to address current overplay and future demand at sites, including improvement of changing facilities and explore creation of new 3G AGPs.

• The proposals meet this by providing more sporting hours, improved changing

facilities and new 3G AGP's.

2. Opportunities to provide 3G AGPs to meet identified needs should be explored. FA modelling suggests a need for a total of five facilities (i.e. an additional four facilities as one already exists) with unmet demand from the FPM an equivalent to 1.2 floodlit pitches.

• Whilst we cannot provide 4 x 3G pitches we are able to reduce the demand

3. Ensure such provision is fully utilised and available for community use at peak times, including weekends. All new pitches should be FIFA tested and on FA 3G register.

• The site is currently privately owned and sport is played at the discretion and (unsustainable) subsidy of the land owner. The proposals ensure that provision is fully utilised and available to the whole community through the Community Interest Company. (To whom the freehold of the site is transferred). The management structure will promote maximum access to the community and focus on sport development.

4. Ensure that sinking funds are in place to maintain any new 3G AGPs in the long term.

• The land owner is contractually obliged to build the facilities, gift the land, and provide a significant sinking fund to ensure the long term viability of the site.

5. Partner accredited football clubs should have priority access at peak times and partner rates, where they can demonstrate growing the game and access for all players.

• Teddington Athletic Football Club and Teddington Rugby Club are key partners within the CIC. The CIC has support from a significant number of additional local sports clubs.

6. Unmet demand in LBRuT is expressed predominantly for additional training facilities by clubs. A total of 14 clubs express demand for additional training provision with nearly all citing a want to access a floodlit 3G AGP facility.

• The proposals meet this strategic goal.

7. Seek to provide a sufficient quality of changing provision at grass pitch sites where necessary.

• The proposals meet this strategic goal. (Current condition does not)

8. The FA also reports that TAFC have a waiting list of 100 players and would be interested in more pitches in the Teddington area should they become available.

• The proposals meet this strategic goal.

PPS key aims - Rugby Union

1. Work towards meeting identified current and future deficiencies and increase the quality of pitches and ancillary facilities as required.

- The proposals meet this strategic goal
- 2. Need to address overplay of training pitches at club sites.
 - The proposals meet this strategic goal

3. Ensure all clubs have access to training areas which are either dedicated floodlit grassed areas or through access of an International Rugby Board (IRB) AGP.

• The proposals meet this strategic goal

4. Across LBRuT most training takes place on dedicated floodlit training pitches or on match pitches. Thus, dedicated training areas and pitches are identified as being heavily used and subsequently over played. In addition, a few clubs cite

using areas of land elsewhere on site but off match pitches.

• The proposals resolve this concern

5. There is currently one IRB certified AGP (at Whitton Sports and Fitness Centre) in LBRuT which is suitable for play. However, it is only available for 1-2 hours per week for rugby due to funding agreements meaning it is predominantly programmed for football use.

• The proposals resolve this concern

6. Only one club (Thamesians RFC) highlights using the Whitton Sport and Fitness Centre facility on a regular basis for training. Teddington RFC, Thamesians RFC, Twickenham RFC, Richmond RFC, London Scottish RFC and London Welsh RFC all cite improved or increased midweek floodlit training facilities as key needs.

• The proposals resolve this concern and the clubs mentioned above have been consulted and will have the opportunity to use the facilities.

Hampton and Teddington Area - PPS (May 2015):

1. Explore potential creation and/or re-designation of football pitches to meet current demand expressed by clubs and future population demand particularly for youth 11v11 pitches.

• The proposals meet this strategic goal -the re-designation of pitches will more than double the amount of sport being played per week and help meet demand.

2. Consider creation of an additional 3G pitch to reduce shortfalls and demand.

• The proposals meet this strategic goal

3. Potential improvements should be explored to increase the former ICL Private Ground pitch quality.



• The proposals meet this strategic goal

4. Potential for the former ICL Private Ground to be used for rugby in the future should be retained as a reserve option.

• The proposals provide the flexibility to meet this strategic goal

PPS key aims - Tennis

1. As a minimum ensure court quality is maintained and that users can access the appropriate standard of courts to allow for play.

• New courts will be better quality, replacing older courts

2. Explore possibility of floodlighting courts provision in appropriate locations only and which comply with Development Management policies.

• Floodlighting is proposed

3. Consider option of outsourcing management of sites on long term basis in order for court improvements and investment to potentially be secured. This may also help to monitor casual usage levels.

• Full management of the site will be overseen by the CIC and partner tennis clubs.

4) It is noted that a petanque court is proposed – is there an established need for this

Empirical evidence for demand is provided by the local U3A society who have a need for courts in the area and support the proposals. (https://www.u3a.org. uk/)

Whilst not identified specifically in the playing pitch strategy, Petanque is recognised as an accessible sport for older people, contributing greatly to health and wellbeing. U3A have expressed the desire to promote the development of petanque at this location.

The courts are also for the benefit of new residents and provide the opportunity for them to get out of their homes and mix with younger, active people (and vice versa), reduce loneliness, increase fitness, health and well being. The societal advantage provides interaction between the generations – good for social infrastructure. The children's playground has been placed next to the petanque courts for just such a purpose.

2. ANALYSIS OF PROPOSALS AGAINST SPORT ENGLAND EXCEPTION POLICY 4

It is considered that the proposals sit positively against Sport England's exception policy 4.

"Where a replacement area of playing field and associated facilities can be provided which are equivalent or better than the existing area of playing field and its facilities, it may be beneficial to sport to take this opportunity"

Improved Quality

With consideration to the existing pitch conditions (recognised as poor in the PPS) and the poor quality (DDA incompliant and physically failing) clubhouse, the new proposals are a significant improvement:

- Improved capability, functionality, and flexibility to accommodate more than double the amount of matches, training sessions and other sporting activities per week
- Improved levels of competitive play
- Built to relevant standards and governing body design guidance
- Lower maintenance
- Increased revenue
- Improved ancillary facilities changing rooms, car parking, coach access, disabled access, bicycle parking, lighting

Procurement

- Construction of the facilities guaranteed at nil expense to the community or the local authority
- Freehold of 9.5 acres gifted to a Community Interest Company
- Management and Monitoring plan in place
- Steering groups formed from within the community
- Local clubs as key partners defining the brief and using the facilities
- Detailed business plan in place





- Legal obligations in place for all of the above and Grampian style condition suggested in s106 HoT's requiring operational facilities and land to be transferred to the CIC
- Acceptable transitional arrangements are in place with the current leaseholders to ensure minimal disruption and displacement of sport

Improved Accessibility and Management

- Management under community steering groups will secure improved and wider community use (in contrast to private ownership)
- Likewise, improved sports development within the community
- Physical design and layout is fully wheelchair accessible (not currently)
- Improved management processes in place that govern: rental and maintenance costs, management charges, opening hours, staffing, community access
- Business plan in place to ensure suitable revenue generating activities to support the running of the facilities

3. ANALYSIS OF PROPOSALS AGAINST SPORT ENGLAND EXCEPTION POLICY 5

It is considered that the proposals sit positively against Sport England's exception policy 5.

"The proposed development is for an indoor or outdoor facility for sport, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss, or prejudice to the use, of the area of playing field."

Benefits

- Meets local and strategic needs for Football, Rugby, youth provision, 3G pitch supply and facility enhancement,
- Loss of full cricket pitch does not create demand for cricket. Provision of new fixed nets on site maintains a training facility for cricket (the lack of which is identified as a limiting factor to sports development in the PPS)
- Fully secures sport-related benefits for the local community though legal obligation to construct facilities and transfer of land to the community. (Currently in private ownership.)
- Meets identified sports development priorities, both within the PPS and 'on the ground' needs of local clubs, enhanced by better management processes.
- Promoted and supported by local sports clubs
- Complies with relevant Sport England and national governing bodies of sport design guidance (current facilities do not)
- Improves the delivery of sport and physical education
- Improved physical accessibility coach parking, disabled accessibility, parking, cycle parking,
- Provides superior facilities for existing primary users (who have defined the brief in consultation with community steering groups)
- Multi use 3G pitch and MUGA increase the range and flexibility of sports available



4. CONCLUSION

Sport England's Exception 5 makes it clear a value judgement must take place to assess whether the benefits a proposal makes to the development of sport outweigh the detriment caused by the loss of an area of playing field.

This decision should be taken in the context of the grounds' situation in 2018:

- The grounds are private land with NO RIGHT of use by the public, it is not public space in any form. (Historically, the grounds have always been in private hands with access at the discretion of the landowner)
- Sport is played at the discretion of the landowner and subsidised by the land owner
- The clubhouse is physically failing, it is not DDA compliant and does not serve its purpose
- Previous community groups were unable to make a viable business case for all-turf pitches. The previous leaseholder (Teddington Athletic FC) was unable to make a viable case for all-turf pitches and was forced to relinquish the lease. The current leaseholders (TCSGCIC) of the site are only able to operate the grounds with subsidy from the landowner.
- The ground has suffered a familiar cycle: under use, under investment, under valued, under threat and ultimately sale.
- If this cycle is not broken, the grounds, as a sports facility, will continue to decline until such time as an alternative use is the only option.

In this context, local community sports clubs (the ground's natural user base) and the Teddington Community Sports Ground CIC consider the proposals offer something much more usable and aligned with local needs than the current arrangement. We have demonstrated that more match play, and more playing hours will take place each week. Indeed, the reduction in the total number of pitches does not have an adverse effect on capacity or need in the PPS analysis area. The harm of losing physical space, therefore, is demonstrably outweighed by the advantages of a fully funded, community owned, public sports facility with 3G pitch provision and new clubhouse.

In line with the three main objectives of the Playing Pitch Strategy this will, a) secure the future of the pitches and ancillary facilities in perpetuity, b) enhance existing provision by improving its quality, accessibility and management and, c) provide new playing pitches and facilities that are fit for purpose and meet demands for participation now and in the future.

In terms of assessing Exception 4 and 5, it is the responsibility of Sport England to assess the merits of this proposal against the existing situation. It is improper to be prejudiced by any alternative proposal, the deliverability and viability of which is wholly unreliable and not supported by the end users.

To rebalance the loss of cricket on the site, the applicants propose to introduce fixed cricket nets for school, club and community use. This is in addition to actively seeking an off site cricket contribution to be used where there is greater demand for cricket.

APPENDIX 1: SPORT ENGLAND PRE-APP RESPONSE

Sam Hobson

Vicky Aston <vicky.aston@sportengland.org></vicky.aston@sportengland.org>
14 February 2018 15:13
Sam Hobson
Teddington Sports Ground, Udney Park Road - Sport England Ref:
L/RT/2018/47988/P

Dear Sam.

Thank you for consulting Sport England on the above proposal. I note that the planning application for this site has yet to be registered so the comments below are based upon the information you have provided me with. I have not yet received comments in from the pitch sport National Governing Bodies but I would anticipate these will come in and further inform our response, once the planning application is registered.

Sport England –Statutory Role and Policy

The site is considered to constitute playing field, or land last used as playing field, therefore Sport England advises that this proposal would require statutory consultation, under the terms of the Town and Country Planning (Development Management Procedure) (England) Order 2015, at the formal planning application stage.

Sport England considers proposals affecting playing fields in the light of the National Planning Policy Framework (NPPF) (in particular Para. 74), and its Playing Fields Policy: 'A Sporting Future for the Playing Fields of England', which can be accessed via the following link: www.sportengland.org/playingfieldspolicy

Sport England's policy is to oppose the granting of planning permission for any development which would lead to the loss of, or prejudice the use of, all or any part of a playing field, unless one or more of the five exceptions stated in its policy apply:

	Sport England Policy
	Summary of Exceptions
E1	An assessment has demonstrated that there is an excess of playing fields in the catchment and the site has no special significance for sport
E2	The development is ancillary to the principal use of the playing field and does not affect the quantity/quality of pitches
E3	The development only affects land incapable of forming part of a playing pitch and would lead to no loss of ability to use/size of playing pitch
E4	Playing field lost would be replaced, equivalent or better in terms of quantity, quality and accessibility
E5	The proposed development is for an indoor/outdoor sports facility of sufficient benefit to sport to outweigh the detriment caused by the loss of playing field

Assessment against Sport England Policy

It is proposed to build on existing playing field land at Teddington Sports Ground. The site was previously the Imperial College sports ground. The proposals will result in the loss of part of the playing field to a care home development, a gp's surgery and area of public open space. The proposals include the provision of a new sports club building on the site, grass pitch, artificial grass pitch, MUGA and petangue courts. It is noted that this is a private site and that the owner continues to allow some sports use of the site.

It is further noted that the draft Richmond Local Plan identifies the playing field as Local Green Space. According to the draft Local Plan this means that the site should be protected from inappropriate

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development (as for Green Belt policy). The proposals for the care home and gp's surgery would not sit easily against this policy.

Sport England has reviewed the proposals in the context of our own Playing Fields Policy (as set out above). The proposal will result in a significant amount of playing field land on the site being replaced with open space that will not be made available for pitch sports and also to accommodate the care home and gp surgery. It is noted that the existing playing field is currently able to accommodate 2 cricket pitches and both of these will be lost if the proposed scheme goes ahead. There is understood to be a need for grass pitches in the current Playing Pitch Strategy and Sport England wishes to see these playing fields bought back into use.

Sport England notes that an artificial pitch is proposed. It is recognised that there is acknowledged to be an existing need for artificial and grass pitches to support rugby and football in the Borough. Any new sports facilities on the site (including the new clubhouse) should be built in accordance with Sport England's technical guidance notes, copies of which can be found at: http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ This facility will need to be floodlit.

Sport England's design guidance for artificial surfaces is contained in the document 'Artificial Surfaces for Outdoor Sports'. There is also guidance available on floodlighting and Artificial Grass Pitch (Acoustics -Planning Implications) here:

https://www.sportengland.org/facilities-planning/design-and-cost-guidance/artificial-sports-surfaces/

The current proposal is not considered to adequately meet any of the above exceptions, due to the significant loss of playing field proposed, therefore Sport England is likely to object to any planning application as currently set out.

Sport England may reconsider its position if the following issues are addressed: Additional playing field land is provided within the site, including for example, provision for cricket on

- the site
- · Plans showing the current and proposed pitch layout (to scale) are provided including drawings showing the design of the new facilities including the club house.
- The need for the facilities provided should be justified in the context of the Council's Playing Pitch Strategy. It is noted that a petanque court is proposed – is there an established need for this facility?
- · Sport England will further consult the National Governing Bodies to understand their views on the proposals.

Sport England reserves the right to object to any subsequent planning application if we do not consider that it accords with our playing fields policy or para 74 of NPPF.

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If you require any further information please do not hesitate to contact the undersigned.

Yours sincerely,

Vicky Aston Planning Manager

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QUANTUM GROU



APPENDIX 2: 900-P705-PREVIOUS PLAYING PITCH PROVISION



TEDDINGTON COMMUNITY SPORTS GROUND CIC

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APPENDIX 3: PROPOSED SITE PLAN WITH CRICKET NETS





