

Garside, James

From: Environmental Protection
Sent: 08 October 2018 16:42
To: Vicky Aston
Cc: Chris Whitaker; Christopher.Donkin@LTA.org.uk; Duncan Jenkinson; Jay Bowers ([REDACTED] Stuart Lamb'); Bob Sharples; Garside, James
Subject: RE: App Ref: 18/2977/FUL - Marble Hill Park, Richmond Road, TW1 2NL - Sport England Ref: PA/18/L/RT/50153

Dear Vicky Aston,

Thank you for your email which I have forwarded to James Garside who will respond accordingly.

Dan Nugent
Contact Analyst
Corporate Customer Services
Serving Richmond and Wandsworth Councils
Tel: 0208 891 1411
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Subject: App Ref: 18/2977/FUL - Marble Hill Park, Richmond Road, TW1 2NL - Sport England Ref: PA/18/L/RT/50153

FAO: James Garside

Dear James

Thank you for consulting Sport England on the above application.

<p>Summary: Sport England objects to this planning application as the proposed changes to the changing rooms do not meet current user requirements. Sport England will remove this objection if this issue is addressed. Sport England welcomes the proposed improvements to the sports pitches at this site.</p>
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Sport England - Statutory Role and Policy

It is understood that the proposal prejudices the use, or leads to the loss of use, of land being used as a playing field or has been used as a playing field in the last five years, as defined in The Town and Country Planning (Development Management Procedure) (England) Order 2015 (Statutory Instrument 2015 No. 595). The consultation with Sport England is therefore a statutory requirement.

Sport England has considered the application in light of the National Planning Policy Framework (NPPF) (in particular Para. 97), and against its own playing fields policy, which states:

'Sport England will oppose the granting of planning permission for any development which would lead to the loss of, or would prejudice the use of:

- all or any part of a playing field, or
- land which has been used as a playing field and remains undeveloped, or
- land allocated for use as a playing field

unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.'

Sport England's Playing Fields Policy and Guidance document can be viewed via the below link:
www.sportengland.org/playingfieldspolicy

The Proposal and Impact on Playing Field

It is proposed to make improvements to Marble Hill House, the stables block, the sports block and landscaping. Similar proposals were previously the subject of consultation with Sport England in 2017.

This site is an important site for sport in the Borough. The Borough's Playing Pitch Strategy (updated 2018) identifies Marble Hill Park as a Key Centre, which recognises the need to make financial investment in ancillary facilities. The recommendations for Marble Hill are;

- Ensure appropriate maintenance to sustain quality and seek improvements where possible.
- Explore demand of re-configuring an adult pitch to better accommodate youth 11v11 demand.
- Improve changing facilities.

Sport England has consulted the relevant National Governing Bodies on this proposal.

England & Wales Cricket Board

The ECB has advised us that the non-turf pitch has recently been replaced, and that the net bay facilities are also to be replaced. The ECB support the refurbishment of these facilities. However, the changing provision proposed in this application wouldn't meet safeguarding requirements; in particular shared showers is not acceptable.

In addition, the changing provision at Marble Hill Park is a significant distance from the cricket pitch; a sheltered changing facility located beside the cricket pitch would be an ideal option for cricket – the ECB would be able to advise on potential designs for this. The inclusion of pitch-side changing provision would support sustainable growth of cricket at the site. The shelters can be sympathetically designed and be dual purpose as in being an accessible facility for the public.

Football Foundation

The Football Foundation (commenting on behalf of the FA) supports the proposed pitch improvements, providing the following:

- Design - Natural Turf Pitches should be designed by a RIPTA registered agronomist to meet The FA Performance Quality Standard (PQS).
- Construction –The construction of Natural Turf Pitches should be project managed or signed off by the same RIPTA registered agronomist that produced the design.
- Quality – Pitches should pass a PQS test to a 'good' standard before the pitches are used. The testing should be arranged via the FA Pitch Improvement Programme.
- Maintenance - In order to keep the quality of the pitches, an appropriate maintenance programme is agreed in-line with the design agronomist recommendations

However, the proposed changing rooms do not meet FA / Football Foundation guidance and do not promote use by females / children, i.e. communal showers, no WC / shower facilities in officials changing rooms. The changing rooms should follow Football Foundation Guidance to Changing Rooms.

Surrey CFA would want plans on what clubs could access the site and appropriate CUA put in place. There is capacity on site at present, so an affordable pricing policy and CUA would encourage use.

Lawn Tennis Association (LTA)

The LTA welcomes the plans to invest in the tennis facilities to bring them up to a more usable condition. It is understood that the site used for both casual play and formalised coaching programmes.

The LTA notes that it isn't clear from the planning application how the site will operate going forwards. We have worked closely with RBC to introduce a new operational model that improves the customer journey and also allows the Council to collect money from bookings etc. Current indications is that this system is working well in that the courts are now sustainable and participation levels are increasing. The LTA advises that they consider a similar improvement could also be made at Marble Hill for site users. Given the site is located within close proximity to two park sites that have the gate access system installed, it would be good to ensure that the new operation at MH is as welcoming as this system to ensure that the courts are used to their full potential in an area where demand for tennis is very high.

Rugby Football Union (RFU)

The RFU has advised us that there are 2 clubs that play on the site; Thamesians RFC and Bulldogs RFC. The RFU wishes to support the changes that will support the playing of Rugby Union on the site including the development of both built structure and any associated pitch developments. However, they also note that the changing room improvements require further attention to meet current guidance.

Assessment against Sport England Policy/NPPF

Sport England welcomes the intention to provide pitch improvements at this site and to provide better changing facilities for site users. Sport England previously withdrew an initial holding objection to the previous application as further information was provided regarding the timetabling of the pitch improvements, to reduce the impact on displacing teams whilst the pitch drainage works were undertaken. Provided that the pitch improvements will be undertaken to minimise disruption as previously agreed, Sport England supports this element of the proposals.

However, with regard to the proposed changes to the changing facilities, Sport England is concerned that the proposed changing room improvements do not include any shower cubicles. A number of the national governing bodies have highlighted that the proposed changing room improvements do not meet their (or Sport England's) current guidance for changing rooms. It is important to have cubicles to address safeguarding issues for young people and also recognise the needs of adults with special needs and other diverse adult groups with special requirements. It is understood that this is a heritage building however this is an important issue that requires attention to meet the needs of site users at this Key Centre.

Cricket has also advised that it would be preferable to have a pavilion block closer to the playing field. Again, whilst there are heritage issues on the site Sport England and the ECB would like to discuss further with the applicant and the Council to try to address this through an innovative design solution.

Conclusion

In light of the above, Sport England objects to the application because the internal layout of the changing rooms requires further attention before Sport England is able to not object to these proposals.

It is appreciated that it is difficult to adapt historic buildings to meet modern standards but with innovative design and investment, Sport England considers that potentially this could be addressed through innovative design solutions.

Sport England would like to meet with English Heritage at the earliest opportunity to discuss the proposals for the changing rooms. Sport England is likely to withdraw its objection to this application if the issue relating to the changing provision is resolved.

We would also like further information about how the site will be operated (further to the comments made above by some of the sport National Governing Bodies). Sport England also considers that it may be appropriate to secure a community use agreement for this site (this can be secured through planning condition).

Should your Council be minded to grant planning permission for the development then in accordance with The Town and Country Planning (Consultation) (England) Direction 2009, the application should be referred to the Secretary of State, via the Planning Casework Unit.

If this application is to be presented to a Planning Committee, we would like to be notified in advance of the publication of any committee agendas, report(s) and committee date(s). We would be grateful if you would advise us of the outcome of the application by sending us a copy of the decision notice.

The absence of an objection to this application, in the context of the Town and Country Planning Act, cannot be taken as formal support or consent from Sport England or any National Governing Body of Sport to any related funding application, or as may be required by virtue of any pre-existing funding agreement.

If you would like any further information or advice please contact the undersigned at the address below.

Yours sincerely,

Vicky

Vicky Aston
Planning Manager

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National Sports Centre, near Marlow, Buckinghamshire, SL7 1RR



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [Gail Laughlan](#)

Vicky

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