

Ham Close Regeneration

Planning Application:
Playing Fields Assessment

Author: LUC
April 2022



Hill Residential

Ham Close Estate Playing Field Assessment

Project Number
11833

Version	Status	Prepared	Checked	Approved	Date
1.	DRAFT	RS	JL RS HK	RS	25.01.2022
2.	DRAFT FINAL	RS	RS	RS	16.03.2022
3.	FINAL	ST	RS	RS	11.04.2022

Bristol
Edinburgh
Glasgow
London
Manchester

landuse.co.uk

Land Use Consultants Ltd
Registered in England
Registered number 2549296
Registered office:
250 Waterloo Road
London SE1 8RD

100% recycled paper

Landscape Design
Strategic Planning & Assessment
Development Planning
Urban Design & Masterplanning
Environmental Impact Assessment
Landscape Planning & Assessment
Landscape Management
Ecology
Historic Environment
GIS & Visualisation



Contents

Chapter 1 **Introduction** **1**

Purpose of the Playing Field Assessment 1

Chapter 2 **Policy Context** **2**

Sport England 2

National Planning Policy 3

Regional Planning Policy 3

Local Planning Policy 3

Chapter 3 **Playing Field Impact** **4**

Overview 4

Legal Disposal of the Land 5

Impact on Sports Pitches 5

Chapter 4 **Policy Appraisal** **6**

Sport England 6

National, Regional & Local Planning Policy 7

Chapter 5 **Summary and Conclusion** **9**

Chapter 1

Introduction

1.1 Hill Residential has commissioned LUC to undertake a Playing Field Assessment to accompany a planning application for the proposed redevelopment of Ham Close, Ham, Richmond upon Thames, TW10 7PG. A separate Open Space Assessment has also been prepared.

1.2 Ham Close is a 4.69ha site comprising land owned by Richmond Housing Partnership and the London Borough of Richmond upon Thames (LBRuT). It is located in the suburban district of Ham in Richmond, south-west London. Ham Close is a 1960s built estate which comprises 192 homes across 14 blocks. The estate is owned and managed by Richmond Housing Partnership (RHP).

1.3 Hill Residential is proposing the following:

Demolition of existing buildings on-site and phased mixed-use development comprising 452 residential homes (Class C3) up to six storeys; a Community/Leisure Facility (Class F2) of up to 3 storeys in height, a “Maker Labs” (sui generis) of up to 2 storeys together with basement car parking and site wide landscaping.

1.4 A landscape led masterplan has been developed with a focal public open space at the centre of the development which will link through to the adjacent Ham Village Green across the development.

1.5 Ham Close is adjacent to Ham Village Green, which is designated within LBRuT's Local Plan (2018) as Other Open Land of Townscape Importance (OOLTI) and Public Open Space (POS). The application site also includes a small strip of land adjacent to the western boundary of the estate, which is designated playing field within the grounds of St Richards Church of England Primary School. For this reason, this Playing Field Assessment has been undertaken to accompany the planning application for the scheme.

Purpose of the Playing Field Assessment

1.6 The purpose of this Playing Field Assessment is to appraise the loss of playing field in the context of relevant policy, namely that of Sport England as well as any relevant local (LBRuT), regional (London Plan) and national planning policy (NPPF).

Chapter 2

Policy Context

2.1 This Chapter sets out the policy context under which this Playing Field Assessment has been undertaken.

Sport England

2.2 Sport England's Playing Fields Policy and Guidance document (March 2018, last updated December 2021) sets out Sports England's policy and guidance on planning applications which affect playing fields.

2.3 The document states the following:

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.

2.4 The five exceptions are as follows:

Exception 1:

A robust and up-to-date assessment has been demonstrated, to the satisfaction of Sport England, that there is an excess of playing field provision in the catchment, which will remain the case should the development be permitted, and the site has no special significance to the interests of sport.

Exception 2:

The proposed development is for ancillary facilities supporting the principal use of the site as a playing field, and does not affect the quantity or quality of playing pitches or otherwise affect their use.

Exception 3:

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- Reduce the size of any playing pitch;

- Result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- Reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- Result in the loss of other sporting provision or ancillary facilities on the site; or
- Prejudice the use of any remaining areas of playing field on the site.

Exception 4

The area of playing field to be lost as a result of the proposed development will be replaced, prior to the commencement of development, by a new area of playing field:

- Of equivalent or better quality, and
- Of equivalent or greater quantity, and
- In a suitable location, and
- Subject to equivalent or better accessibility and management arrangements.

Exception 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.

National Planning Policy

2.5 Paragraph 99 of the National Planning Policy Framework (NPPF) states the following:

Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Regional Planning Policy

2.6 Policy S5 of the London Plan includes the following:

C. Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

- 1) As assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or
- 2) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- 3) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

Local Planning Policy

2.7 The London Borough of Richmond upon Thames Local Plan Policy LP31 states:

A. Public Open Space, children's and young people's play facilities as well as formal and informal sports grounds and playing fields will be protected, and where possible enhanced. [...]

New open spaces, play facilities and formal and informal land for sport and recreation should be linked to the wider Green Infrastructure network as they play an important role in creating social cohesion, encouraging and promoting healthier and more active lifestyles.

Chapter 3

Playing Field Impact

Overview

3.1 The proposed Ham Close re-development scheme includes the use of 670m² of designated playing field which currently falls within the boundary of St Richards Church of England Primary School.

3.2 This area of land in question, whilst designated as playing field, effectively comprises a perimeter strip to the school's outdoor space. The northern element of the strip of land is hardstanding, whilst the southern segment is not part of the functioning playing field space. Furthermore, the school does not refer to the strip of land as playing fields; instead, it uses the area for the delivery of their science and ecology curriculum as part of it was planted with fruit trees approximately six years ago. The immediate area around the fruit trees is also left unmown rather than contributing to the playing field space.

3.3 The following images, showing an aerial view of the playing field land in question along with an existing and proposed plan overlaid with an outline of the playing field to be lost, visually demonstrate the specific context described above:



Figure 1: Aerial view of edge of playing field to be lost



Figure 2: Existing Plan of edge of playing field to be lost

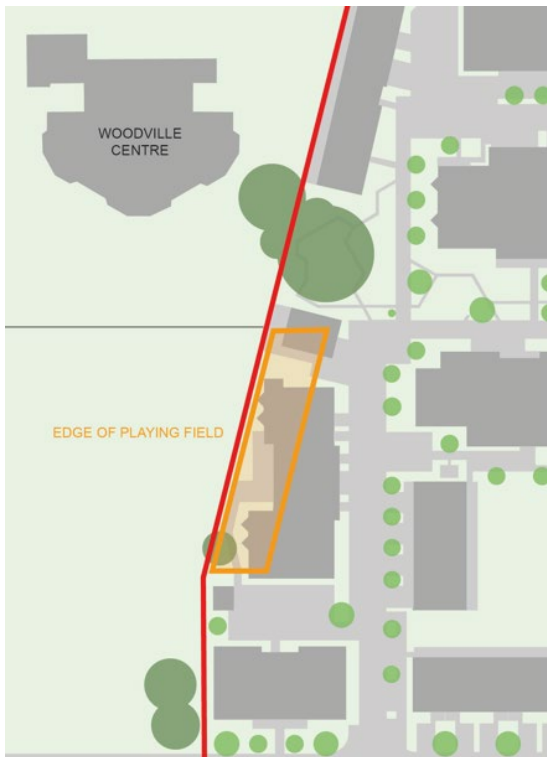


Figure 3: Proposed Plan of edge of playing field to be lost

Legal Disposal of the Land

3.4 On 18th November 2018, Richmond Council's Cabinet approved the disposal of the strip of land in question for use in the redevelopment of the Ham Close Estate. Local authorities wanting to dispose of playing field land need consent under Section 77 of the Schools Standards and Framework Act 1998. The Section 77 Approval was granted on 2nd June 2020.

Impact on Sports Pitches

3.5 As described above, the area in question comprises hardstanding and an area planted with trees and otherwise left unowned. It is not therefore part of the school's functional playing field space and is not occupied by any of the school's marked out sports pitches or their run-off areas.

3.6 Based on DfT standards the minimum need for playing fields for the primary school would be 9,686m². The current fields measure 15,377m². Therefore, even with the removal of the area in question, an area of 670m², the retained playing field area would vastly exceed the minimum recommended area.

3.7 The actual impact upon the school's existing sports pitches would therefore be negligible. Notwithstanding this, it is important that the loss of this area is assessed in the context of relevant policy, particularly that of Sport England.

Chapter 4

Policy Appraisal

Sport England

4.1 Sport England policy stipulates that they 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.

4.2 Unless, in the judgment of Sport England, the development as a whole meets with one or more of five specific exceptions (set out in full in the Policy Context chapter of this report).

4.3 In this instance, the land in question is designated as playing field, however it is not currently, nor has it ever (as far as records show), been used as functional playing field by the school in which it is situated. Nevertheless, for the purpose of Sport England policy, the scheme would result in the loss of land allocated for use as a playing field. The question therefore is whether or not any of the exceptions set out by Sport England have been met.

4.4 It is considered that the proposal meets Exception 3, which states the following:

The proposed development affects only land incapable of forming part of a playing pitch and does not:

- Reduce the size of any playing pitch;
- Result in the inability to use any playing pitch (including the maintenance of adequate safety margins and run-off areas);
- Reduce the sporting capacity of the playing field to accommodate playing pitches or the capability to rotate or reposition playing pitches to maintain their quality;
- Result in the loss of other sporting provision or ancillary facilities on the site; or
- Prejudice the use of any remaining areas of playing field on the site.

4.5 The specific points within Exception 3 are addressed as follows:

Impact on size of playing pitches

4.6 The area of land does not currently contribute to the playing pitches, either directly or as run-off. Historical aerial photography suggests that the strip of land has never been used as a playing field. Furthermore, as a strip of irregularly shaped land at the edge of the site, it is unlikely to be capable of forming part of a playing pitch.

4.7 It is therefore considered that it would not reduce the size of any playing pitch, either currently, historically, or potentially, in accordance with the requirement within Exception 3.

Impact on ability to use any playing pitch

4.8 The area of land does not currently contribute to the ability to use any of the playing pitches on the site, both due to its location and shape, and because it is planted with trees, includes hardstanding, or is unmown.

4.9 The existing pitches have sufficient space around them to provide margins and run-off areas, and there is ample room to allow for maintenance of them without needing access to the piece of land in question.

4.10 It is therefore considered that the removal of the land in question would not affect the ability to use any of the playing pitches, in accordance with the requirement within Exception 3.

Impact on the sporting capacity of the playing field to accommodate playing pitches

4.11 The area of land in question is at the side of the playing fields and is irregular in shape. It does not therefore contribute to the sporting capacity of the playing fields. The playing pitches which are used on the playing fields can therefore easily be rotated or repositioned within the remaining playing field area.

4.12 It is therefore considered that the removal of the land in question would not reduce the sporting capacity of the playing field, in accordance with the requirement within Exception 3.

Impact on other sporting provision or ancillary facilities

4.13 The area of land does not contain any ancillary sporting facilities or other sporting provision. It contains a small area of hardstanding, trees and unmown grass and is used for non-sporting activities.

4.14 It is therefore considered that it would not result in the loss of other sporting provision or ancillary facilities on the site, in accordance with the requirement within Exception 3.

Impact on the remaining areas of playing field

4.15 As an irregular strip of land and the edge of the site, largely covered with trees, it makes no contribution to the playing field by way of sports provision. Furthermore, as noted in this report, the remaining area of playing field would vastly exceed the recommended amount required for a school of this size. It is also noted that generally it is not advisable to use land too close to trees as playing field as leaf drop can present health and safety issues.

4.16 Its removal would not therefore prejudice the use of any remaining areas of playing field on this site, in accordance with the requirement within Exception 3.

Summary

4.17 As set out above, it is considered that in this instance the proposed development affects only land incapable of forming part of a playing pitch and all of the elements which make up Exception 3 are met. Exception 3 is therefore considered to apply and the removal of the land as playing field should be considered acceptable.

National, Regional & Local Planning Policy

4.18 As set out within the Policy Context chapter of this report, national (NPPF) and regional (London Plan) policy reflect one another in terms of what they deem to be acceptable in respect of development of playing fields, stipulating that an assessment should be undertaken to demonstrate that the area of land is surplus to requirements and that the loss resulting from the development should result in better provision in terms of quality and/or quantity.

4.19 Local (LBRuT) policy seeks to protect and enhance children's and young people's play facilities as well as informal and formal sports grounds and playing fields.

4.20 In this instance, the assessment in respect of Sport England policy clearly demonstrates that the land in question is of little value in the context of its playing field designation. Furthermore, in the context of school playing field provision recommendations, the retained playing field would vastly exceed the minimum recommended area for a school of this size. In that context therefore, it can be considered surplus to requirements.

4.21 Notwithstanding the above, the loss of the area, and the area of land's subsequent contribution to the redevelopment scheme for Ham Close Estate, is such that it would arguably result in better provision in terms of quality and quantity. The land is not currently publicly accessible and its inclusion within the development area would not reduce the extent of public open space or playing field space within the area. The space would effectively be re-provided within the development scheme as a publicly accessible open space within a linear

park. Therefore, a currently underused piece of land, would effectively be replaced with a new area of publicly accessible land of far greater value in the context of open space and green infrastructure in the area.

4.22 Contrary to its playing field designation, the area of land does not currently contribute to sport in any way, whereas the new open spaces within the proposed development will provide opportunities for formal and informal recreation, including a natural play area and fitness equipment. The development of the piece of playing field land in this instance would arguably therefore result in better provision in terms of both quality and quantity and will enhance the provision of young people's play facilities and formal and informal recreation and sports provision in the local area.

4.23 Given the above, it is considered that the development of the small strip of playing field land would be in accordance with national, regional and local planning policy.

Chapter 5

Summary and Conclusion

5.1 The Ham Close Estate redevelopment scheme includes the development of a small strip of designated playing field land currently within the boundary of St Richards Church of England Primary School.

5.2 The development of the area of land is considered to meet Exception 3 as set out in Sport England's Playing Fields Policy and Guidance and also comply with national, regional and local planning policy, for the following reasons:

- The land is not currently, historically or potentially usable as functional playing field.
- Its removal would not affect the use of the school playing pitches and the retained playing field space would exceed the recommended amount of playing field for a school of this size.
- It would effectively be replaced with new areas of publicly accessible open green space, including that which can be used for formal and informal recreational purposes, thereby resulting in an enhancement in quality and quantity of such provision in the area.