



Creating sporting opportunities in every community

Mr David Charteris
Planning Control
London Borough of Harrow
Civic Centre PO Box 37
Station Road
Harrow HA

**BUSINESS CONNECTIONS
SUPPORT SERVICES**

24 AUG 2009

HARROW COUNCIL

19 August 2009

Your ref: P/1546/09
Our ref: L/CRO/2009/17453/S

Dear Mr Charteris,

Town & Country Planning Act 1990 (as amended)

Location: St. George's Field, Pinner View, Harrow, HA1 4RJ

Proposal: 'Redevelopment' of site for 7x1 bed flats, 8x2 bed flats, 4x3 bed houses, 8x4bed houses, extended access road, detached double garage, altered access for St. George's Church Hall, and provision of 0.8ha of public open space

Thank you for consulting Sport England on the above planning application.

National policy on the loss of, or development impacting, playing fields is currently framed by Statutory Instrument 1817 of 2006. This definition of a playing field in this statutory instrument is further amended by S.I. 453 of 2009. In accordance with these circulars the application is assessed as a statutory consultation.

Sport England's policy on planning applications for development on playing fields and former playing fields is set out in our planning policy statement, *A Sporting Future for the Playing Fields of England*. This states that we 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 unless at least one of five specific exceptions applies. The exceptions are stated as:-

- E1 A carefully quantified and documented assessment of current and future needs has demonstrated to the satisfaction of Sport England that there is an excess of playing field provision in the catchment, and the site has no special significance to the interests of sport.
- E2 The proposed development is ancillary to the principal use of the site as a playing field or playing fields, and does not affect the quantity or quality of pitches or adversely affect their use.
- E3 The proposed development affects only land incapable of forming, or forming part of, a playing pitch, and does not result in the loss of, or inability to make use of any playing pitch (including the maintenance of adequate safety margins), a reduction in the size of the playing area of any playing pitch or the loss of any other sporting/ancillary





facility on the site.

- E4 The playing field or playing fields which would be lost as a result of the proposed development would be replaced by a playing field or playing fields of an equivalent or better quality and of equivalent or greater quantity, in a suitable location and subject to equivalent or better management arrangements, prior to the commencement of the development.
- E5 The proposed development is for an indoor or outdoor sports facility, the provision of which would be of sufficient benefit to the development of sport as to outweigh the detriment caused by the loss of the playing field.

Assessment of Application

Our position is has not changed from previous applications on this site. The current LB Harrow PPG17 Playing Pitch Strategy (2005) clearly shows that the borough should not lose any cricket fields and also demonstrates that other pitches are in deficit.

We determine that the application fails to demonstrate that any of the above listed exceptions have been met and accordingly **Sport England objects to the proposed development** for the following reasons:-

1. Sport England has evidence that verifies the sports field has been used consistently for organised cricket games and practice over a period of at least 75 years up to a period ending within the last five years. Therefore the established use of the site is as a sports field and not, as defined in the application, an open space.
2. The Council's 2005 PPG17 Assessment on playing fields demonstrates a latent demand for cricket pitches in the borough approaching 2011 and a pronounced latent demand for such pitches by 2021. Sport England considers that partial loss of the field establishes the principle of development of the site and it remains a loss to sports use for which the entire site has been used consistently.
3. The loss of the site has not been addressed by the replacement of facilities of equivalent or better standard elsewhere in the locality.
4. Sport England notes that there is latent demand in the locality for sufficient space for cricket clubs and to address growing demands for participation. Additionally, we have ascertained from local schools that the site has been used informally for outdoor sports in suitable weather.
5. The application has not account for the two clubs who used the site as a base and have been removed from the site in recent years by the landlord. The loss of a base for any club renders the application for sports awards and grants impossible further diminishing the operations of local sports provision.

We refer to PPG 17, paragraph 10;

*Existing open space, sports and recreational buildings and land should not be built on unless an assessment has been undertaken which has **clearly shown the open space or the buildings and land to be surplus to requirements**. For open space, 'surplus to*



*requirements' should include consideration of all the functions that open space can perform. Not all open space, sport and recreational land and buildings are of equal merit and some may be available for alternative uses. In the absence of a robust and up-to-date assessment by a local authority, an applicant for planning permission may seek to demonstrate through an independent assessment that the land or buildings are surplus to requirements. Developers will need to consult the local community and **demonstrate that their proposals are widely supported by them.***

Please Note: The partial development of the site is to be resisted as the design appears to allow for eventual development of the entire site for housing. In addition, the Inspector's report on the previous appeal for this development is quite wrong in stating that the current site is insufficient in size to accommodate a cricket pitch. The Inspector concerned also failed to acknowledge the playing of junior cricket requires approximately 75% of the area of an adult cricket pitch and the site comfortably supports junior cricket. Of most critical importance the Inspector also failed to acknowledge that PPG 17 states that where a playing field is considered surplus to requirements the site should be re-used for other types of pitch identified as being in deficit before any development is considered. None of this has been considered by the applicant at any stage.

The position on this site remains unchanged and we strongly resist the applicants repeated attempts to remove this playing field.

I would be grateful if you would inform me of the outcome of this application in due course by forwarding a copy of the decision notice. This is needed to update our database on planning application consultations.

Yours sincerely

A handwritten signature in black ink, appearing to read "Conal Stewart".

Conal Stewart - Planning Manager
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