

**From:** Vicky Aston <[REDACTED]>  
**Sent:** 17 March 2025 17:19  
**To:** Richmond Local Plan  
**Cc:** [REDACTED]  
**Subject:** RB Richmond - Consultation on Proposed Main Modifications to the Local Plan

**Categories:** Consultation Response

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Dear Local Plans Team,

Please find below my comments on the Local Plan modifications;

**Kneller Hall – MM16, MM17 & MM18** – Sport England objects to the amendments to the policy as a much wider review of the site allocation is required. Sport England wishes to raise concern with the Planning Inspector that the whole of this site is designated as a SINC (see comments on Annex 2.1).

The Policy states that the existing playing fields will be retained and where possible upgraded, however, this does not reflect the current proposals for the site (see current planning application) which the applicant put forward following detailed pre-application discussions. This is for a single artificial pitch with sports lighting surrounded by 'acid grassland', as we understand this approach has been recommended to the applicant by the Local Planning Authority the Local Plan should be similarly adjusted to reflect that the artificial pitch with sports lighting is what will be delivered to provide certainty to the applicant. As it is currently worded, the policy text does not appear to support this.

Sport England remains of the view that the Playing Pitch Strategy should also carry weight in the Council's consideration of the amendments to this site allocation. The Playing Pitch Strategy demonstrates that there is a need for more playing field in LB Richmond and that facilitating community use of the playing fields at Kneller Hall was expected to meet this need, providing pitches for football (adult and youth pitches), rugby and a non-turf pitch for cricket.

Sport England did not pick up through our previous review of the Preferred Options document (July 2023) that the Council had added/redesignated numerous playing field sites to Appendix 4 as new SINC. In retrospect, Sport England should have made representations particularly with regard to Kneller Hall playing fields and Udney Park playing fields but this is not surprising as these changes were contained in an appendix at the end of the Local Plan so were easy to miss. If we had picked this up we would have raised questions about whether the whole of the existing playing field at Kneller Hall could meet the designation criteria for a local wildlife site (SINC), see comments on Annex 2.1 below.

## **Annex 2.1 – Updated Appendix 4; Review of Sites of Importance for Nature Conservation**

Sport England questions the blanket designation of playing field sites that have fallen out of use due to a change in land ownership (such as Udney Park Playing Fields and Kneller Hall) but also those that are in use Barnes Playing Field etc. within the Local Plan as SINC. Sport England is concerned that any playing fields identified as SINC will no longer be able to have sports lighting or any new artificial pitches, games courts or ancillary facilities built on these sports grounds/playing fields, as this type of development is unlikely to receive planning permission on a Local Wildlife Site/SINC. Unfortunately, this issue was not picked up through our review of the proposed modifications in July 2023. This leaves us with only limited sites through this consultation where we can raise questions at this late stage about the change of designation from the existing designations for these sites within the adopted Local Plan to SINC (also known as Local Wildlife Sites).

The Government's Planning Practice guidance states that Locally designated 'Local Wildlife Sites' and 'Local Geological Sites' are areas of substantive nature conservation value and make an important contribution to ecological networks and nature's recovery (Paragraph: 013 Reference ID: 8-013-20190721). The government's planning policy guidance sets out in Paragraph: 014 Reference ID: 8-014-20190721 the standard criteria for Local Wildlife Sites (SINC). Sport England requests that the Council and the Inspector revisit whether the standard criteria have been correctly applied to existing playing fields and sports courts and car parks throughout in the London Borough of Richmond Local Plan, with reference to the information within the Council's Playing Pitch Strategy? We question the following changes in these main modifications;

#### **M082 Richmond Park and Associated Areas**

The proposal is to amend the SINC boundary to include East Sheen Common's cricket field, tennis courts and bowling green and associated land. Sport England objects to this re-designation. This is a sports facility, if in the future there were proposals to provide new sports facilities on the site, such as new padel courts with sports lighting or there was a proposal to put in an artificial cricket wicket or an additional area of sports lighting, these may not be permitted under the new designation. As highlighted above, there are tests set out in the Government's planning practice guidance for identifying Local Wildlife Sites (known as SINC in London) Paragraph: 014 Reference ID: 8-014-20190721 and it cannot be correct that a playing field meets this designation?

**RiL03 Pensford Field** – it is proposed to amend the boundary to include clay tennis courts and associated land. Sport England queries how clay tennis courts can meet the tests set out in the Government's planning practice guidance for identifying Local Wildlife Sites (known as SINC in London) Paragraph: 014 Reference ID: 8-014-20190721?

**MM29** – The alterations proposed to the text are not all correct (e.g. there are not 7 senior pitches) and the need to improve the changing facility is highlighted in the PPS. It is suggested that the paragraph is amended to read as follows;

The evidence set out in the Council's Playing Pitch and Outdoor Sports Strategy (2023) confirms that the sports ground needs to be retained; however, the pitches are overplayed. The PPS recommends that this is addressed through pitch quality improvements and

additional lighting or access to an artificial pitch to accommodate training demand. Improvements to the ancillary provision at the site are also required. The recent Action Plan updates have not identified any significant change to the situation.

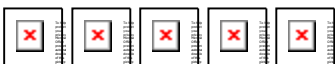
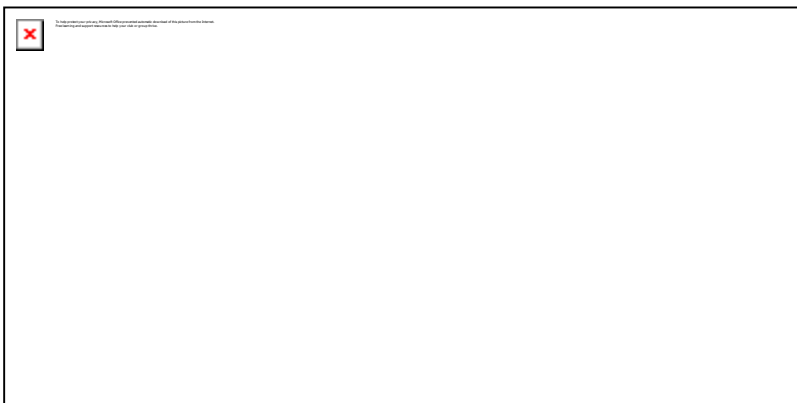
We welcome the opportunity to discuss these comments further,

Regards

Vicky

**Vicky Aston**  
Planning Manager

E: [REDACTED]



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