LONDON PLAYING FIELDS PROTECTION PROJECT



LONDON SPORT

KNIGHT, KAVANAGH & PAGE

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GLOSSARY

3G	Third generation (pitch)
ACV	Asset of Community Value
AFL	Australian Football League
ANGSt	Accessible Natural Greenspace Standard
BAFA	British American Football Association
BSUK	Baseball Softball UK
CCB	County cricket board
CFA	County football association
CIL	Community Infrastructure Levy
CPRE	Campaign to Protect Rural England (The Countryside Charity)
DEFRA	Department for Environment, Food and Rural Affairs
DfE	Department for Education
ECB	England and Wales Cricket Board
EFA	Education Funding Agency
FA	Football Association
FF	Football Foundation
FiT	Fields in Trust
GIS	Geographic information system
GLA	Greater London Authority
GMA	Grounds Maintenance Association
GSI	Green Space Index
HEIs	Higher education institutions
IoG	Institute of Groundsmanship
IMD	Indices of Multiple Deprivation
KKP	Knight Kavanagh and Page
LPFF	London Playing Field Foundation
MOL	Metropolitan Open Land
NGBs	National governing bodies (of sport)
NPPF	National Planning Policy Framework
PPOSS	Playing pitch and outdoor sport strategy
PPS	Playing pitch strategy
RFL	Rugby Football League
RFU	Rugby Football Union
SAPCA	Sports and Play Construction Association
SDS	Spatial development strategy
SuDS	Sustainable drainage system

EXECUTIVE SUMMARY OF CORE RECOMMENDATIONS

The majority of recommendations require engagement and commitment from combinations of some, or all key agencies involved in playing field protection and investment in London. These include the GLA, London boroughs, London Sport, Sport England, Parks for London, NGBs, the LPFF, clubs, leagues, community organisations and other key agencies.

Advocacy and pitch protection

There is a need to adopt a (more) strategic collective approach to the protection of playing fields by:

- Raising awareness among agencies with an interest in/influence over playing field retention/development about the contribution they make to people's physical and mental health and wellbeing and the need to protect and invest in playing pitch stock.
- Ensuring that the new London Plan maintains current levels of playing field protection.
- Taking a lead on provision of guidance about the actions that leagues, clubs, community groups etc., can take to resist playing field loss.
- Maintaining a watching brief in respect of the *Community Right to Buy* legislation and options to create assets of community value.
- Improve the level of strategic and practical collaboration between NGBs in London via adoption of a jointly endorsed strategic approach to facility protection and improvement.
- Create an effective platform/agency/system to enhance cross-agency communication to ensure that threats of playing field loss are detected and based on this, build an 'early warning system' *(risk register)* to identify and update 'at risk' venues.

If the Government elects to remove Sport England from its national list of statutory consultees, seek to make a specific case that it should retain its statutory role in the planning system *in London*.

The new London Plan

Policy and messaging related to the protection and improvement of playing fields should, at the very least, be as strong as it is in the current plan.

London Borough local plans

London boroughs should specify and deliver timely playing field needs assessment and strategy delivery within local plans (so that they are in place prior to plan finalisation).

Playing fields and outdoors sport needs assessments/strategies

As advocated in the current London Plan, all areas of London should be covered by up-to-date playing field needs assessments/strategies - to translate into the strongest possible playing field protection commitments in local plans. The key agencies involved should:

- Require/request that all London boroughs (or combinations thereof) which commission playing field needs assessments/strategies do so based on a consistent, comparable brief covering the same range of sporting/recreational amenities.
- Ensure that boroughs with very limited playing field provision (which export high levels of demand) are covered by these commissions and play their full part in their delivery.
- Require/request that all boroughs which commission playing field needs assessments/ strategies provide core data (in pre-agreed formats, ensuring compatibility/verification) to a secure central 'London database' held/managed by/on behalf of (say) London Sport to track supply/demand development and keep tabs on 'at risk', lost or new/upgraded sites.

Investment

Develop a (say 10-year) playing fields investment strategy for London which encompasses, for example:

- Assessment of the feasibility of developing strategic key sites for full-size 3G (or successor surface-based), hockey-surfaced and grass-based pitches - to encompass factors such as scale and suitability of existing site options, new/lapsed/derelict site alternatives, site accessibility via public transport etc.
- Allocation of developer contributions and (if possible) a London mayoral-led Community Infrastructure Levy) to enable the Football Foundation (and other funders) to make 'above-standard' capital contributions to key schemes – in return for whole community access.
- Partnering with/between multi-secondary school academy trusts in respect of a specific schools' grass and artificial pitches investment, directly linked to permanent community use operational management arrangements.
- With a particular focus on football and sports which utilise 3G or hockey pitches, consider options for multiple pitch sports-lit sites – at schools and existing unused/derelict sites.
- Create a fund to buy (or secure long leases on) such land.
- Review Football Foundation rules in respect of London borough eligibility for funding via the Grass Pitch Maintenance Fund because (with just a single exception) there are no town and parish councils in London.

NGBs

Improve the level of strategic and practical collaboration between NGBs in London. Adopt a joint strategic approach to facility protection and improvement aligned to, the function of an expanded London Pitch Sports Group to address issues such as:

- Season overlaps and the conflicts of use that occur.
- Retention of grass playing fields that are essential for certain sports.
- Balancing development of 3G pitches with the retention/improvement of hockey pitches.
- The skills deficit in respect of grass pitch, artificial turf pitch and fine turf maintenance.
- Linking funding directly to the evidence provided by up-to-date playing field strategies.
- Club and league understanding about how, why and when playing pitch sites come under threat and methods of combating this.
- Building the capacity of community sport organisations to own, manage and maintain sites which become available for asset transfer or purchase.

State schools-based provision

Commission specific work to establish a standardised approach to community use of school playing fields - to include.

- Linking community use allocation to clearer understanding of local need. Work with NGBs, leagues, accredited clubs and community organisations to ensure that the user group community value is factored into programming decision-making.
- Better dovetailing community use of school playing fields with what is accommodated at borough/private school-based provision and, in certain areas, the LPFF.
- Oversight to ensure that school community use agreements are monitored/adhered to.
- Gaining full school collaboration with playing field strategy processes.

Aligning to the proposal for a ten-year Football Foundation London playing field investment strategy, with the Harris Foundation (and other multi-academy trust providers) commission an options appraisal to assess the potential for London Sport to take forward some form of collective planning approach for schools-based playing fields provision.

Independent school and university provision

Consider how best to work with NGBs and organised leagues in key sports to determine whether more, regular, structured use of private school and university playing fields might be feasible. As part of this review establishments that have implemented successful community use programmes to establish, define and publicise best practice models.

Ensure that all HEI sports facilities in London are comprehensively listed and mapped and if/when disposal or change of use is proposed, London Sport and the relevant local authority are first invited to the table to discuss future options.

Dormant and derelict sites

Commission a specific study to assess known and unearth currently 'off the radar' unused and derelict playing field sites. To include:

- Identifying sites taken out of active use as playing fields for an extended period by developers and others looking to cash in on their 'hope' value.
- Assessment of factors such as site ownership (and owner aspirations), former uses, condition, dimensions, access, current protection and related covenants and other factors.
- Gauging potential to be brought back into use either as standard playing fields or as strategic key sites for inclusion in the London ten-year strategy.
- Provide outline capital and revenue cost estimates related to venue purchase, renewal and ongoing management.

Critical and at-risk sites

Develop and maintain a list of critical sites. Whilst all sites in London are important and require protection, these should be a focus for action, based on the priorities of the various pitch sports and local authority perspectives.

Collaborate to get key at-risk playing field sites designated as assets of community value (ACVs) further enhancing the level of protection secured. For smaller 'at risk' sites, explore site asset transfer options for appropriate clubs/community groups/trusts.

Environmental factors

Provide guidance/education about the mechanisms/processes that sport can adopt to address flooding/drought. Incentivise playing fields providers and sports clubs to adopt positive practices such as rainwater harvesting and the installation of ground source heat pumps

Provide guidance/education to help providers of artificial turf/3G pitches counter any negative environmental impact linked to microplastic pollution.

Provide education on the role of sports lighting, with latest technology limiting "light spillage" being less invasive (and increasingly so) to local communities.

Taking a different approach to artificial turf pitch development in London

Evaluate whether it is feasible to advocate for an official, more flexible London-specific approach to full-sized artificial turf/3G pitch development on new sites and grass pitch venues.

Consider how pitch design, fencing formats, sport lighting arrangement and spillage might be set up to enhance other site/park features to make artificial turf a complementary replacement for single/multiple grass pitches. Do this in tandem with installing improved mechanisms to reduce noise levels, mitigate sports lighting spillage and landscaping.

Extend the range of artificial grass pitches which have sports lighting *per-se*. In tandem, increase the number of (especially midweek evening) hours for which artificial turf pitches, tennis courts etc., are lit, open and available to the community.

London Sport role

London Sport should be more proactively involved leading/coordinating playing field protection making full use of support available from partner agencies. Principal areas for this are:

- Encouraging/assisting London boroughs to individually and collaboratively commission playing fields needs assessments and strategies.
- Develop (or commission) and maintain a database of playing field provision in London.
- Further develop and update the critical sites register.
- Commissioning a specific study to identify unused, derelict and at-risk playing field sites.
- Commission a study to look at how to secure regular, affordable community access to and related possible potential management mechanisms for, state schools' playing fields.
- Commission specific work to look at improving levels of regular, secure, affordable community access to the playing field facilities owned by independent schools and HEIs.
- Work with the Football Foundation and NGBs to develop a long-term development (multi-sport) capital investment strategy for London.
- (In partnership with others) develop mechanisms and support processes to help clubs, leagues community and sports partners to better understand how and why sites come under threat and who to contact when seeking support to protect right of access to existing venue or new access to unused or under-utilised facilities.
- Sharing good practice about where/how threatened sites have been 'saved'.
- Maintaining a watching brief in respect of the *Community Right to Buy* legislation being introduced in England.

PART 1: INTRODUCTION

The stated aim of this project is to improve sector understanding of the challenges faced and emerging trends which have an impact upon playing field access and protection in London and to consider how best to create and maintain the necessary evidence foundation to underpin future advocacy and protection effort.

Recognising the vital role that playing fields play supporting various communities to engage in sport and physical activity, in June 2024 London Sport ran an initial engagement and 'discovery' process with representatives of key strategic stakeholder groups; national governing bodies of sport (NGBs), London boroughs and landowners to:

- Review key challenges and trends and thus validate its initial understanding.
- Determine key trends and knowledge gaps that require further investigation.
- Determine the challenges and themes that merited deeper exploration.
- Identify potential solutions to key issues.

Subsequent to this, working with Sport England, it commissioned Knight, Kavanagh & Page (KKP) to produce a report to review and make suggestions about how it and other partners might tackle issues associated with loss of access to and the closure of playing fields in London. The process employed combines desk research, database development and extensive consultation with a wide range of agencies. These are listed in Appendix 1 and KKP would like to place on record its thanks for the time that members of staff from these bodies have taken to engage with the process.

Playing field and playing pitch definition

Sport England defines a playing pitch as "a delineated area which, together with any run-off areas, is of 0.2 hectares or more, and which is used for association football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, American football, Australian football, Gaelic football, shinty, hurling, polo or cycle polo." A playing field is then considered to be "the whole of a site that encompasses at least one playing pitch." This is also set out by the government in the 2021 'Town and Country Planning (Development Management Procedure) Order'.

Distinct from its definition above, Sport England's Active Places also includes/records sites which have at least one grass and/or artificial grass pitch marked out, without proscribing size limitations. Furthermore, in addition to delineated pitch areas (whether they meet the 0.2ha threshold or not), some sites also contain unrecorded space in the form of, for example, recreational play space or training grids. There is a consequential need to exercise caution in respect of Active Places figures related to the number of facilities in any given London borough, as it includes venues which cannot accommodate competition-based play for a number of sports. For sites where pitches were formerly in place but are no longer marked out, Active Places also applies a separate category (disused/lapsed).

While legal definitions are used to inform this report in terms of site identification, together with Sport England's Active Places Power database (a key tool in enabling this process), recommendations are made in respect of ensuring that all relevant agencies have a full understanding of these key differences – and the impact this has on participation.

For many sports at many levels, a playing pitch which is not full sized (or of sufficient size) according to the definitions and dimensions proscribed by the relevant NGB can (and often does) delimit the range, quality and competition/performance level of the matches played on it and/or restricts the extent to which it can accommodate both matches and training.



PART 2: STRATEGIC CONTEXT

This section seeks to set out relevant context, policies and strategies that have informed this project and/or that are relevant to the protection of playing fields in London.

London

In 2022, London's population hit a new record high of 8.9 million people. It is predicted to reach 9.6 million people by 2035.

Over the period between 2013-2023 population growth has been at its highest in East London, which saw an increase of 8.8%. South and West London had increases of 4.7% and 6.4% respectively, whilst Central London's population increase was just 1.3%.

London's population density is fifteen time greater than the rest of England. It has 5,690 people per km^2 compared to 379 people per km^2 elsewhere. Central London has the highest level of population density with 11,218 people per km2. This is almost twice the level of London overall.

London is significantly more diverse than the rest of the UK. In total, 46% of Londoners are from global majority groups, compared to 14% of England as a whole. West London has the highest proportion (at 53%) of its population, followed by East London (50%). The lowest level is South London (at 36%).

London's population is also, in general, younger than the rest of England. This is particularly true of Inner London, where nearly one quarter of people (23.5%) are aged between 25-34 (compared to just 12.7% in the rest of England). Almost half (48%) of the population is in their early twenties to early forties compared to 31.5% in the rest of England.

In contrast, the proportion of young children in Inner London reduced from 12.6% to 10.2% between 2013-2023, while over the same period in Outer London it fell from 14.1% to 12.6%. A relatively small proportion of the population (9.5% - Inner London, 13.8% in Outer London) is over 65 compared to nearly 20% in the rest of England.

London Sport, in its Impact Report (Summer 2023), suggested that London is facing an inactivity crisis pointing out that not all Londoners have adequate access to sport and physical activity. It reported that four in ten adult Londoners and more than half of all children do not meet recommended levels of physical activity while one in twelve do no activity at all.

It goes on to report that childhood obesity is more prevalent in London, where nearly one in four children leaving primary school is obese. It notes that communities who already face the greatest inequality challenges are also the most likely to be inactive, confirming that adults living in the most deprived areas of London are twice as likely to be inactive compared to those in the least deprived areas while children are three times as likely.

Generally, with one or two age group exceptions, poverty rates in London are higher than those in the rest of England. 140,000 children aged 0-4 are growing up in London households in poverty while one third (33%) of 5–9-year-olds, 35% of 10-14-year-olds and 37% of those aged 15-19 also live in households that are in poverty.

The London Plan

Upcoming London Plan

The London Plan is the Spatial Development Strategy (SDS) for Greater London. It will set out an integrated economic, environmental, transport and social framework for how London will develop over the next 20-25 years and the mayor's vision for good growth. Its policies should inform decisions on planning applications across the capital. In developing the SDS, the mayor has, in respect of policy on playing fields, had regard to:

- The principle that there should be equality of opportunity for all people.
- Reducing health inequality and promoting Londoners' health.

Individual London borough local plans must be in what is described as 'general conformity' with the London Plan to ensure that the planning system is joined up and enables London to develop sustainably.

Given that the current plan was published in 2021 and based upon the five-year review cycle, the mayor's office is preparing the next London Plan. The indicative timetable for this is:

- High level document – Towards a London Plan (originally expected April 2025).
- Draft London Plan consultation (by March 2026).
- Examination process (2026 – 2027).
- Adoption (2027).

The current London Plan (2021)

This states in Policy S5 (see Appendix 13) that it is essential that boroughs' plan strategically for future provision of core sports facilities and that they should assess the need for sport and recreation facilities to ensure appropriate levels of provision and help tackle inequality of access in London. This applies particularly in areas of, or for groups with, low participation levels. It goes on to note that those involved in planning and development must:

- Promote more active healthy lives for Londoners enabling them to make healthy choices.
- Assess the potential impacts of development proposals and development plans on the mental and physical health and wellbeing of communities…to mitigate potential negative impacts, maximise potential positive impacts, and help reduce health inequalities.
- Plan for improved access to and quality of green spaces, the provision of new green infrastructure and spaces for play, recreation and sports.

It confirms that sport and recreation facilities are important components of social infrastructure and notes the variety and complexity of sport and recreation services and facilities. It also states that London boroughs should work collaboratively to ensure that they fully understand existing and future social infrastructure needs. This includes stating that *needs assessments should be informed by an understanding of demographic make-up and socio-economic data as well as audits of existing facilities and services*. It affirms that to ensure sufficient supply of good quality sports and recreation facilities, boroughs should:

- Prepare development plans informed by a needs assessment for sports and recreation facilities and that need should be assessed *'at local and sub-regional level.'*
- Secure sites for a range of sports and recreation facilities in development plans, *as justified by the needs assessment.*
- *Where possible, protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood served.*

Reflecting other London Plan policies, it goes on to state that development proposals for sports and recreation facilities should:

- Increase/enhance provision of facilities in accessible locations.
- Maximise the multiple use of facilities and encourage the co-location of services.
- Support provision of sports lighting where there is identified need.

Directly reflecting policy statement in the National Planning Policy Framework (NPPF) – see Appendix 3, it states that existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:

- An 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
- 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
- The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.

In referencing the fact that, by their nature, sports facilities often form a part of open spaces, it suggests that sport facilities and open space needs assessments should have regard to one another. It also (providing a specific link to Sport England's Playing Fields Policy and Guidance) notes that an up-to-date playing pitch strategy (PPS) can be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. It is worthy of note and a material consideration in respect of playing field protection and PPS value that, in recent times, planning inspectors have given this the same weight as the NPPF.

A growing number of PPS studies are being extended and referred to as a playing pitch and outdoor sports strategy (PPOSS). This does not have a material difference in terms of their content or importance; the broader term simply denotes the inclusion of additional non-pitch sports such as, for example, tennis, netball, bowls, athletics and golf.

Sport England guidance

The guidance provided in the NPPF is supplemented by the abovementioned Sport England guidance which is, in part, based on its status as a statutory consultee on planning applications that affect or prejudice the use of playing field provision used within the last five years. (More detail about this is provided in Appendix 4).

London Playing Field Foundation (LPFF): A Charter for Playing Fields in London

The key premise of the LPFF proposal is that once a playing field is lost to development it is lost forever. It makes the (still relevant) point that national policies on planning for and protecting playing pitches and other outdoor sports facilities have attempted to strike a balance between the desire to protect playing fields and a pragmatic recognition that in some circumstances the disposal of all or part of a playing field site for development can be justified.

In conceding this, it notes that the housing development pressure faced by many, if not all, London boroughs is very high – and all are being pressed to find space to enable development of more dwellings. It goes on to accepts that existing policies 9or the application thereof) has not always succeeded in protecting valuable playing fields and grass pitches, particularly in London where land values are particularly high.

In confirming its view that protective measures for playing fields are inadequate and pointing out the absence of a definitive position on the actual loss of playing fields across the capital, it noted that there is no comprehensive, accurate up to date assessment on playing fields.

It recommends that the GLA commission an updated pan-London Playing Field Audit to use as a benchmark on the diminishing stock of playing fields and provide an evidence base to protect existing sites.

More detail about this is included in Appendix 5.

CPRE (London)

CPRE campaigns to protect green belt and green spaces. It is also directly involved in publicising and seeking to support local groups dealing with playing fields where access has ceased and/or is being restricted for a range of reasons.

In November 2023, it published a report *Protecting Space for Sport in London*, discussing issues such as golf and London's playing fields. In this, it points out that high land values are leading to developers buying more of London's playing fields for their 'hope value' and taking them out of use with a view to communities eventually forgetting about them.

The report also observes that developers have a vested interest in promoting the lifting of land protections. It recommends that the new London Mayor refrains from driving what it describes as speculative purchases of playing fields and golf courses by implying that some protected land is 'worthless.'

Others

The Sported Winter 2024 report on issues facing grassroots sport[1] notes that more backing is needed to avert the risk of losing community hubs and that young people are disengaging or reducing their participation in, sport and physical activity because they can no longer afford it. In pointing out that one in five young people face inequitable access to sporting opportunities and activities it cites facility availability, affordability and non-adjacence as key barriers when detailing the challenges that threaten the survival and continuity of grassroots clubs. It specifically mentions:

- Rising costs – over 90% of clubs are extremely or fairly concerned about the impact of rising costs on their operations – a particularly acute issue in areas of high deprivation.
- Participation and mental health – the potential decline in participation due to financial constraints could have long-term negative effects on the health and development of young people.
- Volunteer stress/burnout – among those who run clubs and teams (93% of those overseeing community organisations say that their role has become more stressful over the last two years - exacerbated by financial difficulties and the additional demands placed on them to keep clubs running smoothly).

1. https://sported.org.uk/wp-content/uploads/2025/10/Winter-2024-Pulse-England.pdf

PART 3: LONDON PLAYING FIELDS OVERVIEW

Number of sites

There are, according to Sport England's Active Places and KKP's own additional research, 1,804 playing field sites currently in London, although it is recognised that some may be unaccounted for due to not all boroughs having a PPS/PPOSS (or similar) in place. When considering these figures, reference should be made to the section defining playing fields and playing pitches on page 2 of this report. This notes that, to be classified as a playing field, a site needs to contain one or more playing pitches of at least 0.2 hectares.

Figure 3.1: Number of playing field sites – by London borough

London borough	No. of playing field sites	London borough	No. of playing field sites
Barking & Dagenham	36	Hounslow	78
Barnet	132	Islington	10
Bexley	89	Kensington & Chelsea	7
Brent	54	Kingston-upon-Thames	48
Bromley	148	Lambeth	21
Camden	9	Lewisham	41
City of London	1	Merton	58
Croydon	106	Newham	41
Ealing	78	Redbridge	63
Enfield	96	Richmond-upon-Thames	82
Greenwich	69	Southwark	40
Hackney	14	Sutton	57
Hammersmith & Fulham	15	Tower Hamlets	15
Haringey	40	Waltham Forest	44
Harrow	74	Wandsworth	36
Havering	75	Westminster	6
Hillingdon	121	**Total**	**1,804**

The level of provision is also markedly different across the London boroughs, with some hosting a significant number of sites and others, especially in Inner London, providing comparatively few.The largest number and proportions are identified in Bromley (148 sites), Barnet (132) and Hillingdon (121), whilst City of London, Westminster, Kensington & Chelsea, Camden and Islington all have ten or fewer sites.

Site ownership

Playing field sites are owned and managed by a range of agencies including local authorities, state/private schools, universities, charities and commercial organisations. A breakdown is provided below. Educational establishments and London boroughs are the largest providers.

Table 3.2: Summary of playing field site ownership in London (number of sites)

Local authority	661
Education	782
Sports club	205
Community organisation/ trust	21
Commercial/ private	50
Government/ MOD	14
Other/ unknown	71

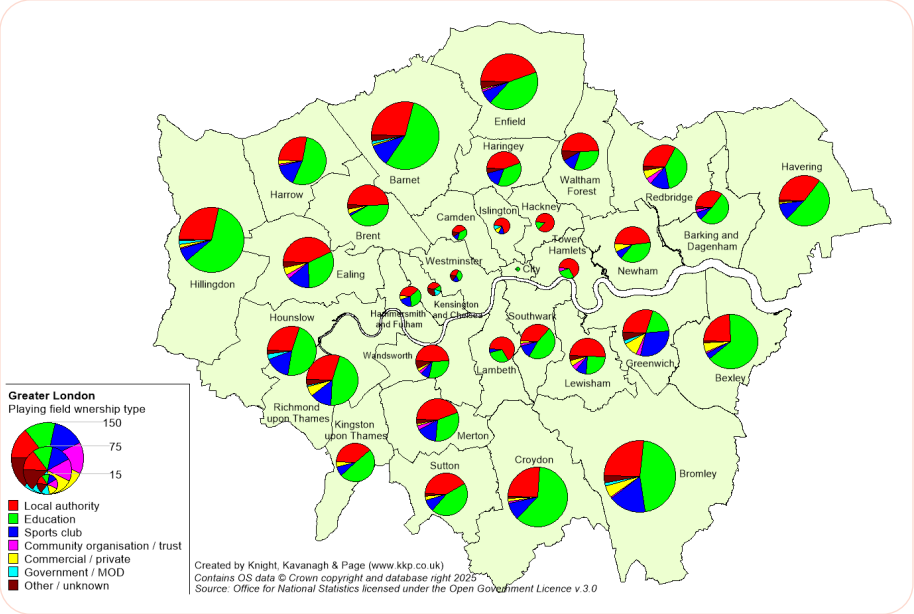
A further breakdown of the figures by local authority is shown in the table overleaf.

Table 3.3: London boroughs - ownership types of playing field sites

Borough	Local authority	Education	Sports club	Community org./trust	Comm./ private	Govnt/ MOD	Other/ unknown	Total
City of London	-	1	-	-	-	-	-	1
Barking & Dagenham	13	18	3	1	-	-	1	36
Barnet	39	72	14	-	1	2	4	132
Bexley	22	57	3	1	5	-	1	89
Brent	27	22	1	-	2	-	2	54
Bromley	40	67	25	1	8	2	5	148
Camden	4	3	1	-	-	-	1	9
Croydon	28	64	10	1	2	-	1	106
Ealing	34	24	11	2	4	-	3	78
Enfield	43	40	7	1	1	-	4	96
Greenwich	21	13	20	2	7	2	4	69
Hackney	12	2	-	-	-	-	-	14
Hammersmith & Fulham	6	5	3	-	1	-	-	15
Haringey	18	14	6	-	-	-	2	40
Harrow	21	39	11	1	2	-		74
Havering	27	38	8	-	1	-	1	75
Hillingdon	35	72	8	1	2	2	1	121
Hounslow	24	36	13	-	-	3	2	78
Islington	7	-	1	-	1	1	-	10
Kensington & Chelsea	3	1	-	-	-	1	2	7
Kingston-upon-Thames	19	23	4	-	2	-	-	48
Lambeth	14	6	1	-	-	-	-	21
Lewisham	21	10	4	2	2	-	2	41
Merton	26	18	9	2	1	-	2	58
Newham	20	15	3	-	3	-	-	41
Redbridge	21	24	9	3	4	-	2	63
Richmond-upon-Thames	25	37	11	-	5	1	3	82
Southwark	15	18	5	1	1	-	-	40
Sutton	24	25	5	-	2	-	1	57
Tower Hamlets	10	4	-	1	-	-	-	15
Waltham Forest	22	13	5	-	-	-	4	44
Wandsworth	18	10	3	1	1	-	3	36
Westminster	2	2	1	-	-	-	1	6
TOTAL	**661**	**793**	**205**	**21**	**58**	**14**	**52**	**1,804**

This can then be further visualised via the figure below.

Figure 3.4: Playing fields by ownership type within each London borough.



Current playing pitch needs assessment/strategy status



The table below shows the current PPS status of London boroughs.

Table 3.5: PPS/PPOSS status by London borough plus number of playing field sites

London borough	No. of sites	PPS status[2]
Barking & Dagenham	36	In development
Barnet	132	Adopted 2022
Bexley	89	In development
Brent	54	In development
Bromley	148	In development
Camden	9	No PPS
City of London	1	No PPS
Croydon	106	Out of date
Ealing	78	Adopted 2022[3]
Enfield	96	Out of date
Greenwich	69	In development
Hackney	14	In development
Hammersmith & Fulham	15	In development
Haringey	40	Out of date
Harrow	74	Adopted 2024
Havering	75	In development
Hillingdon	121	Out of date
Hounslow	78	In development
Islington	10	Out of date
Kensington & Chelsea	7	No PPS
Kingston-upon-Thames	48	Adopted 2023
Lambeth	21	In development
Lewisham	41	Out of date
Merton	58	In development
Newham	41	Adopted 2024
Redbridge	63	In development
Richmond-upon-Thames	82	Adopted 2023
Southwark	40	Out of date
Sutton	57	In development
Tower Hamlets	15	No PPS
Waltham Forest	44	In development
Wandsworth	36	Adopted 2024
Westminster	6	In development

2. As of March 2026.
3. Updated annually.

Authorities with no, or an outdated PPS are where figures are normally least reliable/accurate. Whilst boroughs with few sites (e.g., Camden, Kensington & Chelsea, Islington and Tower Hamlets) tend not to have a PPS or needs assessment, some with large site numbers (such as Enfield and Hillingdon) are also without a current PPS – this is generally due to their needs assessments/strategies being out of date rather than them not having been in place at all.

The difference between Sport England Active Places data and PPS-generated information

Active Places includes a significant number of smaller sites (below 0.2 hectares) that may be being used for play, despite not conforming to the legal definition of a playing field site. Typically, those with only a mini 5v5 football pitch (or pitches) are discounted, as are those with only small artificial pitches and/or multi-use games areas (MUGAs).

Table 3.4: Summary of the number of playing field and Active Places sites[4]

Authority	Playing field sites	Active Places sites	Difference
Barking & Dagenham	36	46	+10
Barnet	132	139	+7
Bexley	89	96	+7
Brent	54	65	+11
Bromley	148	151	+3
Camden	9	22	+13
City of London	1	2	+1
Croydon	106	116	+10
Ealing	78	86	+8
Enfield	96	102	+6
Greenwich	69	73	+4
Hackney	14	26	+12
Hammersmith & Fulham	15	24	+9
Haringey	40	48	+8
Harrow	74	78	+4
Havering	75	80	+5
Hillingdon	121	127	+6
Hounslow	78	92	+14
Islington	10	32	+22
Kensington & Chelsea	7	15	+8
Kingston-upon-Thames	48	56	+8
Lambeth	21	40	+19
Lewisham	41	46	+5

4. Please see the accompanying project database for further levels of detail.

Authority	Playing field sites	Active Places sites	Difference
Merton	58	67	+9
Newham	41	52	+11
Redbridge	63	66	+3
Richmond-upon-Thames	82	85	+3
Southwark	40	56	+16
Sutton	57	63	+6
Tower Hamlets	15	26	+11
Waltham Forest	44	52	+8
Wandsworth	36	55	+19
Westminster	6	20	+14

This clarification means that 300 sites have been filtered out for the purpose of providing the above tables. However, some of these still need to be considered moving forward due to the local demand for which they cater (such sites are also commonly included within PPS work). In particular, those authorities that have a large number of "undersized" sites and a minimal number of sites that fit the playing field definition will have a large reliance on the provision that has been discounted. This therefore includes the likes of Kensington & Chelsea (only site playing field sites but with 15 Active Places sites), Westminster (six playing field sites and 20 Active Places sites) and Islington (10 playing field sites and 32 Active Places sites). It is also no coincidence that these are all inner-London boroughs.

Furthermore, of the Active Places sites that have been discounted, the majority are located at school sites that will therefore be meeting curricular and extra-curricular needs. This relates to 154 sites. There are also a relatively large number of local authority operated sites (54).

Provision in state schools

A substantial proportion of the actually or potentially available playing field stock in London is on education premises.

There is a very strong (national) policy presumption against the disposal of school playing field land. Whilst, according to the DfE register of decisions of playing field land disposals (updated 6 November 2025)[5], relatively few London schools have lost playing fields in recent years, anecdotal evidence from consultees would suggest that there has been pressure on schools-based playing fields (and other sports facilities) over an extended period. This is reportedly predominantly based either on schools needing to cater for increasing pupil numbers or on them looking to expand capacity to teach other subjects.

While playing field provision on school sites is protected, consultation suggests that efforts to use available powers to limit school-built facility expansion onto playing field space are not always successful. In effect, the need for 'protection' is, on occasion, trumped by the need for broader school education capacity.

5. https://www.gov.uk/government/publications/school-land-decisions-about-disposals/decisions-on-the-disposal-of-school-land#approved-applications

In respect of making school playing fields available to the community, this has been impacted upon by the growing number of academies, where local authorities have little to no control over aspects such as community availability. Schools are increasingly likely to have their own policies, with these also likely to be subject to change on the basis of the approach taken by, for example, new headteachers, facility managers or governors.

While a substantial proportion of schools still accommodate community use, the extent to which it is coordinated and geared to optimising the community value of such use is limited. A considerable number utilise letting agencies for which the main instruction and motivation is to maximise the level of income generated.

Other schools have entered partnerships with 5-a-side football operators – a process that in exchange for capital investment, often sees school fields 'carved up' into small-sided pitches that the operators then run during after school hours and at weekends.

While there is undoubtedly a substantial market for this form of the game and many people's needs are met, provision of such amenities at the expense of full-sized grass and artificial pitches for football, hockey, cricket and other sports has led to a net loss of capacity for organised competitive junior and adult league-based participation.

Numerous schools reportedly do not allow for community use at all. There can be a variety of reasons for this but is most commonly because they do not consider it to be financially viable given the additional maintenance and staffing requirements perceived to be needed. Furthermore, some schools-based playing field provision is technically available but remains unused. This is often attributed to pricing structures and a lack of promotion (i.e., potential users do not realise that provision is available).

Consultation with the Harris Federation, which runs 55 primary and secondary academies – many in London, confirmed the wide variety of approaches taken by its individual schools in respect of allowing and/or organising community access to school playing fields.

While there is a general interest in doing this, it is acknowledged that whether this process is managed by schools or by commercial lettings agencies, it is not in general underpinned by an appreciation of strategic need, or done in partnership/conjunction with NGBs, leagues, other strategic agencies or Harris itself (other than its oversight and orchestration role).

The Harris Federation confirmed that, at present, except for its work supporting schools to commission building and development work and to issue management contracts to letting agencies, it is not proactively involved in encouraging and shaping approaches to community use. Its schools, thus, adopt a variety of approaches, ranging from no community access to full availability managed, for example, in-house or via an external lettings company.

The (understandable) emphasis on surplus generation also, certainly latterly, relates to a better understanding of the need for better planning for the maintenance and renewal of grass pitches and artificial grass pitch carpets. It may also present opportunities to link processes to improve the quality of school pitches to concurrent efforts being made to reduce the incidences of flooding at school sites.

While there is a strong strategic commitment to school autonomy in academy chains, it is also acknowledged that there is an opportunity to be more strategic in respect of orchestration of more community and sports development beneficial use and to encourage schools to be more proactive partners assisting other agencies in their localities to meet strategically assessed demand.

Provision at independent schools

Independent schools own a substantial proportion of the non-public sector playing field provision in London. They, arguably, manage some of the best (and many of the larger) sports grounds in London. Protection does not appear to be regarded as a major issue, although current plans by international private schools' group Cognita to sell off the grounds of the Cumnor House Preparatory School in Croydon are presently attracting attention.

One issue raised during consultation relates to the sale of public (and university) pitch sites to private schools and an accompanying loss of access. In most cases it would appear that subsequent community use is very limited, albeit there are cases that could be used to encourage and promote more external activity.

A good example of the community use of a private school's facilities appears to be the King's House Sports Ground. This former Civil Service Sports Ground was purchased by the school in 2010. It reportedly hosts a variety of other local schools plus the Civil Service FC's 11 teams. Other clubs which play at the site include Wayfarers HC (thought to be the largest hockey club in the UK) and London Scottish RUFC (mini and junior rugby union) plus its amateur teams. It is reported that more than 100 different rugby hockey, football, cricket and lacrosse clubs use the ground for training and home fixtures.

Conversely, the pitches Catford Pitz (a formerly public) site were purchased in 2011 by St Dunstan's College. One planning condition for the development was that the school should share facilities with the community. Despite this, it initially reserved the fields for sole use by its students but (as we understand it following intervention by Sport England and London Sport) it does now allow a small level of local use whereby a local charity has access to its sports-lit pitches on Monday evenings to offer football sessions for young people in Catford.

Albeit that the time made available is very limited, this arrangement is reported to have led to further interaction with Lewisham Council, local community groups, other schools in Catford, the Chelsea (FC) Foundation and Westside and the Lewisham young leaders' academies which help disadvantaged African, Caribbean and dual-heritage children aged 8-18.

More generally, independent schools make considerable play of the extent to which their facilities are available to other schools and the community, and this has been part of the rationale for their charitable status. However, the extent to which facilities are offered and how it adds up to what might reasonably be expected to service the needs of community pitch sport clubs/teams is debatable. Consultation would suggest that, in many cases, it is very limited and there is little doubt that in certain instances, lip service is being paid.

Evidence from recent PPS work unearths examples of large independent schools seemingly offering little to no community access of their playing fields. These include Hampton School in Richmond-upon-Thames. Eltham College in Bromley offers limited but arguably insufficient, access for hockey and cricket. The former has four football pitches, one 3G pitch and four cricket squares with no community use identified, whilst the latter has four football pitches and six cricket squares that are reportedly virtually unused externally. Although rugby union and hockey pitches are accessed at the sites, even where usage is received, challenges can remain, particularly when no long-term agreement is in place. This can result in the schools ceasing to offer future access at any point.

It may be that, in particular because of the access problems faced in London, there is a case to evaluate the feasibility, possibly working with one or two of the schools presently doing this in an effective way, to create a better definition of what a good level of community access to private school playing field provision looks like. Providing some indication of the scale of occupancy, affordability and the nature of user clubs and groups against which to benchmark might more credibly validate schools' claim for charitable status.

Higher education provision

A number of higher education institutions (HEIs) have disposed of playing fields over the last 10-20 years and the issues connected to their after-use are, as is the case at Udney Park (see case study below), on occasions unresolved. There would be value in both ensuring that all HEI sports facilities in London are comprehensively listed and mapped and in having an ongoing dialogue with the London HEI sector to ensure that if/when site status changes and the institution in question is considering disposal or change of use, London Sport and the relevant local authority are first to the table to discuss future options.

PART 4: EXISTING PROBLEMS AND PRESSURES

There is no question that some of the issues that apply to the provision, cost, value and preservation of playing fields in London are unique (in the UK at least) to the capital. Furthermore, the pressure being placed on existing provision and the need to protect and maintain playing fields and green spaces to meet demand is becoming increasingly problematic.

According to the LPFF, London is home to 16% of the UK population but only has 8% of its playing fields. In addition, the LPFF's 2018 fields at risk register estimated that, at that point in time, London had lost 20% of its grass football pitches and 41% of its natural turf cricket pitches since 1990 (although in some cases a playing field may now encompass artificial grass pitches and/or other forms of sports provision (e.g., sports halls) which have replaced its former grass pitches and are still used for sport)[6]. They key point made here is that there is no regular 'universal' audit to assess the exact number of playing fields lost – whether to 'appropriate development', neglect, 'hope value' or housing.

Planning and finances – London boroughs

According to London Councils – in a press release issued on 30 October 2025[7] - based on a survey of all 33 London local authorities organised by the Society of London Treasurers, the collective London boroughs funding shortfall is £1 billion this financial year. Over the four years (2025-26 to 2028-29) the cumulative budget gap for London local government is forecast to be £4.7billion and half of boroughs could require emergency support to avoid bankruptcy by 2028.

It warns that further cuts are 'inevitable' and confirms that London boroughs need to make savings of around £600m in the 2025-26 financial year to close the gap between available resources and spending on services. This is in addition to the £400m of Exceptional Financial Support received by seven boroughs. Because local authorities have a legal duty to balance their budgets (i.e. they cannot carry a deficit into the next financial year), London boroughs will need to deliver savings to address this gap or face using their one-time financial reserves.

London Councils indicates that local provision of libraries, children's centres, waste collection, road maintenance, and sports and leisure facilities could all be (adversely) impacted.

It is universally predicted that, going forward, more careful planning and management of resources will be needed. However, the London Green Spaces Commission Review (2020) found that in the ten years to 2019, £4 billion was cut from core funding for local services in London. Over the same period, spending on open spaces by local authorities fell by over 30% while London's population grew by around 900,000 people (11.2%). The Review was charged with identifying new models to deliver and manage London's green spaces to help support boroughs transform how parks services are managed and funded. It made two key recommendations, which were subsequently undertaken, these were to:

- Establish and resource a centre for excellence for London's public parks and green spaces (Parks for London).

6. https://www.lpff.org.uk/protecting/protecting-playing-fields/
7. https://www.londoncouncils.gov.uk/news-and-press-releases/2025/london-boroughs-face-impossible-ps4bn-funding-gap-coming-years

- Establish a future greenspace skills programme to develop 'green skills' in London, bringing together providers and employers. This was to be taken forward via the Mayor's Skills Academies programme and the London Green Space Skills hub - led by Groundwork London and Parks for London.

Worsening finances within London boroughs are likely to have a significant impact on playing fields, both in relation to their preservation and protection. Issues created include:

- Maintenance resources – budgets are being cut and maintenance regimes are likely to continue to reduce. This will result in worsening quality and either less use capacity or overuse, which will have a further detrimental effect.
- Lower levels of expertise/knowledge – as London borough departments shrink (or vanish), local knowledge of playing field sites and their importance reduces.
- Land sale/transfer will increase the vulnerability of playing field sites, with such venues being assets that can be used to secure additional funding.
- Aligned to this, the relaxation of rules related to councils being allowed to sell (as yet not fully defined) assets may also threaten playing fields which, as evidenced in some of the case studies, can be prime targets for developers.
- The authorities will be allowed to use Treasury loans or cash from selling assets to cover day-to-day spending, which they are normally banned from doing.
- The figure is up from the nineteen that requested such flexibility this year, further underscoring the continued financial fragility of the sector.
- Increased access costs – pitch and ancillary facility hire (or lease) costs are rising to generate increased income and offset costs. This will further price out some user groups and may, thus, lead to less usage.
- Limited available funds to commission playing pitch needs assessments and strategies.

Delivery of playing pitch (and outdoor sports) strategies – OOS/PPOSS

It is a 2021 London Plan requirement, GLA advice and a key tenet of NPPF/government planning practice guidance that authorities undertake needs assessments and produce PPSs. This objective has not been achieved in London as a substantial number of boroughs do not have an up-to-date PPS study (or similar) in place, as shown above in Table 3.5. This means that there is no contemporary evidence base to argue the case and/or provide this demand evidence-based support to help protect playing field sites within these authorities.

As per Sport England's guidance, the lifespan of a PPS is three years, although this can be increased when it is kept up to date (i.e., via regular meetings with the steering group and/or key stakeholders). As shown in the table above, of the 33 boroughs, seven have up-to-date PPS studies and a further 15 are in development. These leaves 11 with either no PPS or an outdated study.

Furthermore, as far as is known, only one local authority is currently keeping its PPS up-to-date, in line with Sport England guidance (via the process outlined within Stage E). This is Richmond-upon-Thames.

Playing field condition and quality

While the number of playing fields is an ongoing and emotive issue, of equal importance is the quality of provision, its accessibility, realistic carrying capacity and the condition of the ancillary facilities that service players, officials and spectators. There is an almost universal confirmation that the quality of public sector owned/managed grass pitch stock is declining. This is ascribed to a range of factors, primary among which is the difficulty London boroughs face finding ways to invest in the maintenance, repair and renewal of playing fields and the associated changing facilities. This is linked to the reported facts that:

- (As noted above) London authorities (in common with counterparts throughout England) face very significant budgetary challenges. In amongst the range of issues with which they must deal, playing fields are a relatively low (and for many getting lower) priority.
- These budgetary pressures, in most boroughs, severely limit the investment made in playing fields (including pitches/surfaces/amenities and ancillary facilities) site maintenance and development. This is also hampering capacity to match fund potential external investment in key amenities. This means that, progressively, grass playing field quality and carrying capacity is declining.
- The use of playing fields is, in most boroughs, subsidised in respect of the cost of upkeep relative to hire charges. In common with other aspects of public sector provided sport/leisure provision, there is pressure to bring this closer to a break-even figure.
- The level of expertise available within London boroughs (and to a degree other agencies) in respect of playing field and fine turf maintenance and improvement is low and reportedly still declining.

As an example of pitch quality issues faced, based upon from PPS studies recently delivered by KKP, most London boroughs would appear to have a higher proportion of ‘poor’ quality provision than ‘good,’ particularly in relation to football. For instance, Richmond-on-Thames (assessed in 2023) had 31 poor quality football pitches (24%) as opposed to 17 good quality pitches (13%). This is also indicative of a worsening picture when comparing pitch quality as part of this PPS process to quality levels assessed in earlier, comparable PPS audits.

By way of additional comparison, based on other PPS studies recently completed, Kingston-upon-Thames had 35 poor quality football pitches (36%) and only 24 good quality pitches (25%) – PPS 2023, while Sutton has 33 poor quality pitches (35%) and 31 good quality pitches (33%) – PPS 2025. Newham, based upon its 2024 PPS, has nine poor quality football pitches (36%) and only four good quality pitches (16%).

The main outlier from available data is Westminster which, in its emerging PPS has 34 pitches identified as good quality, three as standard and none as poor. In addition, Bromley also seemingly has more good quality pitches (65) than poor (43), although this still means that several sites need considerable improvement.

The table below further summarises the quality picture across London where KKP has led on in-date PPS work. For consistency purposes, this presents only the findings across the main included pitch sports of football, rugby union, rugby league, cricket and hockey (including artificial turf-based provision).

Table 4.2: Summary of pitch quality findings across KKP's (in date) PPS studies

Authority	Good quality pitches	Standard quality pitches	Poor quality pitches
Bromley	65	202	43
Kingston-upon-Thames	37	60	39
Newham	7	17	17
Richmond-upon-Thames	41	132	42
Sutton	40	46	37
Westminster	34	3	-

The sport with the highest proportion of good quality pitches and lowest proportion of poor ones is cricket. This has a significant impact on the numbers above. It is considered to primarily be the consequence of cricket clubs being more likely to manage and/or maintain their own sites, rather than relying on local authorities or other operators such as schools.

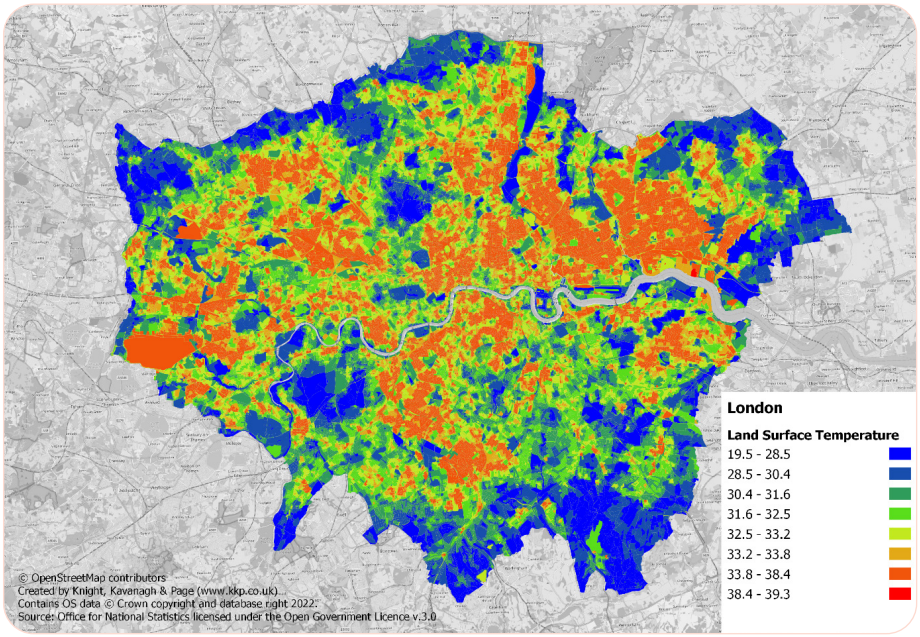
For further context, it is also worth noting that, according to the 2024/25 FA 3G Pitch Register, just under 30% (65/220) of the registrations of FA/FIFA approved 3G pitches in London have expired or are due to expire soon. Technically this means that they either already cannot or soon will not be able to be used for FA affiliated football or competitive match play. (See Appendix 7). While it can legitimately be assumed that the inspections needed to enable register renewal of some of those due to expire soon will be implemented, this still leaves a substantial proportion actually/potentially without the necessary registration.

It should also be noted that need in respect of quality is changing, particularly in relation to the growth in women's and girls' sport as well as disability participation. This has led to increased/ improved provision requirements, especially for changing and ancillary facilities to enable, for example, a suitable level of inclusivity and mixed-gender access. The consequence is that even buildings previously considered to be 'good' quality may now still require investment to bring them up to modern standards.

Environmental factors

Grass pitches and related space can play an essential role in the mitigation of drought via, for example, rainfall capture and in reducing the 'urban heat island affect', whereby materials such as roads and buildings absorb and retain more heat than natural surfaces like grass or woodland.

Figure 4.1: Average London land surface temperature comparisons (built, green, blue space)



Consultation for this report confirmed that the environment aligned to the lower level of investment being made in the management of resources (as noted above) is having a significant impact on the maintenance and management of sports pitches. Climate change and associated increased periods of more extreme weather have created challenges to established processes of pitch preparation and maintenance.

Game Changer II[8] was published by the British Association for Sustainable Sport in 2023. It assessed the (national) impact of climate change on sport in the UK and noted that 60% of cricket players/ spectators had experienced disruption (such as rescheduling, reduction in duration of matches) in the year from October 2022-October 2023 due to weather extremes associated with climate change. The figure for football was 40%.

Sported's Winter 24-25 'The Pulse' bi-annual (national) research report (referenced earlier) into the UK community sport sector surveys organisations operating at grassroots level who deliver physical activity for young people[9]. It notes that such groups are seeing the impact of climate change on their activities, with flooded and waterlogged pitches/venues and adverse weather impacting on activities in the last six months. One quarter of respondents (24%) said their group's activities had been impacted by climate change in the past six months.

8. https://basis.org.uk/wp-content/uploads/2023/11/Game_Changer_2.pdf
9. https://sported.org.uk/wp-content/uploads/2025/10/Winter-2024-Pulse-England.pdf

The Environment Agency has warned that within 25 years London could run out of water. The 2024 London Climate Resilience Review[10] an independent report, commissioned by the Mayor of London is clear about the need to minimise water usage. It includes a range of recommendations about the capital's blue and green infrastructure which have direct relevance to agencies managing, maintaining and wishing to use playing fields.

Flooding

The above mentioned 2024 London Climate Resilience Review also states that recreational and professional sport face significant climate impact, noting that parks and other grounds will more frequently be saturated by heavy rainfall (which will adversely affect Londoners' access to sport). This will have associated consequences for health and wellbeing.

The London Surface Water Strategy (July 2024) points out that paving over gardens and other green areas (including playing fields) with impermeable materials that do not naturally drain, significantly contributes to large volumes of rainwater rapidly gathering in, and around, urban areas during heavy storms. It cites 2010 research which indicated that, at that point, green garden space two and a half times the size of Hyde Park was being lost in London every year and that there has also been much development in London since that time.

According to City Hall, more than one fifth of all London schools suffer from rainwater flooding, causing playing fields to be waterlogged. In April of this year (2025) the GLA issued a 'climate resilient schools' contract which will lead to the design, building and installation of approximately 800 sustainable drainage system (SuDS) planters at 100 of London's most flood prone schools. SuDS manage roof rainwater runoff, reducing the impact of flash flooding during periods of heavy rainfall by slowing the flow of surface water. Slow release and overflow pipes are fed directly to building drains thus preventing overwhelming drainage grates and grids of the building and adjacent roads/tarmac areas.

This is a cross-boundary issue, and it will, when looking to defend and/or improve playing fields, be increasingly important to be aware of London's Critical Drainage Area Framework. It is also necessary to ensure that retention/improvement of playing fields is considered when the planned installation of 7,000 hectares of SuDS across the City takes place.

Drought

The joint FA, ECB, Institute of Groundsmanship (IOG) and Sport England report 'Successful Management of Dual Use Cricket and Football Sites' notes the impact that climate change is having and the increased periods of more extreme weather – both high rainfall and drought. It references the challenges this adds to pitch preparation and the requirement for more careful planning and management of resources. Water management is a key consideration in both periods of high and low rainfall. As rainfall increases it may become necessary to obtain covers to protect run ups for cricket matches or introduce new drainage systems.

The report confirms that processes designed to minimise the effect of extreme weather take a variety of forms, dependent upon site-specific problems. It makes the point that, in London, water management is a key consideration during periods of both high and low rainfall.

10. https://www.london.gov.uk/sites/default/files/2024-07/The_London_Climate_Resillience_Review_July_2024_FA.pdf

This is a particular problem for cricket. Grounds Management Association (GMA) guidance cites the Environment Agency's legal obligations plus those of water companies and others to plan for and to manage water use, noting the requirement (on individuals/organisations such as cricket clubs) to restrict this during periods of prolonged dry weather and drought. During such periods, watering pitches and squares is only permitted where there is a risk to health and safety, for example where cracking/wear is at a level which affects player safety.

Even where exemptions are allowed, there are often peak hour restrictions. There is, thus, a need to ensure that all owners/managers of pitch sites have the knowledge, capability and technology to use water effectively and efficiently and know how best to marshal their resources when faced, for example, with temporary (water) use bans (TUBs).

3G pitches

Utilisation of 3G provision across London and nationally is strategically important to accommodate training and competitive demand for sports including rugby (union and league), American football, lacrosse and particularly football. However, most London boroughs have an identified shortfall of provision, as shown in the following table. This evidences football-demand deficits utilising the FA training model (which suggests that there should be one full size 3G pitch for every 38 teams).

Table 4.3: 3G pitch shortfalls (where known)

Authority	No. of additional 3G pitches required
Barking & Dagenham	-
Barnet	4
Bexley	2
Brent	Unknown
Bromley	7
Camden	2
City of London	Unknown
Croydon	Unknown
Ealing	Unknown
Enfield	4
Greenwich	12
Hackney	4
Hammersmith & Fulham	1
Haringey	1
Harrow	2
Havering	6
Hillingdon	4
Hounslow	Unknown

Authority	No. of additional 3G pitches required
Islington	4
Kensington & Chelsea	Unknown
Kingston-upon-Thames	6
Lambeth	5
Lewisham	Unknown
Merton	Unknown
Newham	1.5
Redbridge	4
Richmond-upon-Thames	9
Southwark	5
Sutton	6.75
Tower Hamlets	Unknown
Waltham Forest	2
Wandsworth	Unknown
Westminster	6.75

Source: LFFPs and PPS findings (where complete and in-date)

To further showcase the importance of 3G provision, a recent London PPS study identified that, should use of existing 3G pitches be banned (linked to the DEFRA report – see below), it would require 205 additional grass football pitches to accommodate the demand that currently utilises 3G. This amounts to approximately 96 hectares of land and relates to just one authority and existing demand only (future demand would increase need).

Sports lighting

A number of London local authorities report facing issues in respect of the provision of sports lighting, particularly from a planning and environmental perspective. This most commonly relates to artificial pitches (e.g., 3G for football and sand-based for hockey), but can also relate to servicing grass pitches, particularly for rugby union where sports-lit grass provision is considered key for meeting training requirements. Sports lighting on hockey pitches (at appropriate lux levels) is essential to enable midweek evening training and can extend the periods during which matches can be played on key sites at weekends.

Planning permission is difficult to obtain for artificial pitches and sports lighting, and most boroughs have provision shortfalls. Inability to provide sports lighting is cited as a key reason why some provision is increasingly at risk. NGBs, including the FA, RFU and EH, specifically note this. The absence of lighting (or the prospects thereof) makes otherwise suitable sites harder to justify investing in. The consequence is often quality deterioration and lower demand (which can have a knock-on effect in respect of commercial viability/sustainability).

It is also influenced by the 'agent of change principle' in respect of the impact of new housing being installed adjacent to existing sports lit sites being used as leverage to reduce hours of (primarily evening) use because of claimed noise and light pollution.

Thuse, if/where a 3G pitch is delivered without sports lighting, it is not considered to make a significant contribution to addressing shortfalls as it does not enable year-round midweek evening usage. Such pitches can still be used for match play and, to a limited degree, help address grass pitch capacity shortfalls given that they offer greater daylight capacity to, for example, accommodate weekend 'back-to-back' matches.

(Sports lit) 3G pitch shortfalls

The FA training model notes that one full size 3G pitch is needed to meet the requirements of every 38 teams within a local authority (for training. Current shortfalls, where known, are shown below. All but one borough where this is known have an identified deficit.

DEFRA report - Option Appraisal for Intentionally Added Microplastics (May 2025)

Irrespective of the exact specification of 3G or successor surfaces they are clearly essential to the provision of pitch sport opportunity in London. Should the existing rubber crumb infill be outlawed, there will be a need for an alternative.

In September 2023, the European Commission adopted the EU Registration, Evaluation, Authorisation and Restriction of Chemicals restriction on sale of intentionally added microplastics, which includes rubber infill for 3G pitches. From that date, there is an eight-year transition before the new restriction comes into force and from October 2031 rubber crumb will no longer be purchasable in the EU.

Following the UK's exit from the EU, the regulatory framework for such matters is now, at UK level (apart from Northern Ireland) a matter for the Department for Environment, Food & Rural Affairs (DEFRA). It commissioned an evidence project to review emissions of intentionally added microplastics in the UK, including rubber infill and this is now informing future regulatory actions in Great Britain. Sport England has provided more information on the matter via its position statement on 3G pitches[11].

This project notes that artificial sports pitches are the main source of intentionally added microplastic pollution in the UK and estimates that artificial grass pitches microplastic emissions amount to 16,866 tonnes.

While the infill is the primary concern, the report also notes that plastic grass fibres make a significant contribution to pollution, citing research which indicates that up to 300 million fibres can be lost from a single pitch each year and that these eventually wash into drains, soils, wildlife settings, rivers and seas.

In summary, DEFRA's review advocated several key containment measures, but not an outright ban. Sport England noted the DEFRA report's containment option and considers it to be a responsible

11. Position statement on 3G pitches | Sport England

approach to prevent the migration of microplastics. Key RMO obligations for crumb rubber infill are that a reduction of more than 90% of microplastic emissions from sport surface infill materials is to be implemented by 2027. Measures are likely to include:

- Containment measures.
- Specific maintenance practices.
- Behaviour changes in relation to pitch maintenance, use and signage
- Installation of drains/filters to stop surface water transporting infill material away

More detail is included as Appendix 10 to this report

Equalities and access

Particularly following Covid-19, there is a growing body of evidence related to the benefits of accessing parks and green spaces. The Accessible Natural Greenspace Standard (ANGSt) recommends that everyone should have access to at least two hectares of green space no more than a five-minute walk from home. Nationally, the Green Space Index (GSI) shows that nearly 3million people still do not live within a ten-minute walk of green space. London's GSI score falls well below the minimum standard.

The net result of the pressure caused by the range of leagues, clubs and other user groups wishing to make use of facilities, facility scarcity and factors such as the increased cost of playing field hire means that there are reduced levels of available and/or affordable community access to existing playing field sites. This is undoubtedly exacerbated by the unequal spread of playing field provision across London, which places additional burdens on London boroughs/ local areas which do have provision and exacerbates the inequalities faced by certain groups in respect of accessing such facilities.

Equal Playing Field is a campaign calling for equal access to football facilities citing what it calls the unfair monopolisation of football pitches in London and the limited access given to women's and girl's teams. It is particularly critical of what it describes as the *'control that third-party companies exert over hundreds of schools and community pitches.'* It goes on to suggest that this has *'exacerbated what was already a deeply unequal playing field' pointing out that 'grassroots football, which has long been a vital space for community-building and inclusion, is now at risk of exclusion, overpricing, and exploitation.'*

The campaign group cites, based on its own research, that one pitch hire company which has booking rights over multiple spaces throughout London has repeatedly cancelled long-standing bookings in favour of men's leagues and that the same company increases the cost of pitch rentals to players by at least 30% an hour. In calling for equal access to football facilities, it suggests that key decision makers in the capital re-evaluate contracts with third-party companies to ensure fair, affordable access to public sports facilities. Its campaign is looking for prioritisation for grassroots women's teams, trans-inclusive clubs, and marginalised football communities when allocating space.

Ellie Vigors, founder of Enjoy FC (https://enjoyfc.uk/) notes that some women's clubs train next to football pitches to make use of lights provided for men's teams. She points out that *'unequal distribution of pitch space is stunting the growth of grassroots football for women and non-cisgender players and perpetuating huge inequities in the sport. There should be regulations and quotas in place so that teams who are on the pitches reflect the community.'*

Consultation for this report confirms that:

- Clubs and leagues in all sports and in many areas of London face difficulty obtaining affordable and secure access to playing fields.
- This problem is exacerbated when considering the needs of new clubs and community groups. Facility hirers (in all forms) are understandably keen to ensure that venues are let to bodies proven to be viable, that will maximise the use made of them and pay for them reliably.
- Many operators, including some London boroughs, have relatively fixed playing field hire arrangements. While this is clearly important in respect of the sustainability of regular users, the volume and quality of pitch stock in many areas is such that there is limited capacity to accommodate potential new community-based user groups or agencies which may be seeking more intermittent use.
- Overall, the cost of playing field use is rising and there is, among providers, more pressure to move to a full cost recovery position. Venue affordability i.e., determining what reasonable venue charges look like and the balance between affordability for the user and viability for providers is a key issue.
- The reduction/removal of existing subsidies already implemented by some London boroughs and planned by others is only likely to increase inequalities by pricing further user groups out.
- The cost of use of school sports facilities, where access is managed by external operators, is also high and rising. There is also little or no incentive for most of these operators to consider the relative value of the community/sports development provision offered by hirers.
- While a substantial proportion of playing field owners/operators (for example, London boroughs, Coram's Fields and the LPFF) offer discounted hire costs for training and match-play use by junior teams, there is little evidence to suggest that there is an orientation to encourage use/access by traditionally under-represented groups.
- A linked and arguably double-edged concern relates to the security of tenure enjoyed by key clubs/other agencies. For some, the uncertainty about and actual termination of existing access arrangements has created very substantial difficulties. For others, the pre-allocation of sites to long-established leagues and clubs is a clear impediment to development and growth.

Disability participation

In this section, the main focus is football, but it is recognised that other pitch sports also offer options for disabled (and older) people.

A range of adapted and specifically designed 'versions' of football are played across the UK and in London. These include, for example:

- Powerchair football.
- Blind and visually impaired football.
- Walking football.
- Amputee football.
- Cerebral palsy and frame football.
- Football for people with learning disabilities.
- Deaf and hearing impairment football.

All the county FAs with a presence in London already have programmes in place or have plans to create additional provision and opportunities for disabled football. Essex CFA, for example, has the stated ambitions to have some level of disability youth and adult provision in every local authority in its administrative area by the end of 2026/27. At present, the Amateur FA's primary focus in on adults although greater emphasis on provision for young people is anticipated going forward.

The Surrey FA pan disability Surrey Football for All League runs at several venues, some of which are outside Greater London in Surrey districts although activity is also accommodated at Goals soccer centres in Sutton, Wimbledon and Tolworth. The London FA has several pan-disability central venues and runs inclusive leagues across four divisions. Its impairment specific options include blind and wheelchair. There is also opportunity for mental health team referred outpatients in, for example, the SW London MH League which runs in Brixton, Tooting and Mitcham. A relatively high-profile inclusive festival to publicise disability football and highlight the venue is run every three months at Hackney Marshes. This offers lower hire charge rates and access.

Reportedly, several established 'mainstream' multi-team clubs are keen to deliver more activity for disabled people but are hamstrung by facility availability (alongside issues related to recruiting/retaining coaches and volunteers). Across London, the key challenges faced include, unsurprisingly, the competing demand for, and affordability of, access to 3G and grass pitch provision. It should also be noted that a significant proportion of what is provided/ sought does (or would if feasible) take place at indoor venues – notably sports halls.

The limited availability of playing spaces means that existing leagues can struggle to retain/ afford the facilities they presently use. Those looking to add more teams are often simply unable to secure access to the necessary space to sustain the larger number of matches the league would then cater for. It is also reported that the price of specialist league membership is rising alongside the increasing costs of pitch hire.

It has also been pointed out that new 3G pitch sites tend to be built without 'a disability lens'; new venues are technically accessible but not necessarily disability friendly. Some basic points were made about, for example, how to embed a range of accessibility options at new sites and/or when refurbishment takes place – a simple example quoted being simply (as standard) installing wheelchair friendly (wider) gates and audio signage.

Poverty and travelling to areas where there are more playing fields

There has, during consultation, been some discussion of the extent to which people resident in central London might travel to access playing fields which are more numerous and, in theory, offer more capacity and are more affordable - further out of central London. In addition to the fact that there is no evidence to suggest that access to playing fields is any less expensive as one travels from inner to outer London, this proposition is also arguably negated, certainly for people living in poverty, by cost of travel and related time consumption.

As is reported in the 4in10 The Lived Reality of Poverty in London (2021)[12], a substantial proportion of people noted the high cost of transport in London and find it challenging to move around on a budget. Participants in the extensive surveys and consultation undertaken for this report felt that they were missing out on things such as jobs, social interaction and education because of the cost incurred to get there. They point out that 'without money or access to transport, people can lose out on opportunities that otherwise might help them break out of the poverty cycle'.

The 2023 Social Market Foundation Getting the Measure of Transport Poverty report[13], while reporting that London has the lowest transport poverty in the country reports that it still affects more than 300,000 individuals (3.5% of the population). Key, in the context of this report, is what the Social Foundation describes as *accessibility poverty*. This is what occurs when certain households are unable to access key services – it makes use of gravity modelling to show the distance a person can (realistically) reach from their household.

The above is set alongside *mobility poverty*, which largely relates to affordable car ownership related to the other transport options people realistically have and *affordability poverty* for which the metrics track whether a population can afford the services available and how much transport to key services might cost.

In respect of access to playing field-based sport, affordability poverty usefully contextualises the issues faced when transport to a person or family's destination might be available (and reliable) but either it, or what it adds to the overall cost of participation, makes the overall cost too much to be considered affordable. If someone is seeking to train (say two times per week) and to play a match at a weekend, the cost could easily triple.

12. https://4in10.org.uk/wp-content/uploads/2021/10/flying-against-gravity.pdf

13. https://www.smf.co.uk/wp-content/uploads/2023/11/Getting-the-measure-of-transport-poverty-Nov-2023.pdf

All this said, public transport in London is more accessible than in any other region. In London, 28% of trips are made by public transport and journey times are 20% shorter than the national average even when accounting for other advantages including simplicity, frequency, reliability or fares.

In terms of equalities and the issues faced by people and families on low incomes, the solution, at least for the majority, does not appear to lie in the creation of participation, training and match play opportunity in outer London environments. These add cost, time consumption and other barriers such as perceived safety on public transport and in conducting the balance of any journey after dark - to the equation.

Catering for informal sport and physical activity

It is difficult to evaluate how consultation can effectively encompass informal sport, although anecdotal evidence emerging from the range of consultees included in this process would suggest that parks, playing fields, open access pitches, MUGAs (in their varying forms) and informal open spaces are all accommodating a degree of informal leisure and sport activities. They are a familiar feature of everyday urban life and public space, particularly in London. Furthermore, 'jumpers for goal posts' street football and street cricket can reportedly be self-directed, sometimes spontaneous, sometimes organised, sports practices.

Sport England's latest Active Lives Children and Young People Survey was released in December 2024. It notes that active play and informal activity (81%) are the most common forms of participation for children in school years 1-2 (ages 5-7) while engagement in team sports becomes more commonplace as they get older (57% of children in years 7-11 report taking part in a team sport at least once in the last week). It is also posited that the number of those participating in informal sport has risen alongside an accompanying increase in informal leisure activity – encompassing sports such as (including nationality-based variants) volleyball.

This trend is thought to reflect the development and diversification of informal sport and leisure formations. By definition, informal sport lacks consensus and evades precision. It is, perhaps best characterised as participation based on team, group or collective based physical activity but without (NGB recognised/affiliated) club structures, regulatory organisation, significant fees, formal membership and/or formal rules or referees.

It is also often reportedly reliant upon people and communities (geographic, ethnicity and interest-based) gaining open and casual access which enables individuals to join and engage largely on a 'turn up and play' basis. Activities may be ultra or micro local and neighbourhood based, some are ethnically bounded, others involve people with a range of ethnic backgrounds, and most are gendered in varied ways.

While, often spontaneous, informal sport tends to have loose organisational structures and networks, occurring in a particular space, and at a repeated time. This is exemplified by the fact that casual 'turn up and play' games and 'meetup' physical activities increasingly often have a digital underpinning in that they are sometimes arranged via mobile phone apps and on social media forums.

The key message is that, wherever possible, consideration should be given to whether and how informal participation is accommodated/ encouraged and how (and the extent to which) this can be orchestrated to enable formal (organised) and informal sport to utilise the facilities available without detriment in respect of condition or access.

Voluntary sector understanding and capacity

A regular KKP maxim is that 'demand is a function of supply.' It is arguable that this is more relevant in London than anywhere else in the UK. The absence, sudden or progressive loss, and the pricing out, of supply are all factors which need to be considered.

Mechanisms and support processes are needed to help clubs and leagues develop defensive capacity alongside delivering their core activities. This includes ensuring that community and sports partners understand the reasons why sites come under threat and the issues which impact upon the status of fields at risk.

Paraphrasing and adapting some of the commentary provided as part of consultation, it could be argued that the way in which facilities are used and defined should, in part, help to classify the extent to which they may be under threat:

- Community available, in good condition and well used (rarely come under threat although it does happen).
- Community available, in poor(er) condition and less well used – sites where relatively straightforward investment/intervention are likely to make a difference.
- Out of use (recent) – a high priority for action to both re-instate use (or maintain the pressure to do so) to ensure ongoing raised consciousness and proof of demand.
- Out of use (longer-term) - high priority for action in respect of both local focus and broader strategic attention - individual actions plans are likely to be needed.

It is worth noting that broader consultation confirms that, on occasions, preventing playing fields from coming under threat is not just about a broader defence for the facilities. The in-situ clubs, leagues and community organisations which use them are often, understandably, ill-equipped to marshal protection or to organise the sort of lobbying sometime needed to persuade key decision-makers to take notice.

More visible, better coordinated and promoted access to expert informed support in situations where access, tenure and, on occasions, club survival is threatened by loss, of access or changes of use affecting playing fields is also deemed to be necessary. This is linked to issues related to the capacity/expertise of community sport organisations to own/manage and maintain sites which might become available for asset transfer or purchase.

Cannibalisation

As some of the case studies included in this document illustrate, the 'cannibalisation' of sports facilities that serve one sport by another sport, or of community sports facilities by professional sports clubs resulting in a loss of community use, has been a relatively common feature.

It is also, on occasions, the case that installation of an artificial grass/3G pitch and associated infrastructure prevents or limits the capacity of the remainder of a site to continue to be used for other sports. This is, arguably, a particular issue for cricket but artificial pitch installation can also have an impact on, for example, drainage, ability to move/ rotate other grass pitches and the way in which adjacent partially lit grass spaces tend to be used by those waiting to play can also have a deleterious impact.

The growth, and local authority/commercial agency pursuit, of sites to accommodate sports/activities such as padel is also a consideration in this respect.

Such issues can also be further exacerbated where football clubs must add, specific amenities, and//or impose restrictions related to the level at which they compete in the Football Pyramid. An example of this is requiring a higher standard of 3G pitch surface that limits other forms of usage or needing to remove a 3G pitch entirely if the club progresses to the Football League (this has most recently happened at Bromley FC).



PART 5: LOCAL AUTHORITY AND SPORT-SPECIFIC ISSUES

This section has been primarily informed via the consultation process undertaken with local authorities and sport representatives (national and regional governing bodies).

Local authorities

Whilst London's local authorities have markedly different profiles and face differing problems, particularly given the varied nature of the boroughs, common themes recognised or identified during the consultation with council officers include:

- The increasing cost of pitch maintenance, particularly in light of reducing budgets. This is leading to reduced preservation, fewer repairs and lower quality. Increasing hire costs are being absorbed by user groups (which can reduce use and income and make sites less sustainable) or lead to them being taken out of commission.
- Worsening playing field quality, partly linked to aforementioned maintenance issues, but also a result of increased demand and resultant overuse. This is further exacerbated by the site loss and closure.
- Ancillary facility quality and the cost of improvements. Many sites, particularly those operated by boroughs, have poor quality changing rooms while budgets to improve provision are limited. The increased need for mixed gender access is an added consideration as part of this.
- PPS – some boroughs (mainly in inner London) that are without a current study see little value in undertaking one when they have very few playing field sites (despite exporting demand to neighbouring authorities. For boroughs with a PPS, many reference the resource difficulties faced actioning recommendations and in keeping studies up to date (or renewing them when required).
- Communication with schools. The increasing number of academies (and the approach taken by some private schools) in several authorities has led to reduced control, less access, low security of tenure and increased hire costs. Community use agreements are in place in some instances, but these are not always adhered to.
- A lack of control over current/former private/corporate/commercial/industry sites. Several of these have closed over recent years, often with little or no warning.
- Planning issues, especially related to providing artificial surfaces and sports lighting – this is particularly prominent in inner London and authorities closer to the River Thames.
- Increasing environmental considerations and the positive and negative impact that playing field sites have on this – alongside the issue of microplastic pollution from artificial turf pitch surfaces.
- Loss of expertise. Related to budget cuts, several boroughs no longer have the expertise and knowledge to adequately manage their playing field stock. 'Sport' and 'leisure' departments are shrinking or disappearing completely. This can also reduce the volume and quality of communication with Sport England and the relevant NGBs.

- Conflicting requirements within boroughs, due to the need to address housing demand and the propensity, in some areas, to seek to allocate playing field sites to meet this.
- Limited cross-boundary collaboration between boroughs even though demand regularly crosses borough boundaries. For a substantial number of boroughs (in particular those with limited playing field stock) there is a heavy reliance on provision in neighbouring authorities.
- Processes related to 'at risk' sites being flagged. Poor internal communication within councils can lead to knowledge about these issues not transferring effectively between all relevant departments. In some instances, officers in the boroughs concerned may not learn about the plans for such provision until applications are submitted.
- Insufficient communication with the GLA.

NGB – common themes

The full range of NGB comments is included as Appendix 11. This section summarises the common themes that apply across most if not all sports. Key observations include the:

- General, historical and continuing loss of playing field provision and the directly linked reduced level of access to playing fields (there are increasingly fewer sites).
- Increasing number of private operators taking sites out of use and leaving them to become overgrown.
- Increasing number of local authorities which no longer maintain sites as playing fields or are no longer marking out pitches for specific sports.
- Overuse of provision, linked to there being fewer accessible playing fields, despite ever growing demand.
- Insufficient number of artificial turf surfaced pitches which can cater for higher levels of demand and for multi-sport access.
- Planning difficulties related to creation of new artificial pitches, either linked to the pitches themselves or the necessity for sports lighting.
- Absence of sports lighting, at existing artificial grass pitch sites, which could, if addressed, substantially increase the capacity and useability of existing provision.
- Rise in maintenance costs and resultant increase in hire costs - that impacts on site access, usage, affordability and sustainability.
- Insufficient number/carrying capacity of grass pitches to accommodate demand for all aspects of the game and the overall reduction in playing field quality, commonly linked to more infrequent maintenance, overuse and drainage issues.
- Unavailability and/or the high and even deterrent costs of hiring playing fields from schools.
- Loss of/inability to secure grass pitch (in particular fine turf) knowledge and expertise.

- Lack of security of tenure at private, commercial and school sites where access is currently relied upon.
- Reluctance to consider and take forward the asset transfer of sites to clubs and/or community groups.
- (For sports with lower levels of demand) reliance on sites primarily allocated to, used by and in many instances managed by other ('main') pitch sports. This is exacerbated by, for example, seasonal overlaps.
- Poor and declining quality (or absence of) ancillary facilities (e.g., changing rooms) servicing pitches, with a particular issue around accessible and mixed gender usage.
- Increasing impact of environmental issues and the need for site users, owners and managers to be more responsive to this.
- Greater number and wider range of user groups competing for the use of available playing field space.
- Planning issues, particularly related to artificial surfaces and sports lighting requirements/ aspirations.
- Falling, and in some instances now lack, of knowledge, resource and finance within local authorities, linked to budget cuts.
- Insufficient number of boroughs with an up-to-date PPS in place, issues related to some not seeing the need for such a study and others not prioritising it or not having the resource to commission and/or recommission.



PART 6: KNOWN 'AT RISK' AND DERELICT SITES

Protection and processes to prevent loss of playing field sites

It is clear both from the consultation undertaken as part of this process and from the number of examples of sites under threat (see examples in accompanying database) that the level of protection for London's playing fields is proving to be insufficient. Several sites have been lost in recent years and, without change, the loss of further sites in the future is likely.

While it is not possible to empirically specifically identify the ownership type of site most at risk of loss it is clearly those purchased by parties with a stated intention to develop some or all of the site purchased irrespective of current or prior site designation which would appear to face the most imminent threat. The ownership/management of at-risk sites is set out as Table 6.3 later in this section

A key universal point is the limited collaboration between bodies committed to protect playing fields and support local groups to access (and/or fight to save) local sites.

As noted earlier, most boroughs face substantial pressures in respect of reducing budgets and finding space upon which to build to meet housing and meet other development targets. They are, in some instances, defenders/protectors of playing fields while in other locations/ situations, they look to their own stock to help deliver land acquisition/utilisation solutions.

In the form of the current (2021) London Plan, NPPF framework requirements, Sport England's protection role, borough plan policies and the interventions and advocacy of other agencies such as NGBs, the LPFF and CPRE London, there is some protection against loss and development. However, there is still:

- Loss of playing field provision even when the evidence base confirms the demand for it.
- Evidence of operators closing/mothballing sites, particularly where it is perceived that this can increase the chances of future development.
- An increased number of sites categorised "at risk of closure" alongside limited or belated awareness that such site(s) are at risk.
- Ongoing pressure on, and in some cases from London boroughs themselves to allow/ encourage development on existing playing field sites.
- Current and particularly former playing field sites of which key stakeholders are unaware (e.g., not listed on Sport England's Active Places) particularly in authorities without a PPS (or similar study) in place.

This is in part caused, and in part accompanied, by a decline in confidence in (and the ability to rely on) the planning system. This extends to Sport England's statutory role to protect playing fields and the fact that loss can still occur despite valid objections. There can also be a lack of call in from the National Casework Unit.

There is a strong possibility that this role will be further weakened should the government's consultation proposal to remove some agencies (including Sport England) from the list of statutory planning consultees be carried through.

As noted elsewhere, systems to signal, and address issues associated with at risk sites are limited in scope and highly dependent upon clubs, community groups, NGBs at county or national level, London boroughs or other agencies providing the information. An "at risk" register has been created as part of this study; however, it is recognised that this will be far from complete and largely dependent upon existing knowledge and detail furnished by key stakeholders, PPS processes and additional research.

The main key stakeholders which have provided information in relation to at risk sites are noted below, prior to the presentation of the register that has been established. Other sources of information utilised to inform this process included, for example, the website based: https://www.derelictlondon.com/derelict-london-sportsgrounds

Sport England

Both collectively and individually, Sport England planning officers responsible for London have a good level of knowledge about at-risk sites and are actively involved in trying to protect playing field provision/ensure the best outcomes. Regular meetings are held with pitch sport NGBs where existing and potential new at-risk sites are discussed/highlighted.

In specific relation to NGB perspectives, it should be referenced that while some consider a site to be at risk for their sport, this does not necessarily mean that it is at risk for sport in general. An example of this might be where a cricket club uses a site owned/operated by a football club and there being no guarantee that cricket activity will be able to continue but no overall concern about the venue's overall ongoing status as a playing field. Another common example is sand-dressed artificial turf pitches which formerly catered for hockey transitioning to 3G – meaning a loss for hockey but a potential gain for football and other sports.

Local authorities

Local authorities with an up-to-date PPS (or similar) in place should have their at-risk sites recognised as part of this process. A good quality PPS adds an extra layer of protection as recommendations are made in relation to the provision and the likely need for protection (or mitigated in line with NPPF requirements). Additional at-risk sites may also be recognised/ established as part of borough local plan processes, with some allocated for development whether they are in-use or disused. (Local plans should also set parameters around what is required for the development of playing field land to be supported, aligned to the NPPF).

In local authorities without a PPS, identifying at risk sites is more difficult. Consultation with borough officers was used to determine (where known) the presence of any such sites and their current status.

London Playing Fields Foundation

The LPFF has been promoting the notion of and has maintained an (albeit now dated) fields at risk register for some time. Consultation would suggest that it is, for some partners and stakeholders, one route via which information of this type is likely to be generated. It should, thus, be consulted/included in processes related to this both *per se* and as a consequence of its contribution to this report.

It is also important to ensure that the expertise, local knowledge and range of contacts that LPFF has in/about London is utilised to inform and contribute to protection work undertaken in this sphere. As and when a London database is created (aligned to some of the clearer pitch definitions cited in this report) it is considered that the LPFF will be an important partner in respect of any actions taken and processes adopted.

CPRE (London)

CPRE campaigns to protect green belt and green spaces. It has made a useful contribution to this work and provided supplementary detail about at-risk provision, albeit that a significant proportion of this overlaps that supplied by Sport England, NGBs and the LPFF.

Its 2022 campaign highlights unused and at-risk playing field sites with a view to bringing them back into use. This points out that multiple pitches, parks and green spaces across London have been fenced off and run down by their owners in the hope that they will be able to gain planning permission to build on them.

One stated concern is the absence of ways (other than compulsory purchase) to force landowners to do this. It notes that the lack of a clear identity (and function) makes such sites vulnerable to exploitation by developers and looks to proactively identify sports fields which have just fallen out of use or been deliberately taken out of use in lieu of assisting local groups to campaign to get them back.

Known 'at risk' sites

Undertaking this assignment has extended awareness of at-risk facilities. Whilst it started with c.12 sites, 36 are now identified as at risk. This extension resulted from research and consultation with key stakeholders, updating and correcting core Active Places information, a review of PPS projects where in place or in development and a concerted effort to provide this information following the London Playing Pitch Group meeting on 4 December 2025.

In terms of site identification, it is important to reference the fact noted elsewhere in this report, that a relatively small proportion of London boroughs currently have an up-to-date PPS (and underpinning needs assessment). A number are presently in development (albeit by the time some these become 'live' others may become outdated). It is considered highly likely that the number of known at risk sites will be higher as and when some of the 'in development' strategies progress (e.g., in Brent, where the PPS has only just commenced). The 36 are mapped out in the figure over, with further detail provided in Table 6.3.

Figure 6.1: Known at-risk sites in London

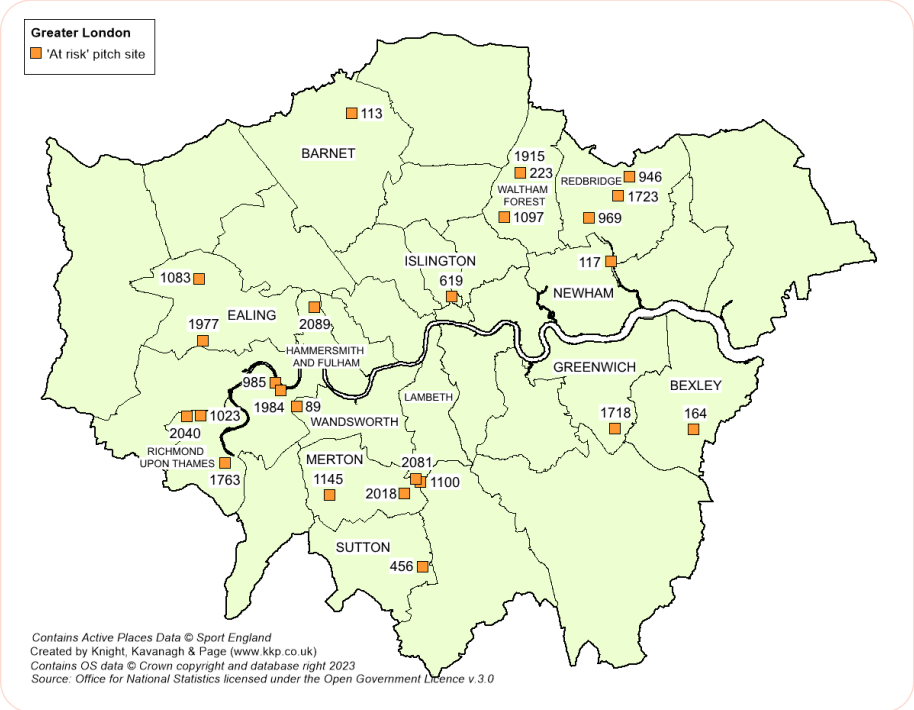


Table 6.1: Known at risk sites

Site name	London borough
Bank of England Sports Centre (closed)	Wandsworth
Barnet Playing Fields	Barnet
Barrington Playing Fields	Newham
Bexley Cricket Club	Bexley
Britannia Playing Fields	Waltham Forest
Croygas Sports Club	Sutton
Finsbury Leisure Centre	Islington
Jack Carter Pavilion Sports Ground	Redbridge
Kearly and Tonge (closed)	Redbridge
Kew Riverside Pitches	Richmond-upon-Thames
Kneller Hall School	Richmond-upon-Thames
Low Hall Sports Ground	Waltham Forest
Lucozade Powerleague Soccer Centre (Norbury) (closed)	Merton
Messines Playing Fields	Merton
St Ivor Grove Sports Club	Greenwich

Site name	London borough
Stratford Newtown Sports Club (closed)	Redbridge
Teddington Sports Ground (Udney Park Playing Fields)	Richmond-upon-Thames
Tyne Acre Playing Fields (closed)	Waltham Forest
Warren Farm Sports Centre (closed)	Ealing
Watney's Sports Ground (Stag Brewery)	Richmond-upon-Thames
Westminster City School Sports Ground (closed)	Merton
Whitewebbs Sports Centre (closed)	Enfield
Whitton Park Sports Association Ground	Richmond-upon-Thames
Woodmansterne Playing Fields	Lambeth
Wormwood Scrubs Park	Hammersmith and Fulham
Old Lyonians Sports Ground	Harrow
Cegas Sports Ground	Bromley
Barclays Sports Ground	Ealing
Willow Playing Field	Greenwich
The Bowring Group Sports Field	Greenwich
David Lloyds Grounds	Greenwich
Leigh Road Sports Ground	Newham
Queensmead Recreation Ground	Bromley
Ford Sports & Social Club (Newbury Park)	Redbridge
Old Parkonians	Redbridge
Leyton Stadium	Waltham Forest

(It is important to note that some sites have more than one title).

To showcase the extent to which the delivery of a needs assessment and playing pitch strategy helps to further highlight and pinpoint issues related to at-risk sites, the table overleaf explores the number of such sites identified by authority and whether that authority has a PPS in place or in development.

As is clearly illustrated, those with an up-to-date PPS generally identify a higher number of at-risk sites whilst several without one have no known at risk sites (ten of the 15 authorities with no at risk sites identified are without a 'live' PPS).

Table 6.2: At risk sites by authority

London borough	Known at risk sites	PPS status[14]
Barking & Dagenham	-	In development
Barnet	1	Adopted 2022
Bexley	1	In development
Brent	-	In development
Bromley	2	In development
Camden	-	No PPS
City of London	-	No PPS
Croydon	-	Out of date
Ealing	1	Adopted 2022[15]
Enfield	2	Out of date
Greenwich	4	In development
Hackney	-	In development
Hammersmith & Fulham	1	In development
Haringey	-	Out of date
Harrow	1	Adopted 2024
Havering	-	In development
Hillingdon	-	Out of date
Hounslow	-	In development
Islington	1	Out of date
Kensington & Chelsea	-	No PPS
Kingston-upon-Thames	-	Adopted 2023
Lambeth	1	In development
Lewisham	-	Out of date
Merton	3	In development
Newham	2	Adopted 2024
Redbridge	5	In development
Richmond-upon-Thames	5	Adopted 2023
Southwark	-	Out of date
Sutton	1	In development
Tower Hamlets	-	No PPS
Waltham Forest	4	In development
Wandsworth	1	Adopted 2024
Westminster	-	In development

14. As of March 2026.

15. Updated annually.

Notwithstanding the above, it should be reiterated that the authorities without a PPS are generally those with fewer playing fields. As such, some of these may be less prone to having at-risk sites, meaning that lack of identification is a true reflection of there being no such provision (at least in certain cases). Some authorities without a PPS (such as Islington, Enfield and Bexley) have at-risk sites which were identified via other means. This would appear to indicate that the absence of a PPS, while unhelpful, does not necessarily mean that there is a complete information void in the authority(s) concerned.

Nevertheless, given that the number of known at risk sites would almost certainly rise if all authorities had relevant up-to-date studies in place, it confirms how much more accurate (and useful) the above data would be, were supply audits (key components of playing fields needs assessments) regularly undertaken.

As is noted elsewhere in this report, the value of the PPS process would be further multiplied were needs assessments specified in the same manner and delivered to cover the same range of sports/amenities. This could then be updated by all London boroughs via regular cycles. At present, while several authorities have useable PPS studies, most follow different scopes (e.g., sports covered), adoption dates and methodologies (although all broadly follow Sport England's guidance).

The ability to monitor and update the at risk sites would also be assisted if authorities undertake the Stage E process set out within Sport England's PPS Guidance. Currently, only Richmond-upon-Thames is known to do this.

Common themes

Of the 36 identified at risk sites, some specific and consistent problems are evident – the first is site ownership. In total, 12 (33%) are operated by local authorities. This is a high percentage when taking account of the fact that most sites elsewhere in England (and in the other home nations) which come under threat are more commonly private/commercially owned. (This applies to 13 of the 36 across London). The fact that nine are sports club/community sites and two are operated by schools illustrates that all general forms of site ownership are vulnerable and that there are not necessarily any common themes in this respect.

Table 6.3: Ownership/management of at-risk sites

Site name	London borough	Ownership/ management
Bank of England Sports Centre (closed)	Wandsworth	Commercial
Barnet Playing Fields	Barnet	Local authority
Barrington Playing Fields	Newham	Local authority
Bexley Cricket Club	Bexley	Commercial
Britannia Playing Fields	Waltham Forest	Local authority
Croygas Sports Club	Sutton	Commercial
Finsbury Leisure Centre	Islington	Local authority
Jack Carter Pavilion Sports Ground	Redbridge	Local authority
Kearly and Tonge (closed)	Redbridge	Industry (for employees)
Kew Riverside Pitches	Richmond-upon-Thames	Community school
Kneller Hall School	Richmond-upon-Thames	MoD
Low Hall Sports Ground	Waltham Forest	Local authority
Lucozade Powerleague Soccer Centre (Norbury) (closed)	Merton	Commercial
Messines Playing Fields	Merton	Local authority
St Ivor Grove Sports Club	Greenwich	Sports club
Stratford Newtown Sports Club (closed)	Redbridge	Community organisation
Teddington Sports Ground (Udney Park Playing Fields)	Richmond-upon-Thames	Private
Tyne Acre Playing Fields (closed)	Waltham Forest	Local authority
Warren Farm Sports Centre (closed)	Ealing	Local authority
Watney's Sports Ground (Stag Brewery)	Richmond-upon-Thames	Sports club

Site name	London borough	Ownership/ management
Westminster City School Sports Ground (closed)	Merton	Academies
Whitewebbs Sports Centre (closed)	Enfield	Sports club
Whitton Park Sports Association Ground	Richmond-upon-Thames	Sports club
Woodmansterne Playing Fields	Lambeth	Local authority
Wormwood Scrubs Park	Hammersmith and Fulham	Local authority
Old Lyonians Sports Ground	Harrow	School
Cegas Sports Ground	Bromley	Private
Barclays Sports Ground	Ealing	Private
Willow Playing Field	Greenwich	Private
The Bowring Group Sports Field	Greenwich	Private
David Lloyd Kidbrooke	Greenwich	Private
Leigh Road Sports Ground	Newham	Private
Queensmead Recreation Ground	Bromley	Local authority
Ford Sports & Social Club (Newbury Park)	Redbridge	Sports club
Old Parkonians	Redbridge	Sports club
Leyton Stadium	Waltham Forest	Sports club

A specific at risk example further linked to ownership is what is thought to be the former Metropolitan Police Sports Ground, believed to be largely situated in Barnet. It has had several titles including Stirling Corner Sports Ground and by 1955 was reportedly known as the Finsbury Memorial Sports Centre. This 32-acre site was owned by the Metropolitan Police but is thought to have closed in the 1980s and is now heavily overgrown. In this instance, it is suggested that ownership is investigated to determine whether legal covenants or other protections might either enable (or limit the extent to which) it could be brought back into use for sport.

Similarly, other sites referenced as coming under threat (although not all interested parties necessarily share the same view) to enable the development of housing include:

- The now (25 April 2025) withdrawn plans to develop housing on the site of *the Finsbury Leisure Centre* (3G) playing pitches in Islington. The borough had applied to build tower blocks and to 'reprovision' some of the pitch space on the roof of a planned new leisure centre).

While this site does not meet the legal definition of a playing field (as no pitch onsite is greater than 0.2 hectares) it is in an authority which has a very low level of playing space provision of any type and only one public full-sized grass pitch. Were this to have gone ahead, it would have substantively reduced the scale of pitch provision and arguably ended any options for informal use.

- *Barkingside (Stratford Newtown Wesleyan) Sports Ground* - this has been out of use for a long period, and the owners have applied for planning permission to build housing. An active petition is looking to have the site brought back to use as a sports ground.

In a considerable number of instances, at-risk sites were deliberately taken out of use by their owners, seemingly seeking to landbank them and sell for 'hope value'. Others have reportedly just fallen out of use at points in or since the 1960s/1970s and left doing nothing since. Examples reportedly include:

- Two large pitches *adjacent to the Kingfisher Sports Ground* (Waltham Forest).
- Leigh Road Sports Ground (Newham) which would be lost (or reinstated as parkland) as part of a proposal to develop a new Edgelands Park and build houses on part of the site.
- *Barrington Playing Fields* (Newham) – although there is a proposal to restore/re-open the whole venue, parts of which have been closed to the community for an extended period (some pitches were reportedly last seen here in 2009). The Council owned site is presently reportedly overgrown and derelict and the plan is to create an outdoor sports and recreation centre which includes the existing gated/walled court and to convert the large grass area for use as a pitch for cricket and football.
- *Tooting Common* (Wandsworth) 'open access' redgra pitch – Council sponsored plans to replace this with an enclosed sports-lit 3G facility linked to the refurbishment of an on-site boxing club were refused at a planning inquiry. Work compliant with regulations for common land to refurbish the redgra pitch surface (extending its lifespan and ongoing use as a community asset) was scheduled to have commenced in late 2025.
- *Quaggy Playing Fields* – these (largely privately owned) playing fields are leased to local clubs in an area with apparently substantial demand. Several have, reportedly, been bought by developers, fenced off, closed to local clubs and left to become derelict. It is thought that several housing development applications have been submitted in recent years; one immediately adjacent (for Huntsman Field) has been successful.
- *Worsley Bridge (Segas Sports Ground)* – this planning application was submitted in 2022 after the site owners had ceased to allow access to it since 2016. It has reportedly been unused since 2014. It incorporated plans to build 95 homes in the form of three five-storey tower blocks (plus tennis courts and a playground) on the 2.14ha playing field which is located on protected Metropolitan Open Land. The 2022 application which attracted 58 written objections) was refused by LB Bromley Council.

- *Former National Westminster Bank Sports Ground - Turle Road, Merton* - planning consent (submitted January 2025) is being sought for a housing-led masterplan on what is described as a 'derelict brownfield site'. An earlier permission (in 1997) was given for a mixed-use residential and sports scheme on part of what was then the larger private sportsground site. The residential element of this occurred. The former sports pitches and courts are overgrown and not usable in their current state, and the site has been fenced and made inaccessible at the request of the council. It is, however, protected in the Local Plan which states that it cannot be built on if it can be reasonably demonstrated that there is a viable sporting use – in 2022 the council decided that non-viability had not been proven. (This is one of the case studies included in this report).

On a more positive note, it is understood that, as of June 2025, Southwark Council has agreed Dulwich Hamlet's plan to build a new stadium and will secure community access to the new facilities, including crucially the pitch, via legal agreements. The informal pitch at Greendale Park was sold to developers to build a new stadium for Dulwich Hamlet FC on that part of the park the original consent for this development (a new 4,000-capacity ground) having been granted in July 2020.

There are also instances where professional clubs have, or intend to take control of, reconfigure and, at best delimit and at worst end access to those venues as community sports facilities. These include the Oakfield Sports Ground in Redbridge and Barnet Playing Fields in Barnet. Both are featured in the case studies section within this report.

Dormant and derelict sites

As noted in the executive summary, there would be value in London Sport (with other partners) commissioning a specific study to assess known and unearth additional presently unused and derelict playing field sites. Given lessons learnt from the case studies and consultation, sites can have been taken out of active use as playing fields for an extended period by developers and others looking to cash in on their 'hope' value. Because of this, an extended timeframe, possibly up to 30 years of non-use should be allowed.

This should assess factors such as site ownership (and owner aspirations), exact dimensions, access, condition, current level of protection and related covenants, former uses and other factors. In turn, it should assist to build understanding of their potential to be brought back into use and, possibly, become one of the proposed strategic key sites for full-size 3G (or successor surface), hockey-surfaced and grass pitches for football, cricket and other sports.

This may also be an opportunity to get key 'under threat' playing field sites designated as assets of community value (ACVs) further enhancing the level of protection. For smaller 'at risk' sites, where it is determined that the provision can be brought back into use, asset transfer to appropriate clubs, community groups or trusts could be explored. This could assist in generating investment into improving sites whilst also meeting more localised needs.

PART 7: CASE STUDIES – KEY LEARNING POINTS

The four main case studies in this report (set out in full in Appendix 8) feature sites that have been under threat which have either been successfully protected or lost to the community as a consequence of housing development or professional club-based expansion. Key points of note drawn from these case studies and the other at-risk sites include the following.

Developers' strength relative to those seeking to protect

- Whether a proposed facility loss is being driven by a commercial entity looking to develop housing or other premises, is a professional club or is a local authority backed by or working with one of these, they almost always have deeper pockets than those lining up to protect provision.
- The pressure faced by boroughs to meet housing targets and related factors such as the cost of purchasing privately owned land looks likely to lead to the number of local authority supported proposals to develop land presently designated as playing field provision rising.
- In two of the case studies and other examples cited, it is common for playing field land to have been closed for a considerable period and to have passed through the hands of several owners – for its 'hope value.' Some sites cited as part of this study have had two, three or more housing developers and their agents attempt to secure changes of use to allow housing.
- In general, developer appears to be rewarded for obfuscation by eventually being able to claim that public access to facilities which are closed for an extended period are too run down and dilapidated to be brought back into use and are, thus 'redundant'. There is a need for clearer GLA and individual borough policy statements to prevent this method of reward for extended site closure and for allowing both pitch and ancillary facilities to deteriorate to a point where the 'uneconomic' argument can be made.
- In the case of former company sports grounds, some local authorities appear to have given credence to developer claims that site had 'never been open to the public', were 'private facilities for the sole use of employees' and that this amounts to 'no loss of a sporting facility'. It is very important, particularly in lieu of retaining existing and reclaiming derelict sites that such arguments are, in both policy and practical terms, comprehensively rebuffed.

Where facilities have been successfully defended

Key factors tend to include:

- A well led and informed, highly committed local group (or more than one group) often set up specifically for this sole purpose.
- Concerted, well-managed and widely backed campaigns which secure active (and vocal) support from Sport England, NGBs, agencies such as the LPFF or CPRE London, elected members, sports clubs and local community.

- The scale, professionalism, perseverance and number of bodies supporting the protection process – including securing the backing of high-profile individuals via whom additional publicity can be generated.
- Petitions – whether local or parliamentary appear to have influenced political judgements in respect of planning consents. In the example of Oakfield an 11,000+ signature petition and a threat of legal action also helped make the case for protection.
- Wholesale collective opposition. In the example of Oakfield, this included the FA, ECB, Essex CFA, the AFA, Sport England, Essex CCC, the LPFF, CPRE London and Redbridge Sports Centre. Sports agencies working together really can make a big difference.
- In a couple of instances, London Plan policies in respect of the protection of playing fields, were specifically noted by the planning inspector as having been a factor in the protection decisions made. This makes maintaining them at least at the current level in the new London Plan - very important.
- Having the expertise to effectively counter arguments related to the economic benefits of a development (e.g., job creation, supply chain benefits etc.) versus the harm caused by loss of community access to playing fields and green space.

Prevention and early notice

- There is a need for a coordinated 'early warning system' so that opposition to what are often very well-funded attempts by developers to secure planning consents to build upon community playing fields can be well-marshalled and well-funded to gain traction by securing the full weight of public option and high volumes of objections.
- Such a process to (say) Sport England, London Sport, the LPFF and/or relevant NGBs in respect of any agency looking to 'offload' playing pitch sites would enable those seeking to protect specific facilities to be better prepared and able to engage with other interested parties and marshal their arguments. In the case of Udney Park, Imperial College appears to simply have sold the venue to the highest bidder and the absence of prior dialogue with sporting bodies meant that rearguard rather than proactive action was taken.
- There is a need to find a concerted way to ensure (or create pressure so) that developers cannot simply allow what quickly become former sports facilities to decline to the point where they are declared uneconomic. There is merit in the notion of creating some form of fund to enable the purchase or establishment of long-term lease for sites subject to this form of action to make purchase based on their hope value (and subject to long-term legal actions) substantially less attractive.

PART 8: DETAILED RECOMMENDATIONS

Advocacy

Advocacy per se – it is necessary to do more to persuade all parties of the value/importance of the GLA, London boroughs, London Sport, Parks for London and other key agencies adopting a (more) strategic approach to the protection of playing fields. In addition to reinforcing the physical/mental health and community benefits these bodies plus other partners including Sport England, NGBs and community bodies should:

- Make a concerted effort to raise awareness among agencies with an interest in/ influence over playing field retention/development (including, for example, the Sport & Recreation Alliance and the London Marathon Trust) about how playing fields contribute to and enhance people's lives (physical and mental health and wellbeing etc.) – and of the need to continue to invest in existing playing pitch stock.
- Improve policy guidance and ensure that the new London Plan at least maintains current levels of protection of London's playing fields.
- Use the full range of promotional mechanisms to ensure that use (and associated issues e.g., carrying capacity, sports lighting, ancillary facilities, booking options, price, parking, ease of access, affordability, promotion of existing facilities etc.) all optimise the way in which existing playing fields are utilised and enhance related participation levels.
- Provide guidance about actions that leagues, clubs, community groups and other interested agencies can take to resist playing field loss for commercial/ residential/ other development and initiate/ drive restoration.
- Provide guidance on getting key sites designated as assets of community value (ACVs).
- Maintain a watching brief in respect of the *Community Right to Buy* legislation being introduced in England as part of the English Devolution and Community Empowerment Bill (announced July 2025). This will, in its present form, give community groups the first opportunity to purchase a local asset (which includes 'community space' encompassing a new sporting category) when it comes up for sale. It allows more time to raise the necessary funds and to prevent said spaces from being sold for other purposes.
- Share good practice (e.g.) about where/how threatened sites are 'saved.'

Advocacy processes – make the case for playing field protection/ development, preferably with the support of high profile committed political advocates - by:

- Setting out why/how key London agencies should collaborate to determine existing/future playing field-based need and agree universal core processes to protect them.

- Creating an effective platform/agency/system (held/managed/commissioned by London Sport) to (e.g.)
  - Optimise collective influence and maximise potential to influence playing field protection (and development) factors.
  - Enhance cross-agency communication and proactive information sharing, to ensure that threats of playing field loss are detected and acted upon as early as possible.
  - Improve the level of strategic and practical collaboration between NGBs in London via adoption of a jointly endorsed strategic approach to facility protection and improvement.
  - Based on this cross-agency communication (and learning from the work of the LPFF and CPRE) build on the concept of an 'early warning system' *(risk register)* to identify and update 'at risk' venues.
- Ensuring that all London boroughs have playing pitch needs assessments/strategies in place (see below).
- Collaborative development of cross-sport/open space options to ensure that all reasons to preserve, where possible expand and optimise use of playing field provision – are cited.

Given the particular concern that without its input, the rigour of playing field facility protection in London might be severely limited, if the government does remove Sport England from its national list of statutory consultees, making a specific case to retain its statutory role in the planning system *in London*.

In a dialogue (led by Parks for London) discuss challenges faced in respect of pitches located on open park (and certain school) sites where playing field quality is often compromised by informal and casual play. This should cover issues such as overall venue security, protection from vandalism and, for example, the secure storage of matchday equipment. Consideration should be given to extending the remit and 'membership' of the current London Pitch Sports Group and giving it a specific role in respect of oversight of certain of the actions recommended in this report.

The new London Plan

The consensus among other interested parties is that policy and messaging related to playing fields in the new London Plan should, at the very least, be as strong as they are in the current iteration.

Borough local plans

London boroughs should specify and achieve timely PPS (or PPOSS) delivery within local plans (so that they are in place prior to finalisation). They should also include community use of schools playing fields policies in local plans. For example, in relation to school polices, the Lambeth Local Plan 2020–2035, Section 2: Evidence Base and Issues includes the following statement:

"Community, play and youth facilities, libraries, and meeting spaces are…an essential part of the social infrastructure required by neighbourhoods… The (borough's) secondary and primary school programmes are seeking to enhance the facilities available to community users, with all recent new school sites and buildings being designed for use by the community out of school hours…and future developments will also carry this requirement".

Similarly, the Southwark Local Plan (2019-2036), under the Education places heading, sets out its policy committing to (in summary) ensure that:

- Each (school) development that takes place in Southwark…takes the opportunity for education facilities to provide facilities for sports, leisure, culture and for events so that we can maximise opportunities for active, healthy lifestyles.
- Education facilities are made available for use by all members of the community when they are not needed by the education establishment, for example, out of school hours…to encourage community interaction and active, healthy lifestyles.

Playing fields needs assessments/strategies and data

To ensure that the information needed to effectively protect (inform those seeking to protect) playing fields in London is available, an accurate, up-to-date evidence base is required to support advocacy and ensure that all key agencies are well positioned to 'make the case.'

Underpinning the above will be review of existing London PPS studies, developing an updated audit/database covering existing playing fields – utilising GIS mapping and accompanied by advice on development of frameworks/protocols to drive all-agency consistency of data collection, storage and analysis.

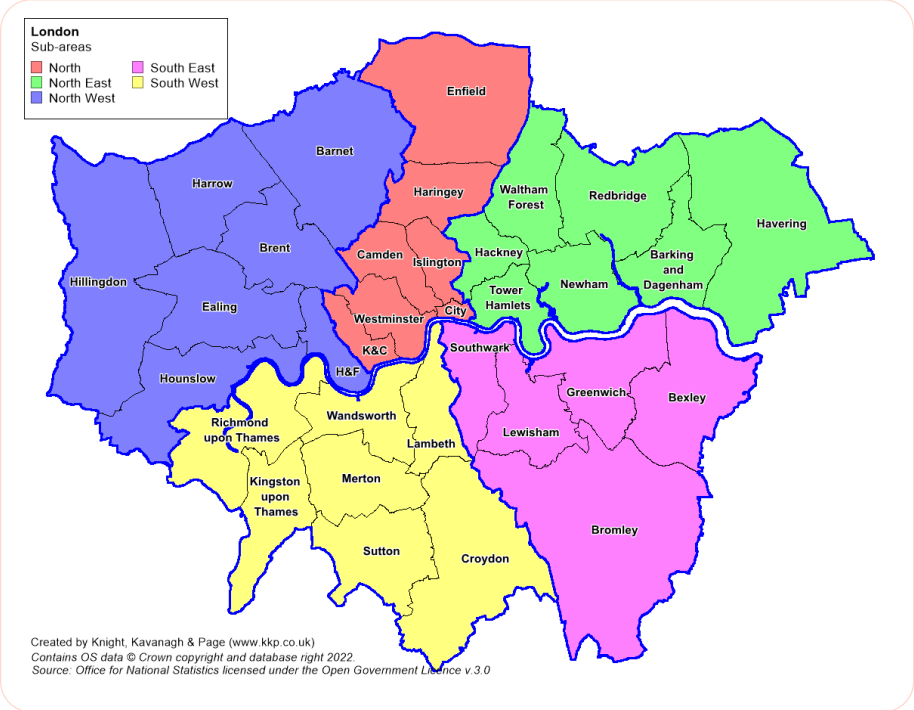
This should enable the running of key scenarios to test the impact of site loss/reduction (and conversely the positive value of new site development and/or existing site improvement).

The current London Plan makes the point that need for playing field provision should be assessed at local and sub-regional level. This is endorsed by NGBs and other consultees. It is recommended that, as advocated/mandated by the London Plan, boroughs collaborate to ensure that all parts of the capital are covered by individually or jointly commissioned playing field needs assessments/strategies – options include:

- Doing this on the basis of a pan-London PPS or at least needs assessment (possibly delivered in three cyclical annual tranches of c. 10-12 boroughs per tranche).

- Alternatively, commission pre-set combinations of London boroughs, covering agreed segments, with boroughs doing this jointly (see below).

Figure 8.1: Example grouping – project consultation 'clusters'



- A further alternative might be to commission pre-set (smaller) expanded London Pitch Sports Group encouraged borough combinations; authorities which are already sharing services, those adjacent to each other with comparably limited provision (e.g. Islington, Kensington & Chelsea and Westminster) or segments of London which relate to the 'jurisdictions of the county FAs/county cricket boards.

Whichever process is taken forward, or if London boroughs continue to commission needs assessments/strategies individually as occurs at present, London Sport, London Councils, Sport England, boroughs themselves and, as applicable the GLA (plus other involved agencies) should:

- Require/request that all authorities (or combinations thereof) which commission PPS studies do so based on a comparable brief (enabling consistency whilst also enabling local nuancing) covering the same range of sporting/recreational amenities.
- Require/request that all boroughs which commission PPS studies collect and store data on a secure central 'London database', held/managed by/on behalf of (say) London Sport to ensure that capacity exists to keep track of developments in supply/demand as well as, for example, 'at risk', lost or even new/upgraded sites. (Said data to be gathered in pre-agreed formats to ensure compatibility and enable ongoing verification).

- Via collective London Sport/NGB collaboration, progressively improve the depth and quality of demand information and the extent of cross-borough and/or inner to outer London migration – aligned to greater detail about the modes of travel people employ when going to and from training and matches.
- Working with/through an expanded London Pitch Sports Group and, in particular with Sport England, NGBs and the Football Foundation, ensure that London boroughs with very limited playing field provision but which, it can legitimately be assumed, export a high proportion of their demand are included in/covered by these commissions and play their full part in their delivery (many of the authorities with no existing PPS studies are London boroughs with limited playing pitch supply).
- Ensure that where PPS studies are delivered, they translate into the strongest possible protection and improvement commitments in local plans.
- Ensure that where PPS studies are delivered, they are monitored in line with Sport England PPS Guidance expectations (Stage E).

This, potentially, merits engagement with, for example, specialist planners (working with developers) to consider how best needs assessment data is translated into local plan statements and strictures which optimise protection. Sport England will need to play a key role in this matter - which should be addressed with urgency given the possibility that its statutory consultee status may change. It could, for example, commence and be tested with London boroughs which have completed or are presently engaged in PPS production.

Strategy

It is recommended that the GLA and London Sport, in partnership with Sport England, work closely with London boroughs, key pitch sport NGBs and the Football Foundation - with a view to engendering a specific funding multi-sport commitment) look to develop a (say) 10-year strategy for London. This would, for example:

- Determine and assess the feasibility of developing strategic key sites for full-size 3G (or successor surface), hockey-surfaced and grass-based pitches for football and cricket (plus other sports as reasonable). Components of such sites to encompass factors such as scale and suitability of existing site location options, degrees of difficulty/cost in respect of alternative new/lapsed site alternatives, public transport accessibility etc.
- Look at using developer contributions, London mayor-led Community Infrastructure Levy funds etc. to match fund grant options offered by (e.g.) the Football Foundation (and other funders) which make 'above-standard' capital contributions to key schemes – in return, for implementation of effective operational mechanisms to allow whole community access.

- Investigate and actively consider partnering with entities such as the Harris Federation and other multi-secondary school academy trusts in respect of a specific schools' grass and artificial pitches investment, directly linked to operational management arrangements geared to ensuring that the most positive community/sports development use is made of these facilities. (See recommendation in education section below).
- Evaluate the feasibility, working with (say one or two) private schools presently considered to be effectively offering community use of playing fields (and other provision), to create a better definition of what good community access to playing field provision looks like. This should reference Sport England guidance and indicate the scale of occupancy, affordability and the nature of user clubs and groups against which to benchmark – which might more credibly validate schools' claim for charitable status. The ideal outcome would be easily utilised templates against which schools' staff, sports development officers, London Sport and consultants evaluate current and ongoing achievement in this regard.
- Ensure that all HEI sports facilities in London are comprehensively listed and mapped and initiate dialogue with the London HEI sector to ensure that if/when site status changes and an institution is considering disposal or change of use, London Sport and the relevant borough are first invited to the table to discuss future options. This might usefully be accompanied by creation of a fund to buy (or secure long leases on) such land and including it in the strategic discussion with NGBs and the Football Foundation referred to above.
- Linked to the above, investigate the potential for London Sport (or partner) to become the operating partner for schools in which investment is planned and made. (This could be done in lieu of this process eventually extending to management of indoor provision).
- With a particular focus on football and other sports which can make use of 3G surfaced pitches, consider options for multiple sports-lit pitch sites – at schools and existing unused and derelict sites (such as the former Metropolitan Police site). Reflecting the points made earlier in this section, the above could/should be predicated upon:
  - London boroughs individually/collectively ensuring that their up-to-date PPS information is available to and stored on the proposed London database.
  - Development of a secure London playing fields database (utilising/building upon the one built as part of this commission).
  - London Sport/other resource input-based priority to boroughs which commit to produce (and update) playing pitch needs assessments/strategies.
  - Instigating a review of Football Foundation rules in respect of London borough eligibility for funding via the Grass Pitch Maintenance Fund because (with just a single exception) there are no town and parish councils in London.

NGBs

As per the recommendation set out above, utilising London Sport's pan-London role and status, improve the level of strategic and practical collaboration between NGBs via adoption of a jointly endorsed strategic approach to facility protection and improvement. This could/ should be, or be aligned to, the function of an expanded London Pitch Sports Group as referred to above.

As part of it, NGBs and, where relevant their county bodies (particularly in sports such as football and cricket) should actively demonstrate and deliver a greater degree of collaboration in respect of playing pitch planning, use, co-ordination and investment, addressing for example:

- Season overlaps and the conflicts of use that occur.
- The retention of grass playing fields where they are either essential for certain sports (e.g., cricket) or highly preferable for the sports concerned.
- Striking a balance between development of 3G pitches on school sites and the retention/ improvement of hockey pitches. This could include considering the implications of the potential new FIFA/FIH dual sport surfaced pitch which (in theory) can cater for both football and hockey for sites where new artificial grass provision is being considered, for existing hockey pitch sites and 3G sites where carpets are nearing end of life.
- Schools' lettings approaches and the hire costs charged for schools' facilities, particularly where clubs from multiple sports are competing for the same booking slots.
- The skills deficit and problems related to the affordability of playing pitch, artificial turf pitch and fine turf maintenance.
- Being more insistent in respect of capital funding support when asking boroughs to develop and maintain up to date PPS needs assessments and strategies. Given that they are considered, by the FA/FF, to be critical baselines for development of local plans it would be legitimate to insist upon them being in place before considering funding schemes at any scale in those authorities.
- The need for collaborative work between London Sport, LPFF and other partners to create mechanisms and support processes to assist clubs and leagues develop 'defensive capacity' with regard to site protection. This could/should include ensuring that community and sports partners understand why sites come under threat and the issues which impact upon the status of fields at risk. This could include better coordinated and promoted access to expert informed support.
- The need for NGBs, London Sport and London boroughs to collaborate in respect of, in the right situations, build the capacity/expertise of community sport organisations to own/ manage and maintain sites which might become available for asset transfer or purchase.

State schools-based provision

It is proposed that work should be undertaken (led/commissioned by London Sport – applying experience gained via its existing work to promote community use of schools) in partnership with the Harris Foundation and other academy trust groups to assess innovative ways to make school playing fields affordably and equitably available to the community aligned to better long-term planning and capital investment. This could/should encompass:

- Specific work to establish a more standardised approach to community use to include.
  - Assessing the extent to which (if at all) the allocation of community use of school playing fields is linked to clear understanding of community need.
  - Assessing ways to practically manage/programme school playing field stock to better dovetail with what is happening at borough-based provision and, for example, the LPFF.
  - Working more closely with, for example, leagues, accredited clubs and specified community organisations to ensure that the community value of users/user groups is factored into programming processes and decision-making.
- Aligning this with a direct link to the abovementioned proposed ten-year Football Foundation investment strategy – ensuring that, in return for the adoption of best practice community use arrangements and their collaboration, for example, with PPS processes, schools are well placed to benefit from Foundation (and other i.e., developer contributions and CIL-based) capital investment in grass and artificial turf pitches.
- Ensuring that, where community use agreements are put into place, particularly when linked to investment and planning processes, they are monitored and adhered to.
- Ensuring that pricing policies do not prohibit community use while still enabling schools to adequately maintain their provision via income.
- Considering the possible impact of Sport England losing its statutory consultation status on schools' propensity to agree to and abide by binding community agreements.

The Harris Federation confirmed its willingness to be involved in and to work with other academy trust bodies in London to take such a process forward.

Independent school and university provision

London Sport and other partners should consider how best they can work with NGBs and organised leagues in key sports to determine whether more, regular, structured use of private school and university playing fields might be feasible and to look at how this might be centrally brokered and co-ordinated. As part of this, further dialogue may be required, particularly with establishments that have implemented a successful and wide-ranging community use programme (e.g., to establish a 'best practice' model).

At risk, dormant and derelict sites

London Sport, in tandem with other partners, should commission a specific study to assess known, and unearth additional presently unused and derelict playing field sites. Given the lessons espoused in the case studies, whereby it is clear that certain sites can have been taken out of active use as playing fields for an extended period by developers and others looking to cash in on their 'hope' value, an extended timeframe of possibly up to (say) 30 years of non-use should be allowed.

This should assess factors such as site ownership (and owner aspirations), exact dimensions, access, condition, current level of protection and related covenants, former uses and other factors. In turn, this will assist in building an understanding in respect of their potential to be brought back into use and potentially to become one of the proposed strategically key sites for full-size 3G (or successor surface-based), hockey-surfaced and grass-based pitches for football, cricket and other sports.

This may also be an opportunity to get key 'under threat' playing field sites designated as assets of community value (ACVs) further enhancing the level of protection secured.

For smaller 'at risk' sites, where it is determined that the provision can be brought back into use, asset transfer to appropriate clubs, community groups or trusts could be explored. This could then assist in generating investment into improving the sites whilst also meeting more localised community needs.

Critical sites

A "critical site" list of existing sites should be maintained by London Sport and partners. This will be provision that requires protection and that could be a focus for action, based on priorities for the different playing pitch sports and considering local authority nuances.

Environmental factors

London Sport and partners should:

- Either directly or drawing upon the resource and expertise of other appropriate professional agencies in this sphere, provide guidance/education about the mechanisms that sport can take to address flooding/drought.
- Encourage/incentivise all playing fields providers and sports clubs to adopt advocated practices to optimise rainwater harvesting and other environmentally positive related processes such as the installation of ground source heat pumps
- Provide guidance/education about the role of artificial turf pitches accommodating usage levels to counter debate about their impact on the environment. A balanced approach between grass and artificial pitches is required.

- Continue to assess the latest guidance on 3G pitches in relation to rubber-crumb infill, ensure that suitable infill containment can be retrofitted and that all pitches have containment and recycling strategies in place.
- Provide education on the role of sports lighting, with latest technology limiting "light spillage" being less invasive (and increasingly so) to local communities.

Taking a different approach to artificial turf pitch development in London

Linked to the above, and taking full account of the fact that the installation of artificial grass and/or 3G pitches will not suit every sport or location, London Sport, Sport England and NGBs should evaluate the extent to which it may be feasible to advocate for an officially more flexible London-specific approach to full-sized artificial turf pitch development on new sites and/or at existing grass pitch venues. This should extend to direct dialogue with county football associations, other NGBs and the Football Foundation about the hubs programme to create financially sustainable grassroots sports facilities with multiple 3G and grass pitches.

This could/should be accompanied by work with agencies such as the Sports and Play Construction Association (SAPCA) and the FF to consider how the design, fencing formats, and sport lighting arrangement and spillage might most positively accompany and enhance other site and park features to make artificial turf a more complementary replacement for single/multiple grass pitches.

Consideration should also be given to the simpler ways in which playing field capacity might be extended which include, for example, installing, improving and/or extending the hours for which playing fields (in particular artificial turf pitches and tennis courts etc.) offer sports lighting. This can ensure that they are open and available for sufficient hours to both offer genuine capacity and help make venues economically viable. However, this may engender changes in local policy, improved mechanisms to reduce noise levels, better designed sports lighting to mitigate/reduce spillage and better related landscaping.

London Sport role

London Sport should gear its own resources to be more proactively involved in coordination of playing field protection and use in London and make more and better use of the support potentially available from agencies such as Sport England, Parks for London, the LPFF and CPRE (London).

This report sets out some of the principal areas in which London Sport should be more proactively involved but in summary they include:

- Working closely with Sport England planners and aligned to the operation of the Active Environments frameworks, encouraging/ driving and, as necessary assisting London boroughs to (where possible jointly and collaboratively) commission PPS studies – and to actively share the (consistent) data generated on a London database (either managed by London Sport or an agency it commissions).
- Collaborating with partners to create update and work on playing field protection/ development options highlighted by an at-risk site register (this should be a key feature of the database hosted).
- Commissioning a specific study to, in the first instance, look to identify as many unused, derelict and at-risk playing field sites as possible and then to determine the potential opportunities they present accompanied by risk evaluation related to site ownership, hope value, flood plain status and, ultimately, capital and revenue cost estimates related to venue purchase, renewal and ongoing management.
- Commission (building on the initial consultation with the Harris Foundation) specific work to look at improving levels of regular, secure, affordable community access to (and potential management mechanisms for) state schools playing fields if necessary, taking on (or commissioning) a brokering and orchestration role in this process.
- Commission (as relevant jointly) specific work to look at improving levels of regular, secure, affordable community access to the playing field facilities owned by independent schools and higher education premises if necessary, taking on (or commissioning) a brokering and orchestration role in this process.
- Optimising its more central role and the learning/findings/ recommendation of the abovementioned projects and processes, work proactively with the Football Foundation and other NGBs to develop a long-term development (multi-sport) capital investment strategy for London.
- Looking at how it can work more effectively with (in particular well-resourced) NGBs and partners such as Sported to develop mechanisms and support processes to help clubs, leagues community and sports partners to acquire knowledge and understanding about how and why sites come under threat, how casual/informal use can be better accommodated and who to contact when seeking support to protect their right of access to an existing venue or gain access to unused or under-utilised facilities. (This should include guidance on processes which will help such groups spot and prevent early actions in respect of prospective site closures).

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