

Clive Efford MP

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Mr Peter Kozak
3/26, Hawk Wing
The Planning Inspectorate
Temple Quay House
2 The Square,
Temple Quay
Bristol BS1 6PN

09 October 2015

Dear Mr Kozack,

Plans for the development of the Gaelic Athletic Association Sports Ground and 134 Avery Hill Road Eltham SE9

Pin Ref: APP/E53301W/15/3129768

Appellant's Name: Linden Ltd. and Novalong Ltd

1. I am writing to express my opposition to the appeal lodged by Linden Ltd and Novalong Ltd (henceforth referred to as the developers) against a decision taken by Greenwich Council to deny them permission to build residential units on the former GAA ground in Avery Hill Road.
2. I am writing as the Member of Parliament for Eltham, a position I have held since 1997. Prior to that I was an elected councillor for the old Well Hall ward in Greenwich Borough. I am also the current Shadow Minister for Sport.
3. For many years I have been involved in the campaign with local residents to preserve the former GAA site – designated as Community Open Space – as a sports ground. The Council has consistently refused permission over many years for this site to be developed in the way the developers want.
4. The developers propose to redevelop the sports field and construct 136 residential units of up to three storeys height with associated access, parking, publicly accessible open space and landscaping.
5. This is a completely unacceptable proposal which if allowed will have severe long-term repercussions for the future of sports fields in this part of London. Such sites are vital to building happy and healthy communities.
6. The GAA sports ground has cast a blight over other sites in the Eltham area for too long. It has remained derelict for more than 22 years. During this time no serious attempt has been made by the owners to market the site for use as a sports facility. It has been common knowledge since it was first vacated, that the owners want to maximise the value of the land and sell it for profit. I believe that during this time there have been at least 10 planning applications to build on the site. These were all refused by Greenwich Planning for reasons relating to the loss of a

private sports ground and recreational facilities which would set an undesirable precedent and be detrimental to the open character of New Eltham

7. At the same time as the developers made their planning application for the GAA site they also applied for permission to develop the Bardhill sports field in New Eltham with a community building and sports pitches. Like the GAA ground, Bardhill has been kept derelict and there is little evidence that the owners have attempted to market it as a sports facility.
8. It is not acceptable for the developers to effectively hold the Bardhill site as a ransom, cynically offering to bring the site into use only if they are given permission to develop the GAA site. Both Bardhill and the GAA site are important local amenities and both should be preserved and returned to use as sports fields as soon as possible.
9. You will no doubt be aware that a former application which was turned down by the Council was the subject of a public inquiry in 2007 by the Planning Inspector.
10. Although the Inspector found in favour of the developers the appeal was eventually turned down by the Parliamentary Under Secretary of State at Communities and Local Government. One of the reasons the minister gave for refusing the appeal was that she was not satisfied that the owners had properly marketed the site as a sports ground.
11. I gave oral evidence to the Inquiry and was delighted that the government listened to the views of local residents on this matter. I stressed to the Inspector that allowing the site to be built on would set a terrible precedent for the remaining sports grounds in the local area which play such an important role in the Borough.
12. Following that decision I underlined how vital it was for the owners of the site to market the site and look for sports clubs to use the ground. Unfortunately they failed to take that advice and the site has remained derelict, despite several local sports clubs expressing an interest in taking the site over to use it for its intended sports use.
13. I am enclosing a copy of a letter I sent to John Healey the then Minister of State in March 2010 giving the details of a very serious bid made at that time to restore the site for sporting use. The owners of the site refused even to respond to the many approaches that were made to them. I wrote to the Minister to put this matter on record, so that in the event that the owners brought forward another proposal to build on the site, they would not be able to claim the sports field is not needed because there is no one who wishes to use it for sporting purposes.
14. In what I believe was a cynical attempt to make their case appear more acceptable, the developers last year underwent a marketing exercise supposedly to offer the site for sale as a sports facility. However, the price they offered the site at – £750,000 – was far in excess of its true value. When the ground was valued in 2009 by Drivers Jonas the figure given was £375,000 meaning that the site's value, according to the developers, has doubled in just five years.
15. Fields in Trust – the national charity which seeks to protect sports grounds to ensure that everyone has access to free, local outdoor space for sport, play and recreation – say that “*this value takes the value well beyond recreational land values.*”
16. Despite this, a sports club – the Greenwich Borough Football Club (GBFC) – did offer to purchase the site. The club – currently having to share Dartford FC's ground – has been wanting to move back to the Borough for some time and has been looking for a suitable venue in Greenwich.

17. They made a detailed and thorough application in May this year for planning permission to install two floodlit full-size 3G football pitches on the site. The club's proposals also included car parking and changing facilities, a cafe and recreation area. An additional boundary to the existing residential properties is proposed in the form of an earth mound.
18. This is precisely the sort of development that I and the local residents would like to see on the site. It is in line with Council policy and would be an important local community resource.
19. After GBFC made their application I organised a public meeting so that local residents could come and hear more details of the Club's proposals. Over a hundred people turned up to listen to people from the Club set out their plans. In a show of hands at the end of the meeting there was an almost unanimous support of the scheme.
20. However, the GAA and the developers decided not to accept GBFC's bid. This underlines my opinion that their attempt to sell the site was not genuine and when GBFC effectively called their bluff they were forced to reveal their true intentions by refusing to sell the site.
21. It is clear then, that if permission is granted to build on this land, it would send a green light to developers across London and elsewhere to allow Community Open Spaces such as sports grounds to become derelict. Developers could be confident that eventually they would be given permission to develop the site, increasing its value exponentially.
22. Other sites in the area have been the subject of applications for development over many years. There have been numerous proposals relating to another sports field in the area, the STC sports ground, including two attempts by Fairlight Commercial to relocate Wyborne Primary School to the STC site, in return for being allowed to build housing on part of the sports ground and on the site of the school. This situation can only get worse if this appeal is allowed and a precedent set.
23. The Royal Borough of Greenwich is rightly proud of its sporting heritage and for the key role it played in the 2012 Olympics. We have already seen many positive outcomes from the legacy of those Games. There are a lot of independent sports clubs located in Eltham that are host to not-for-profit organisations that offer the opportunity to participate in sport to people of all sections of the wider community. There is enormous demand for space for a wide range of activities. If we allow this development to go ahead then we will be seen to be letting down those organisations and undermining that legacy.
24. We have seen large population growth in this Borough which looks set to continue. This is already leading to an increase in demand for sporting facilities and this will only increase as the increases.
25. Much of this expansion is in the north of the borough where there is little opportunity to develop open space to accommodate the kind of sports facilities needed. This will lead to more demand on sites in areas like Eltham.
26. As you know, the GAA Ground is designated as Community Open Space in the Borough's Unitary Development Plan. The Council's own guidelines state that "*Public and private open space areas defined as Community Open Space on the Proposals Map will be safeguarded from built development. New buildings and extensions to existing buildings will only be permitted where they are ancillary to the existing land use, are limited in size and extent, sensitively sited, and are compatible with neighbouring development. Changes of use of existing buildings in ancillary use will be considered in the light of Policy 01. Where existing built development within parks and public open spaces becomes surplus to demand, the*

Council may allow the sites to be redeveloped for specialist sporting development (which combine the use of outdoor and indoor space), subject to the criteria set out in Policy 01.”

27. In July this year the Council produced its *Playing Pitch Strategy 2015-2028* which sought to provide the Council with a robust evidence base to underpin its planning policies for protecting, enhancing and providing new facilities over the Strategy period. In particular, the Strategy fully complies with Sport England Guidance on *‘How to undertake and apply Needs Assessments for Sport’* and the new methodology from its *‘Playing Pitch Strategy Guidance’*.
28. The report concludes: *“The main challenge facing the Royal Borough of Greenwich is providing sufficient high quality sports facilities to meet the needs of a rapidly growing population up to 2028. Whilst the quality of the existing sports facilities stock is relatively good, the Council will face challenges in maintaining this quality level whilst providing the additional facilities and participation opportunities required by a growing population. This Strategy sets out the priorities and actions up to 2028 which will enable the Council and a range of key partners to achieve this goal and continue to provide a high quality sports facility offer across Royal Greenwich for the benefit of all residents and visitors.”*
29. It seems clear if the site were allowed to be developed in the way the developers want it would run counter to the Council’s stated policies.
30. Although I have not seen the developers’ reasons for appeal, I am led to believe that it is based on non-determination. It is my understanding that the decision notice was issued just after the date agreed by the Council and the developers. The decision to refuse the planning application was taken by the full planning board made up of elected councillors. The developers should not be allowed to overturn a democratically-made local decision like this on a procedural issue just because a notice was issued shortly after the agreed date.
31. In conclusion, if this appeal is allowed then it would place planning policy completely out of step with the Council’s planning guidelines and local and national policies on social exclusions, getting more people active in sport and promoting healthy lifestyles.
32. For all these reasons I hope you will refuse this appeal, thereby protecting sports grounds across the Borough, and indeed the country, by refusing this appeal.
33. Thank you for taking the time to look into this matter.

Yours sincerely

Clive Efford MP