

Sadiq Khan (Mayor London)
New London Plan
GLA City Hall
London Plan Team
Post Point 18
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London SE1 2AA

2 March 2018

Dear Mayor

Representation on the draft London Plan

We act on behalf of AEG.

- 1 AEG is one of the leading sports and entertainment presenters in the world and is a wholly owned subsidiary of the Anschutz Company. With over 50 divisions, the AEG team works to create one-of-a-kind live entertainment experiences.
- 2 AEG facilities include over 100 of the world's state-of-the-art venues such as STAPLES Centre (Los Angeles, CA), Globe Arenas (Stockholm, Sweden), Mercedes-Benz Arena (Berlin, Germany) and the Barclaycard Arena (Hamburg, Germany), and The O2, London's home of entertainment.
- 3 AEG Live, the live entertainment division of AEG, is dedicated to all aspects of live contemporary music performance. AEG Live comprises touring, festival, exhibition, broadcast, merchandise and special event divisions. It owns, operates or exclusively books 35 state-of-the-art venues and produces the Barclaycard Presents British Summer Time festival in Hyde Park.
- 4 AEG took over the Millennium Dome in 2004, following the Millennium Exhibition and subsequent failed attempts to dispose of what had become a white elephant. Since 2007, when AEG reopened the dome as The O2, The O2 has attracted over 100 million visitors to the venue and played an active part in developing the wider area, investing directly in complementary real estate such as The Intercontinental Hotel and the Entertainment District / Designer Outlet Village, as well as acting as a catalyst for wider investment in the Greenwich Peninsula. This has only been possible because of our initial investment of £350m and the ongoing investment needed to sustain the content and growth of the site, which generates over £0.5bn in annual value to London, has created over 4,100 new jobs (with a further 1,500 jobs to be created with the opening, later this year, of the designer outlet village) and annual revenue to London businesses of c.£100m.
- 5 AEG welcomes the broad approach set out in the draft London Plan. It provides a proper focus on the role that culture, entertainment and the night time economy can play in making and maintaining London as a great city.
- 6 The Plan should, however, contain more specific policies about the approach that should be adopted to protect existing entertainment and cultural areas. It does this in relation to the Central Activities Zone (CAZ) but should also identify and provide a context for decision making for other areas outside Central London. The Plan should recognise more fully that cultural and entertainment venues of international importance are not limited to the CAZ. In particular the Plan should set a framework for making the strategic spatial decision about the preferred location(s) for major new investment. Both of these themes are developed below.

Setting a Cultural Context for London

- 7 There are two areas where the Plan needs to be developed further to make sure that full use is made of existing cultural and entertainment infrastructure, and to make sensible provision across London for the development of new facilities.

A New Cultural Quarter for Greenwich

- 8 AEG will be working with the Royal Borough of Greenwich, others involved in the regeneration of the Greenwich Peninsula, and the wider community to consolidate and build upon the changes that have been made to the area. Since 2004 AEG has committed significant capital and effort to delivering cultural assets on the Greenwich Peninsula – The O2 Arena, the Indigo Music Club, event spaces, major events and festivals, and exhibition spaces. This is complemented by the investment of others such as the Intercontinental Hotel, attracted by the success of The O2, who operate the UK's largest ballroom and host numerous events.
- 9 The aim is to designate The O2, other facilities on the Greenwich Peninsula and the wider attractions in and around Greenwich town centre as a Cultural Quarter. This reflects the recognition in paragraph 7.5.11 of the Draft London Plan of Greenwich Riverside and The O2 as a strategic cluster of cultural attractions. As suggested in the draft London Plan, the partnership will work to seek synergies with schools and higher educational establishments in the area. The London Plan should recognise the proposed Cultural Quarter.

Providing a Focus for Wembley

- 10 Wembley is continuing to develop as a leisure and cultural destination. It has a long history as a focus for football and sport, and the SSE Arena, Wembley (which is managed by AEG) offers a range of cultural events. The appeal of both Wembley Stadium and the Arena is being broadened, and Brent Council have aspirations for further change in the area.
- 11 Like Greenwich Riverside and The O2, Wembley Stadium and the SSE Arena are recognised in the London Plan as being one of London's strategic clusters of cultural attractions. AEG agrees with this and believes that the Plan should recognise the further contribution that Wembley could make to diversifying the location and enhancing the diversity of cultural facilities in this part of London. This would be consistent with, and would develop, Policy HC5 which notes the contribution that cultural investment can make in Opportunity Areas.

A Spatial Strategy for New Entertainment Provision in London

- 12 Entertainment is at the heart of the night time economy and a major contributor to London's economy. The new draft London Plan seeks to support cultural hotspots and to protect London's venues but we think it needs to go further.
- 13 The location of new entertainment venues is important. They need to be planned and sited where they complement rather than conflict with existing infrastructure. They should be located where they can, in tandem with existing facilities, enhance accessibility for both Londoners and those visiting London from outside. They should be used as an engine of growth and change, much in the way that the redevelopment of the Dome (as it was) acted as a landmark and catalyst for change on the Greenwich Peninsula.
- 14 Obviously, AEG is aware of the proposal by Madison Square Garden for a new arena at Stratford. AEG agrees that there would be benefits to the public if there are new venues in London, provided that they are in the right places. AEG is concerned that a new arena at Stratford will put excessive

pressure on the transport network and cause operational problems (both to The O2 and the wider development on the Greenwich Peninsula) and will fundamentally imbalance the location of major venues in London.

- 15 At the moment there is no adequate strategic policy framework for balancing the competing and significant demands of major facilities and Policy HC5 should be expanded to address this. One approach would be to develop a "cultural hierarchy" in the Plan that would, in time, take into account the future Cultural Quarters and would require the effects of new facilities on identified locations to be properly assessed. The supporting text around paragraph 7.5.10 would then be amplified to set out the factors that would need to be considered.
- 16 The London Plan should also set a strategy for additional major new venues in London, choosing the best location for a new venue. London as a whole should be concerned about ensuring that the benefits of such an investment are, as at Greenwich, harnessed to underpin regeneration. The O2 has acted as the anchor for the redevelopment of the Greenwich Peninsula which will deliver in excess of 15,000 residential units, together with retail floorspace, schools and green infrastructure. The location of the next major venue should be chosen to have a similar catalytic effect. As noted above, the draft London Plan mentions the benefits of major entertainment and cultural development and emphasises the contribution that can be made with new Cultural Quarters in Opportunity Areas, but it does not take the obvious next strategic step of looking at the most appropriate locations for new development.
- 17 The choice of the location for the next major venue in London, which is likely to be the only one for the next two decades, should be properly planned. The ability to strategically assess and plan the most appropriate location for a new venue should not be usurped by opportunistic planning applications.
- 18 As you might expect AEG has already considered a range of alternative sites in London. There are obvious candidates, including Earls Court and Old Oak Common, where the development of a new arena could easily be the catalyst for and support further development in the area. In the case of Old Oak Common, a new arena could be used to provide a vibrant heart to the emerging development, creating jobs, generating revenue to local businesses and attracting a broad range of people to an area at the moment little known to many Londoners.
- 19 AEG has prepared baseline information on potential arena opportunities around London, looking at key criteria including:
 - (a) land availability;
 - (b) capacity;
 - (c) connectivity; and
 - (d) spatial distribution.
- 20 AEG would be happy to share this information with the GLA. We would also be happy to host a workshop, jointly with RB Greenwich and with interested local authorities, on the benefits of a properly integrated new arena if it is properly planned, integrated and supported. Some of the lessons from the way in which the Greenwich Peninsula has been developed could help the GLA plan and manage the delivery of London's next arena..

Conclusion

- 21 The London Plan should designate Greenwich as a Cultural Quarter, should recognise the cultural/leisure component of Wembley and encourage that to be developed further, and should provide a framework for a pan-London decision-making process for identifying the best location, in planning terms, for the next major venue.

Yours faithfully