

# Carter Jonas comments

**Brentford Football Club (mdevlin@brentfordfc.co.uk)**

Page: [Policy S5 Sports and recreation facilities](#)

Section: [S5](#)

We are writing on behalf of Brentford Football Club, which currently plays its football in the English Football League Championship, with keen ambitions to play in The Premier League in the near future. The Club currently has its training ground located on Metropolitan Open Land in Osterley, and is in the process of exploring its options for improving and enhancing its facilities on the same site in the future.

In this regard, we are aware that representations have been made on behalf of Fulham Football Club with respect to Draft London Plan Policy S5 - Sports and Recreation Facilities, specifically with regard to elite performance sport, the very special circumstances surrounding it and Metropolitan Open Land.

Having reviewed the Draft London Plan and Policy S5 ourselves, we are now writing on behalf of Brentford Football Club to state our strong support for the representations made on behalf of Fulham Football Club, and would like to reiterate their comments again as follows:

*"London is home to numerous professional sporting teams and athletes across a wide variety of sports. These sports have both venues and training facilities throughout the Capital and contribute significantly to London's economy and reputation as a centre of sporting excellence. They also help to encourage take up and participation of sport and perform an important role in London's sporting eco-system."*

*The draft London Plan fails to acknowledge elite performance sport or provide any policy support for the protection of existing facilities or the need to improve and enhance facilities so as to ensure that professional sporting clubs, and the facilities that support them, can remain at the forefront of sporting excellence both nationally and internationally. As such, Policy 'S5 Sports and Recreational Facilities' fails to plan positively or strategically for elite sport and should be amended to include a new sub-category to the policy, which states:*

*"London is a centre of excellence for elite performance sports. The needs and requirements of elite performance sport differ from those of amateur and community sport and such differences should be acknowledged when considering development proposals. The London Plan supports the provision and enhancement of elite performance sports facilities to meet the needs of both Clubs and athletes to ensure that London maintains its position as a preeminent location for elite performance sport both nationally and internationally."*

*The adopted London Plan contains Policy 4.6 'Support for and enhancement of arts, culture, sports and entertainment' contained support for professional sporting enterprises. The draft London Plan does not include a similar policy to the detriment of elite performance sport. Policy S5 should be amended as outlined above to demonstrate London's support for sporting excellence and participation at all levels of sport.*

*By its nature London is constrained and green space limited. Elite performance team sports require large sites to accommodate the number of pitches/training areas required for training professional and development players while allowing for adequate pitch rotation to ensure the maintenance of quality playing surfaces. The evolution of professional sport over the last 20 years has also seen significant strides made in sports science and youth development. This means that elite performance team sports require different and more extensive facilities than are required by amateur and community sports or which were required by elite teams even 10 or 20 years ago. The London Plan fails to acknowledge the unique requirements of elite performance sport nor provide any support for these unique needs or requirements. It is considered that the London Plan fails to plan positively for the needs of elite performance sport and the evidence base has failed to consider the strategic needs of elite performance sports.*

*The nature and characteristics of London mean that a number of elite sport training facilities are located in the Green Belt or MOL. Policy S5 as worded fails to acknowledge this fact. The very special circumstances of elite performance sports should be acknowledged and specifically referenced in Policy S5 (C). A failure to do this would be a failure to plan positively for elite performance sport. This is particularly important in circumstances where Policy G3 'Metropolitan Open Land' fails to acknowledge circumstances where 'very special circumstances' may exist which would allow inappropriate development (see Paragraph 86 and 87). The aspiration to protect the MOL is supported but the policy as set out in both Policy S5 and G3 is unacceptable as it fails to acknowledge the very special circumstances of users of the MOL. Policy G3 as drafted needs to be amended to better reflect national policy and the particular circumstances of London. Failure to do so would be a failure to plan positively for elite performance sport."*

Page: [Policy G3 Metropolitan Open Land](#)

Section: [G3](#)

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