
From: 02 March 2018 15:43
Sent: Londonplan
To: DRAFT NEW LONDON PLAN
Subject:

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Dear Sir/Madam,

DRAFT NEW LONDON PLAN

On behalf of Crystal Palace Football Club Ltd, we welcome the opportunity of making these representations to the draft London Plan (2017). We believe that as a “*World-Class City*”, London requires a spatial planning policy that specifically protects and encourages the necessary enhancement of facilities required by major commercial sporting enterprises including, in particular, Premier League football and similar clubs. This is important given the very significant social and economic contributions they provide to the nation and its Capital City.

Policy HC5

The economic and social value of Premier League football, and other world-class sporting ventures, is enormously significant to the nation and the nation’s capital. In draft Policy HC5, spectator sporting enterprises are thus, correctly recognised as a key part of London’s “*rich cultural offer*” and that it is “*important for London’s cultural tourism*” including because of their acknowledged fundamental economic and social roles.

However, Policy HC5 does not then effectively plan for the significance of such professional sporting enterprises. Whilst London’s arts, culture and many entertainment facilities can be effectively clustered across “*cultural quarters*”, the Plan needs to advocate and provide a more responsive spatial planning strategy to accommodate the particular needs of Premier League and other commercial sporting enterprises in respect of both their spectator and performance facilities and their related essential training grounds.

To effectively respond to ever increasing levels of national and international competitiveness and success, professional spectator sports, and in particular Premier and other League football clubs, require extensive training grounds to accommodate the number of pitches and facilities required to prepare professional players for matches whilst, at the same time, nurturing emerging talent. The scale of space required has to accommodate the necessary pitch rotation to ensure the maintenance of top quality playing surfaces as well as provision for a wide range of related built and other infrastructure. The protection, enhancement and provision of such sites will not be compatible with a spatial vision that puts cultural facilities into neat dense “*cultural quarters*” in central London. There is a need for an additional spatial dimension bearing in mind the inevitable and essential use of large tracts of green space conveniently located to the relevant stadia. Accommodating the unique requirements of such elite professional sporting enterprises, in the context of the acknowledged benefits that they bring to London, inevitably creates “*very special circumstances*” in the context of how and where they are to be located.

We therefore request an addition to Policy HC5 that is worded as follows:

“Sites for spectator-intensive professional sporting enterprises and their related training facilities should be protected, enhanced and provided for in response to their recognised needs and requirements having regard to the resulting cultural, social and economic benefits that ensue. Where there is a need to locate new or enhanced training facilities on green space in order to accommodate their required scale, this may constitute a very special circumstance justifying the grant of planning permission.”

Policies G2 and G3

Regarding the policy on Green Belt (G2), we are concerned that the abbreviated wording of the policy as now proposed is inconsistent with national planning guidance. The wording of G2 (A) *“development proposals that would harm the Green Belt should be refused”* is inconsistent with NPPF paragraph 87, which states *“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”*.

We support the appropriate and pragmatic flexibility introduced within MOL Policy G3 that would, in appropriate circumstances, facilitate the positive reuse of existing MOL where other land might better serve such a MOL function. The same approach should be extended to relevant sites within the Green Belt, including where existing land fails to meet its defined purposes and/or fails to provide for appropriate or beneficial uses.

Kind regards
Martin Robeson

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