



**WILDSTONE
PLANNING**

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
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28th February 2018

// Draft New London Plan - Representations

Dear Sir/Madam

We write on behalf of Fulham Football Club (FFC) to make representations on the Draft New London Plan.

In addition to amateur and community sport, London is home to numerous professional and amateur sports, teams and athletes, which contribute to London's economy and reputation as a centre of sporting excellence. London's professional sports have venues and training facilities throughout the Capital in a wide variety of locations, which are required for these sports to operate and excel. Elite performance sport helps to encourage take up and participation in sport and performs an important role in London's sporting eco-system as it contributes venues, funding and expertise for amateur and community sports. As such, professional sport performs an important strategic role, which needs to be acknowledged and supported.

Unfortunately, the Draft New London Plan as drafted fails to acknowledge elite performance sport or provide any policy support for either the protection or need to improve and enhance facilities so as to ensure that professional sports, and the facilities that it needs, can remain at the forefront of sporting innovation and excellence both nationally and internationally. Policy 'S5 Sports and Recreational Facilities' fails to plan positively or strategically for elite performance sport and should be amended to include a new criterion dealing with elite performance sport as follows:

"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 sports, Clubs and athletes to ensure that London maintains its position as a pre-eminent location for elite performance sport both nationally and internationally."

Policy 4.6 'Support for and enhancement of arts, culture, sports and entertainment' of the adopted London Plan sought to support professional sport as well as amateur and community sport. There is no logical reason or justification why the Draft New London Plan

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does not contain a similar policy. The omission of such a policy is to the detriment of elite performance sport.

Elite performance team sports require large sites to accommodate the number of pitches/training areas required for training of professional and development teams 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, which now necessitates significant built facilities to support the training elite performance athletes. This has led to a further divergence between the facilities required for elite performance sports and those required for amateur and community sports. The London Plan fails to acknowledge or support the specific and unique requirements of elite performance sport. It is considered that the London Plan fails to plan positively or strategically for elite performance sport and the evidence base has failed to consider the strategic needs of elite performance sports in terms of either venues or training facilities. In addition to amending Policy S5 there should be a specific policy similar to Policy 4.6 of the adopted London Plan that strategically supports elite performance sport.

By its nature London is constrained and green space limited. This inevitably means that the training facilities for a number of elite performance team sports are located in the Green Belt or Metropolitan Open Land (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 or strategically 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 of the National Planning Policy Framework (NPPF)). 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 certain land uses within the MOL or be consistent with the policy approach in the NPPF with respect to Green Belt. The Draft New London Plan fails to justify a divergence in approach to policy

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 or strategically for elite performance sport.

I would be grateful if you could confirm receipt of these representations and I look forward to the GLA's response to the important strategic issues that have been raised. In the meantime, should you require any additional clarification or information please do not hesitate to contact me.

Yours faithfully

Philip Allard
Director

c.c.	Justine Simons	Deputy Mayor
	Simon Cooper	Sport Manager
	Darren Preston	FFC