

# Richmond Upon Thames Local Plan Examination 2017

## Hearing 4 – Site Allocations: SA11, Twickenham Stadium

### Representations on behalf of the Rugby Football Union (RFU)

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**Inspector’s Question: “SA11 – is the allocation justified adequately and should it reference clearly the approach to growth of facilities at the site?”**

#### **Justification**

The RFU supports the site allocation policy for the Twickenham Stadium overall. However, to ensure the Plan is 'positively prepared' and 'consistent with the NPPF' the policy should provide more support for the continued use and growth (not simply improvement) of the Stadium, to ensure it remains an international stadium with the facilities and services expected of it.

Twickenham Stadium is owned by the RFU and has been the national stadium for the England rugby team for over 100 years. The site comprises the 82,000 seat stadium, and uses such as a hotel, banqueting and conference facilities, and a gymnasium. Over the past 25 years the RFU has gradually modernised the site to increase seating capacity, improve spectator comfort and meet modern safety requirements.

Stadiums, and their associated facilities and infrastructure, are used across the country for multiple purposes. These uses include sporting uses as well as concerts, events, conferences and other leisure uses. This diversity in the operation of stadiums contributes considerably to the economic and social role that the stadiums play within the local community and within the country.

London Plan Policy 4.6(h) states that when preparing LDFS, Boroughs should “*seek to enhance the economic contribution and community role of arts, cultural, professional sporting and entertainment facilities*”. The NPPF is clear at paragraph 19 that the Government is committed to ensuring the planning system does everything it can to support sustainable growth, and not act as an impediment. Further, paragraph 157 of the NPPF confirms that Local Plans should “*allocate sites to promote development and flexible use of land...*”.

Paragraph 152 of the NPPF requires that Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Paragraph 154 requires plans to be aspirational but realistic. They should address the spatial implications of economic, social and environmental change and should set out the opportunities for development and clear policies on what will or will not be permitted and where. Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate (157, NPPF).

Twickenham Stadium is a national stadium that provides a considerable opportunity for use for multiple purposes within the Borough. The economic and social benefits of the stadium within Twickenham should be recognised and supported. In this regard, Twickenham Stadium should have a supportive and positive policy within the Local Plan that recognises the distinct advantage that the national stadium facility provides both the Borough and the wider London and south-east area.

Therefore, in accordance with both the NPPF and London Plan, a Site Allocation specific to Twickenham Stadium is fully justified and appropriate. In respect of the supporting text, we consider that this is ‘adequate’, but it could provide more explanation as to why ‘support for the continued use of the Stadium’ and associated uses is given – including the justification outlined above.

It is noted that the Council is seeking a policy that helps to respond to circumstances where parts of the site become surplus to requirements. In this scenario, the policy should not be so restrictive. Overall, it is

considered that the policy and justification text provides a clear indication of how a decision maker should react to a development proposal at the Stadium.

## **Growth**

Further, in line with the above, the site allocation policy should clearly recognise the importance of growth of facilities at the site, so as to encourage sustainable economic growth within the Borough and south-east.

The Council should be using this opportunity with the production of the Local Plan to state within the site allocation policy that they will support appropriate additional facilities on the site, including complimentary commercial uses, in accordance with the requirements of national and London planning policy. This would ensure a 'positively prepared' Plan confirming that the Council supports the national stadium within their Borough for sports, leisure, recreational uses and complimentary commercial uses. This will help to plan for positive growth of the facility which, in turn, will support the local economy.

As currently drafted we do not consider that the site allocation policy goes far enough in supporting the growth of the Stadium. In addition, the Council's response to RFU representations submitted to the Local Plan Public Version state that *"The Council will require any proposals and additional uses to be complementary to the main use of the site as a sports ground"*. This is an impediment to the sustainable growth of the stadium, and therefore contrary to the NPPF.

## **Proposed Change**

The justification text at point four states that *"A mixed use scheme, with residential including affordable housing, may also be considered appropriate provided that..."*. The wider site is suitable for mixed-use, including potential residential uses. However, it is not necessary for the policy to seek mixed-use AND residential within a redevelopment scenario, as the appropriate range of mixed-use should be considered and agreed at the application stage.

The suitability of residential elements will depend on the location and the type of use being proposed, and the timing in which the land becomes surplus to requirements. In this regard, we disagree with the Council's published response to the RFU representations whereby they state *"In addition, residential uses are generally not considered 'complementary' to the main use of the site as an international stadium and sporting venue"*. Residential uses are successfully developed immediately adjacent to a number of stadia across the UK, including both Arsenal and Wembley Stadium in London and, therefore, RFU disagree that residential uses are not appropriate around stadia.

In accordance with NPPF Paragraph 7 and 8 we therefore request that the site allocation policy is amended to:

*"The Council supports the continued use and ~~improvement~~ growth of the grounds for sports, recreation and leisure uses. Appropriate additional facilities including ~~a new east and north~~ reconfiguration of the stands, indoor leisure, hotel or business uses, as well as hospitality and conference facilities, ~~may~~ will be supported provided that they are complementary to the main use of the site as a sports ground, concerts and events stadium. Residential and/or mixed use developments would also be acceptable.*

We request that the forth bullet point within the justification text is amended to state:

*"There is a general need for new office floorspace in the borough and in the event of an area of the site being declared surplus to requirements, the opportunity to provide for employment floorspace, such as offices or a business park, should be firstly explored. A mixed use or residential scheme, ~~with residential including affordable housing~~, may also be considered appropriate provided that other sporting and associated uses, including employment, have been fully investigated and that the mixed /residential use is compatible with the main use of the site, i.e. a national stadium, also taking into account the presence of the existing sewerage treatment works to the north of the site and residential amenity".*

We trust that our comments will be taken into consideration by the Inspector in advance of the Hearing.