

London Borough of Richmond upon Thames – Local Plan Examination 2017

Statement of Common Ground – London Borough of Richmond upon Thames and Rugby Football Union (RFU)

The Rugby Football Union (RFU), in their Further Statement dated September 2017, made a number of comments and suggested modifications in relation to Twickenham Stadium (Site Allocation SA 11).

This Statement of Common Ground sets out the areas of agreement between the London Borough of Richmond upon Thames and the RFU, and proposes resulting minor changes and/or modifications to the Publication Local Plan as submitted for independent examination in public. The Inspector is asked to consider these minor changes / modifications, which are acceptable to and have been agreed by both parties.


In addition, Appendix 1 sets out a Statement of Fact on matters not agreed between LBRuT and RFU.


Text proposed to be inserted in **bold underlined**

Text proposed to be removed in ~~red strikethrough~~

Policy / Section / paragraph	RFU Representation	LBRuT Response	Reason for Change	Common Ground Agreed?
SA 11 – Additional facilities (main policy text)	The following change is sought: “Appropriate additional facilities including a new east and north <u>reconfiguration</u> of the stands, indoor leisure, hotel or business uses...”	The Council is amenable to this change and it is acknowledged that this would provide RFU with more flexibility about additional facilities on the site to take account of changing needs during the Plan period. Agreed to amend as follows: “Appropriate additional facilities including a new east and north <u>reconfiguration</u> of the stands, indoor leisure, hotel or business uses...”	To allow for flexibility in considering additional facilities on the site.	Agreed

Both parties consider that the above amendment addresses some of the concerns raised by the RFU in their representations and their Further Statement on the London Borough of Richmond upon Thames – Local Plan Examination 2017

Signed on Behalf of the London Borough of Richmond upon Thames		
Name and Position	Signature	Date
Andrea Kitzberger-Smith Policy and Design Team Manager London Borough of Richmond upon Thames		11 October 2017

Signed on Behalf of the Rugby Football Union		
Name and Position	Signature	Date
Simon Slatford Senior Director Lichfields on behalf of the Rugby Football Union		11 October 2017

Appendix 1 – Statement of Fact on matters not agreed between RFU and LBRuT

Policy / Section / paragraph	RFU Representation (Regulation 19 and Further Statement)	LBRuT Response
SA 11 – Growth of facilities (main policy text)	<p>SA 11 should clearly recognise the importance of growth of facilities at the site by supporting appropriate additional facilities, including complimentary commercial uses, in accordance with the requirements of national and London planning policy.</p> <p>As currently drafted we do not consider that the site allocation policy goes far enough in supporting the growth of the Stadium.</p> <p>The following change is sought: “The Council supports the continued use and improvement growth of the grounds for sports uses...”</p>	<p>The Council considers that by inclusion of the second sentence of the main policy text, which specifically refers to additional facilities, some growth on the site is supported. It is therefore not considered necessary to change the word ‘improvement’ to ‘growth’, particularly as permission for a new east stand has been granted recently.</p> <p>In addition, it should be noted that that the site is constrained by nearby residential neighbourhoods, one of the country’s largest sewerage treatment works to the north, and the eastern part of the site is designated MOL. Whilst the Council would like to proactively work with the landowner, to date there have been no discussions on a wider Masterplan or Strategy for Growth on this site. Therefore, a specific reference to ‘growth’ is considered premature and inappropriate.</p>
SA 11 – Diversity of uses (main policy text)	<p>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. Requiring any proposals and additional uses to be complementary to the main use of the site as a sports ground is an impediment to the sustainable growth of the stadium.</p> <p>The following changes are sought: “The Council supports the continued use and improvement growth of the grounds for <u>both physical structures and diversity of operations (eg for non-sporting purposes such as concerts, events and other leisure uses).</u> Appropriate additional facilities including a new east and</p>	<p>The Council does not agree with the proposed change as non-sporting events and over-intensification of uses can lead to significant local impacts. The main use of the site is a sporting stadium, and whilst it is acknowledged that the stadium building itself already includes a mix of uses, such as hotel, gym, museum, hospitality / conference suites, offices and rugby store, many of these uses are operated by the RFU (i.e. the museum, store, hospitality and offices) and are therefore ancillary uses via condition or Section 106 restriction.</p> <p>It should also be noted that the site has permanent consent for holding 3 summer concerts per annum, whereby the maximum number of spectators is limited to 55,000 per concert.</p> <p>Whilst some applications for non-sporting uses and events have been accepted in the past, others, such as a change of use to allow for a Pavarotti Concert have been refused due to “<i>an unacceptable level of disturbance and inconvenience to residents of the area by way of congestion, traffic levels, general activity and noise resulting from the</i></p>

	<p>north reconfiguration and/or redevelopment 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.</p> <p><i>[It should be noted that the Pavarotti concert referenced by LBRuT was prior to 2001 and there have been a host of more recent concerts held. In particular, a U2 concert was held in summer 2017 and the number of complaints was minimal with an overall positive response locally].</i></p>	<p><i>coming and going of spectators and from the concert itself</i>". In addition, a temporary change of use application to allow for a Monster Jam event in 2016 was withdrawn by the applicant following advice by the Council that the application is unlikely to be supported by Planning Committee.</p> <p>The RFU is seeking particular reference to 'events' within the main text – it should be noted that 'events' are not in themselves a recognised land use; the use of the site is a sportsground, which can hold 3 summer concerts per annum.</p> <p>Overall, it is considered to be inappropriate for the Site Allocation to specifically support growth in the stadium's operation for multiple purposes and non-sporting events, particularly as no engagement or discussions have taken place in this regard with the Met Police (particularly their Counter Terrorism Command), Richmond's Community Safety Partnership, South Western Railways, Transport for London, the London Borough of Hounslow and Thames Water. It is therefore considered that the normal planning application process is sufficient for non-sporting events as it would allow for full consideration of all potential issues, for example, planning permission was required for the permanent consent to hold 3 concerts per annum.</p>
<p>SA 11 – residential uses (main policy text and bullet point 4)</p>	<p>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.</p> <p>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.</p>	<p>It is noted that the RFU is seeking a very flexibly worded policy but the proposed additional wording regarding residential uses could result in any forthcoming planning application not even to consider non-residential uses and the borough's local needs first. There is for example a need for new employment, particularly office, floorspace in the borough, and the RFU's proposed wording would not even allow for other uses to be addressed first prior to consider a residential scheme. The Council has already proposed a modification in this regard by amending the last sentence of bullet point 4 as follows: <i>"A mixed use scheme, with which may include residential including affordable housing, may also be considered appropriate provided that..."</i></p>

	<p>The following changes are sought:</p> <p>Add to main policy text at end: <u>Mixed use development, or residential, would also be acceptable.</u></p> <p>Amend bullet point 4 as follows: “A mixed use <u>or residential</u> scheme, with residential including affordable housing, may also be considered appropriate provided that other sporting and associated uses, including employment,...”</p>	<p>The supporting text, with the Council’s proposed amendment above, clarifies that the Council would also consider a mixed use scheme appropriate, which may include residential, provided that other sporting and associated uses have been explored first. This is considered to provide flexibility and effectiveness in implementation.</p> <p>The Council does not consider residential uses to be 'complementary' to the main use of the site as an international stadium and sporting venue. The other stadia referred to in the RFU’s Further Statement have been subject to complete redevelopment plans, and they have not retrospectively introduced residential uses within the site. It should be noted that the site is constrained by nearby residential neighbourhoods, and the eastern part of the site is designated MOL. To the north of the site is one of the country’s largest sewerage treatment facility, and Thames Water have previously raised concerns about adding further residential development to Twickenham Stadium, which could lead to impacts on operations of their site.</p>
<p>SA 11 – supporting text</p>	<p>Add to supporting text: <u>“All proposals at the grounds will be subject to being fully assessed and considered against other Local Plan Policies with particular regard to highway and residential amenity impacts.”</u></p>	<p>Whilst this change may be acceptable, the Council considers that it is not necessary to include references to the fact that all proposals will be assessed and considered against other Local Plan policies. The assumption is that all policies within the Local Plan and any other relevant adopted planning policy and guidance will be applied by the Council when considering planning proposals on any sites within the Site Allocations section of the Plan (also see paragraph 12.1.6 of the Plan).</p> <p>If the Council were to adopt this approach, it could result in numerous cross-references to other policies, which could make in general the Site Allocations less clear and it could potentially imply that those policies not referred to have less weight.</p>