

16 December 2015

Fulham Football Club Training Ground, Motspur Park**in the Royal Borough of Kingston Upon Thames****planning application no.15/15210****Strategic planning application stage 1 referral**

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Replacement of indoor training facility and outdoor floodlit full-size all-weather pitch, the provision of additional floodlights and the erection of a covered spectator area for the arena pitch, the provision of an overflow car parking and associated soft and hard landscaping.

The applicant

The applicant is **F L Property Management Limited** on behalf of **Fulham Football Club**, and the architect is **Rathbone +Miller**.

Strategic issues

The key strategic issue is the acceptability of the replacement of an enlarged football airdrome on **Metropolitan Open Land**. Other issues assessed include **design** and **access, sustainable development/energy, flood risk management, and transport**.

Recommendation

That Royal Borough of Kingston Upon Thames be advised that the application does not fully comply with the London Plan, for the reasons set out in paragraph 49 of this report; but that the possible remedies set out in that paragraph of the report could address these deficiencies. The application does not need to be referred back to the Mayor if the Council resolves to refuse permission, but it must be referred back if the Council resolves to grant permission.

Context

1 On 6 November 2015 the Mayor of London received documents from Royal Borough of Kingston Upon Thames notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 17 December 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Category 3D of the Schedule of the Order 2008: "Development- (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan;

and (b) which would involve the construction of a building with a floor space of more than 1000 square metres or a material change in the use of such a building.”

3 Once Royal Borough of Kingston Upon Thames has resolved to determine the application, it is required to refer it back to the Mayor for his decision, as to whether to direct refusal or allow the Council to determine it itself, unless otherwise advised. In this instance if the Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

5 As shown below, the FFC Training Ground at Motspur Park is located within a predominantly residential area bounded by Blakes Lane to the North, West Barnes Lane to the East, Motspur Park to the South and Blakes Avenue to the West. The overall site area is 10.5 hectares. The whole of the site is in Metropolitan Open Land.

6 The application site can be subdivided into two distinctly separate parts. One is the open area where the majority of the training pitches are located across the eastern section of the site - the other area is that occupied primarily by the main Arena pitch and a number of existing buildings that are grouped together near the main entrance. These include the Pavilion and Rookery Buildings, the security reception, groundsmans and maintenance facilities. An existing floodlit artificial pitch is located to the north-east of the Pavilion Building near Blakes Lane. Part of this area is occupied by an air dome that forms an indoor training facility for the FFC Academy during the winter months from October to March. Temporary floodlighting is used on the Arena pitch for Academy league games.

7 The general ground level slopes gently down towards Beverley Brook, a small water course that flows along part of the north-east boundary of the site. The eastern-most part, where several pitches are located, is within the associated flood plain of the Brook. The site benefits from a significant number of mature trees and planting located around the perimeter of the site. These have been supplemented during the time FFC have occupied the site with additional planting introduced as part of a programme of enhancement carried out in conjunction with the Local Authority and arboriculture specialists to maintain and improve the natural appearance of the Training Ground. The northern and eastern boundaries are particularly well screened.



Aerial view of the application site: Source – applicant’s design and access statement.

8 The main access to the Training Ground is from Motspur Park in the southern corner of the site where the car parks and service areas are located. There are a number of mature trees and hedges in this area and a 2m high timber fence screens the visitors' car park from public view.

9 The nearest section of the Transport for London Road Network (TLRN) is the A3 Malden Way approximately 500m to the north of the site whilst the nearest section of the Strategic Road Network (SRN) is the A3298 Bushey Road, around 1km to the north. The site is located approximately 600 metres west of Motspur Park rail station, providing services to London Waterloo and other destinations. The nearest bus stops are located approximately 500m to the west on the A2043 Malden Road and 600m to the east on West Barnes Lane providing access to four routes. Considering the above, the site generates a public transport accessibility level (PTAL) of 2 (on a scale of 1 to 6b where 6b is the most accessible).

Details of the proposal

10 This detailed planning application seeks permission for replacement of existing indoor artificial pitch with an enlarged indoor facility, full size and fully floodlit outdoor artificial pitches, and covered spectators facility (with 250 seats), and installation of 16 permanent floodlights replacing the 6 mobile floodlights and additional car parking spaces.

Case history

11 In 2012 planning permission was granted on appeal for the provision of an air dome indoor training facility (ref: 01/05012/FUL). It is understood that the Inspector noted that the loss of Academy status would be a severe blow to the club, and subsequently allowed the appeal.

Strategic planning issues and relevant policies and guidance

12 The relevant issues and corresponding policies are as follows:

- Land use principle *London Plan;*
- MOL *London Plan;*
- Urban design *London Plan;*
- Access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Flood risk management *London Plan;*
- Transport *London Plan; the Mayor's Transport Strategy;*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Royal Borough of Kingston Upon Thames Core Strategy and the 2015 London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework.
- The draft Minor Alteration to the London Plan (MALP, 2015).

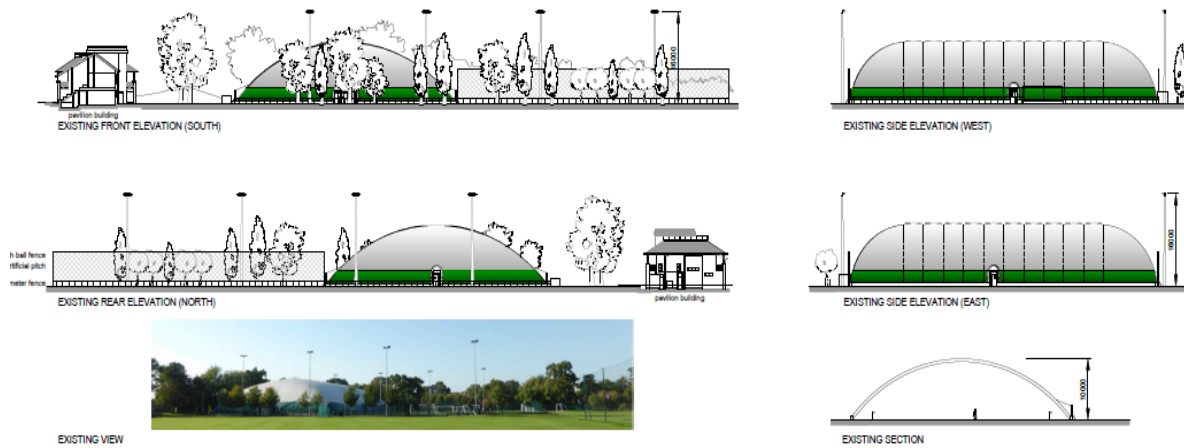
Principle of land use: Indoor facilities - Football Dome on MOL

15 The application site is part of a larger area identified as MOL. The London Plan (policy 7.17) gives the MOL the same level of protection as in the Green Belt, and the National Planning Policy Framework (paragraph 89) sets out that only development associated with agriculture, forestry, outdoor sport and recreation, limited infilling and redevelopment of existing sites is appropriate in the

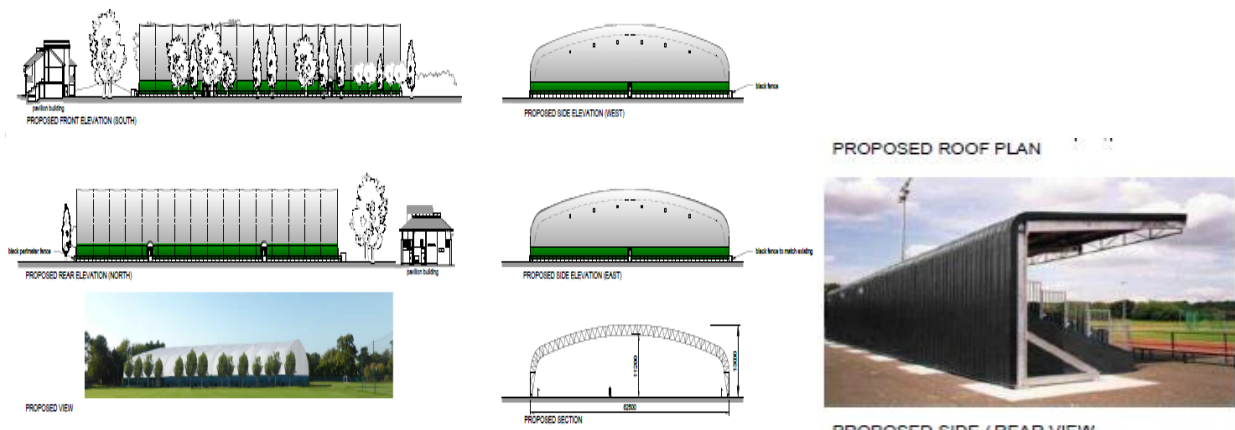
Green Belt. All other forms of development are, by definition, ‘inappropriate’. In order for the ‘inappropriate’ development to be acceptable in the MOL, very special circumstances must apply.

16 The NPPF in Para 87 sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘very special circumstances’. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Existing indoor facility – the football dome



Proposed indoor facility – the football dome & the spectators stand



The existing and proposed football dome & the spectators stand – Source: applicant's planning documents.

17 **Appropriate development:** It is acknowledged that the application for the full size outdoor fully floodlit artificial pitches can be considered as one of the exceptions as outlined in Para 89 of the NPPF discussed above (outdoor sport and recreation), and its impact on the openness of the MOL is considered limited. It is therefore an appropriate development on the MOL.

18 **Inappropriate development:** The proposals for the enlargement of the existing inflatable air dome over an existing indoor artificial pitch cannot be considered as an outdoor sport and recreation due to the dome's inherent nature of enclosure (as shown above). Given the additional height (from 10mts to 13mts) and the increase in surface area (from 61mts X 44mts to 77mts X 56mts), this element of the development in conjunction with the proposed enlarged covered spectators facility with additional 250 seats (36mts X 5mts with a height of 3mts), the combined increase in massing and scale will have an impact on the openness of the MOL. Therefore, these elements of the proposed development are inappropriate on MOL.

19 In light of paragraph 87 of the NPPF and Policy 7.17 of the London Plan, the onus is therefore placed on the applicant to demonstrate the very special circumstances under which planning permission should be granted for these elements of the development and that “the very special circumstances will not exist unless the harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations.”

20 **Very special circumstances:** The applicant has considered the inappropriate element of the development and has put forward very special circumstances which they have asserted to exist. The cases are summarised below:

- A compelling need for the development: The applicant has stated that the need for this enlarged indoor pitch inflatable dome and the outdoor pitch and the spectators stand is the result of the Football Association’s set requirements for Premier League and Football League Academy Status. Therefore, the enlargement of the football training ground would ensure that FFC can maintain their FA Academy Status.
- Benefits to the local community: The benefits to the local community outweigh the notional harm to the MOL. The FCC will continue to open the Academy up to the local community who wish to pursue a career within football. The benefits to the local community include:
 - The ability to allow coaching education for local clubs as well as FA coaching qualifications; and enable the Foundation Degree in Sports Coaching in partnership with Kingston University to provide work-based learning on site;
 - Enhanced partnership with Coombe Boys’ School and a future partnership with Blossom House School and Harris Academy; Increased access for young people to the training ground through the football and education programme and cater for BME group work;
 - Enhancement of Fulham’s Work Hub employability programme;
 - Allow Fulham FC’s Downs Syndrome team (Badgers) to train onsite (initially 1.5hrs per week);
 - Permanent all year round training facility for Fulham FC’s Deaf Team (2 x 2 hour weekday evening training slots for men and 1 x 3 hour weekday evening training slot for women); and provide facilities for inclusive programme Active Autism on site;
 - Would allow the implementation of a Girls Centre of Excellence for Fulham Ladies FC at Motspur Park (1 x 3 hour training slot per week to cover all age groups); and allow for Fulham FC Foundation Ladies Team to utilise the facilities (1 x 2 hour session per week plus potential gym usage for strength and conditioning (1hr per week));
 - Provide health programmes for local residents such as Health Champions and London Health Commission work including weight management and mental health;
 - The additional space would enable the FFCF Performance Centre to take place on a single site rather than multiple sites; and allow the establishment of a local Skills Club at Motspur Park with discounted usage for local residents.
 - In summary, these education and community benefits would only arise if permission was granted for the improvements to the training ground. These benefits together with the sporting benefits provide very special justification for the proposed inappropriate use within the MOL, particularly when balanced against the consequences of not undertaking the development and against the very minimal harm to the openness of the MOL that would result.
- Mitigating the harm: The applicant stated that careful consideration has been taken in locating the enlarged air dome at the existing dome area on the edge of the site, adjacent to the strongest and most mature tree belts on the site. The architects have worked with the contractors in order to minimise the dimensions and height of the structure to meet its needs to the amount of space suitable to deliver the optimal and minimum requirement identified by the Academy. On this basis, the applicant asserted that the indoor facility is the minimum required in terms of its width, length and height. The colouration of the fabric exterior of the

dome has been chosen to minimise its visual impact with the lower half being green to blend in with the vegetation and the upper half being white to blend in with the sky. The floodlighting pylons have been designed to be the minimum height to achieve the required lux levels. The height of the pylons is comparable to the existing pylons on site and on comparable sites.

- **Sequential assessment:** The planning statement states that the area of the search has been restricted to the existing site. This is due to the fact that the proposal is to extend the existing facility which is an established use on the site. This approach is in accordance with Paragraph 33 of the NPPG which states that *'when applying the Sequential Test, a pragmatic approach on the availability of alternatives should be taken'*. Regarding the extension of existing premises, Paragraph 33 states that *'it might be impractical to suggest that there are more suitable alternative locations for that development elsewhere'*. Therefore, the proposal is in line with the NPPG policy, in this respect.

21 **GLA officers assessment of the VSC:** The applicant has demonstrated the above points as very special circumstances that justify the inappropriate element of the development on MOL. Considering the compelling need for development, the benefits to the local community, and mitigation of the development such as locating the indoor air dome facilities at the edge of the site where the existing one is located, the choice of the colouration of the exterior of the dome and minimising the light pollution by designing the floodlight pylons to the minimum height, and the reasons for the sequential assessment, the proposal is acceptable, in this instance.

22 It should also be noted that the previous Mayor has accepted similar proposal for Crystal Palace FC on MOL (PDU/1244), and the current Mayor has accepted similar schemes on MOL/GB for West Ham FC (D&P/3766) and for QPR FC (D&P/3242).

Visual impact assessment

23 The inappropriate element of the proposal is mainly the 13m high football dome (at its maximum elevation point) replacing the existing 10m high dome and the spectators stand with additional seats. The applicant has provided visual impact analysis of this development including verified views from key points in the surrounding area and the mitigation strategy proposed in design terms. It is welcomed that the mitigations measures minimise the impact and this in conjunction with the above special circumstances which justified the development on MOL, the visual impacts on balance are considered acceptable, in this instance.



Masterplan of the proposed landscape: Source – applicant's planning documentation.

Urban design

24 It is understood that the design of the inflatable football dome is to a large extent, fixed by the technology proposed. There are no strategic design concerns.

25 As shown above in the landscaping masterplan and the mitigation measures proposed (mainly locating the enlarged air dome at the existing dome area on the edge of the site, adjacent to the strongest and most mature tree belts on the site), are considered to minimise the visual impact of the development on the openness of the MOL. These measures are welcomed.

Impact on residential amenity

26 There will be a change to the floodlighting provided on the site that could impact on neighbouring residential amenity. The applicant should set out the likely hours of operation and the extent to which the lighting has been designed to mitigate its impact on its neighbours.

Inclusive design

27 The applicant has stated that all of the facilities covered by the proposal will be accessible for the disabled and wheelchair users and that access to the indoor training facility will be via suitably sized airlocks with flush thresholds, wide doors (minimum 900mm clear width) and suitable finishes to assist access for wheelchair users and ambulant disabled. Approaches and pathways will be level or provided with shallow gradient ramps compliant with current Building Regulations. The outdoor pitch will also be provided with suitable wheelchair access compliant routes.

28 The design and access statement states that the overflow car park will improve access for the disabled and wheelchair users visiting the site by increasing the number of disabled parking bays from 1 to 4. The spectators viewing facility will be provided with 4 wheelchair spaces. There are existing accessible toilets at the Training Ground already so no addition facilities are deemed to be required. The detailed design of the new facilities will also be compliant with Child Safeguard regulations. Emergency exit routes and alarm systems will be designed to cater for the disabled and hard of hearing. Whilst the proposed measures are welcomed, the wheelchair parking spaces need to be increased to 6 (see TfL comments below). All the measures should be secured through conditions.

Sustainable Development - Energy

29 The applicant is proposing high efficiency LED floodlights throughout the facilities, and it is predicted that it will be approximately 50% more efficient than the current traditional flood lighting it will replace. The replacement floodlight lighting will also remove the requirement for the temporary generators that are currently required on site.

30 The new indoor pitch facility will replace an existing smaller air dome which requires year round inflation and frost protection during winter months using a combination of blowers and gas heaters. The new indoor sports pitch will remove the requirement for heating during operation due to the design and construction method of the proposed ridged steel structure with UPVC tensile fabric skin, which is welcomed.

31 In accordance with Policy 5.7 of the London Plan, the applicant is encouraged to investigate opportunities for incorporating renewable energy generation into the redevelopment of the site.

Flood risk management

32 Flood risk: A flood risk assessment has been submitted. It confirms that parts of the western half of the site (adjacent to Beverley Brook) are within Flood Risk Zones 2 and 3. These areas are also at high risk of significant surface water flooding, and an area along the eastern boundary is also at risk of significant surface water flooding. The assessment confirms that there would be no changes in finished levels. Since the areas most at risk of fluvial flooding are training pitches, the proposals are acceptable in terms of London Plan policy 5:12.

33 Surface water run-off: It is understood that a new artificial pitch will be installed within the Flood Zone 3 area. This, in combination with a new roof area, will introduce 12,081sqm in additional areas of impermeable surfacing compared with the existing situation. Surface water is proposed to be discharged to a granular sub-base beneath the new artificial pitch, designed to accommodate and

dispose of runoff from storms up to the 1:100 year + 30% climate change event. Post development discharge will be restricted to the equivalent greenfield runoff rate for storms up to the 1:100 year event. Should this system fail under extreme rainfall events or blockage, resultant floodwater will be routed along the existing topography of the site towards the Beverley Brook at the site's eastern boundary.

34 Despite recognising that the existing site suffers from surface water flooding, the assessment has not adhered to the hierarchy outlined in London Plan policy 5.13 and considered the potential use of swales, ponds, or rain gardens to help reduce this risk before considering sealed water features. This is disappointing, since swales could take advantage of the existing slope towards Beverley Brook and help reduce surface water flooding of the pitches. Swales would also have additional biodiversity benefits (London Plan policy 7.19).

35 The applicant should also consider 'Design for Exceedance', where some areas of open space such as a pitch or car park are designed to flood during longer return period storms. Without a compelling argument against the use of open water features to attenuate rainwater, and given the nature and location of the proposals, this approach is considered unacceptable related to London Plan policy 5.13.

Transport for London's comments

36 Motspur Park is currently being promoted as a Crossrail 2 station with additional services planned to call at the station from 2030. The site is not within the current safeguarded alignment; however TfL and Network Rail are considering future options for the station and land adjacent to it. This would provide additional train services to players and supporters.

Car Parking

37 There are currently 48 visitors car parking spaces provided on site, with an informal overspill area provided to the rear of this. It is noted that a further 29 spaces are provided for players and 42 car parking spaces for staff. Therefore, the site has a total of 119 existing formal car parking spaces on site.

38 The application proposes to formalise the existing overspill car park, to provide an additional 56 spaces amounting to a total of 103 visitor car parking spaces, therefore taking the total site car parking provision up to 175 spaces. The Transport Statement does not provide sufficient justification for this and TfL requests the applicant undertakes a car park accumulation study of the existing visitor car parking provision to ascertain the existing car park usage and demand for the overspill car parking area. A parking beat survey of the local area should also be undertaken in order to assess the existing impact on the local network, specifically during network peak hours and peak hours of car park usage.

39 For the proposed provision of 103 spaces, TfL requests a total of 6 Blue Badge spaces are provided for the application to be in line with the London Plan standards, which requires 6% of the total car parking provision for a sports facility to be allocated to Blue Badge parking.

40 The application proposes to provide 4 electric vehicle charging points (EVCPs). Whilst there is no standard in the London Plan for the number of EVCPs which should be provided for a sports facility, TfL suggests the applicant provides 20% active and 10% passive spaces for the employment element. This should be calculated once the overall level of provision has been agreed with TfL.

Trip Generation

41 Travel to work Census data has been used to determine the mode share of the existing training facility. TfL's Transport Assessment Guidelines clearly states where sites are currently in use; TfL would expect to see surveys to ascertain current levels of trip generation and mode share (specifically of visitors). TfL has a number of more detailed comments on the methodology which does not adequately assess the impact of the application on the highway network or provide the basis for the level of additional parking spaces proposed, particularly as the Transport Statement states that since the

capacity of the football ground will remain unchanged, no material increase in match related trips are anticipated.

Cycle Parking

42 The application proposes a provision of 12 cycle parking spaces. The London Plan states that 1 visitor space per 100sqm and 1 long-stay space per 8 staff, should be provided for use D2 (Sports). Therefore, TfL requests the applicant provides an appropriate number of spaces in line with these standards and that they are located in a secure, sheltered and accessible location. Visitors' cycle parking spaces should be located in a convenient location close to the site entrance.

Travel Planning

43 The applicant has indicated a commitment to submitting a full travel plan, which is supported. The travel plan should include targets and corresponding measures to encourage sustainable travel and, more generally, should accord with TfL travel plan guidance. The final version of the travel plan, including all agreed measures therein, should be secured, enforced, monitored and reviewed as part of the section 106 agreement, in accordance with London Plan policy 6.3. At present there is no target for reducing car trips or increasing modal share for public transport which would reduce the need for the level of spaces currently proposed. Guidance can be found on TfL's website.

Construction

44 TfL requests a construction logistics plan (CLP) and delivery and servicing plan (DSP) in line with TfL's guidance, is submitted and secured by condition. Guidance on the methodology and further information regarding construction routing has been sent to the council. Maintaining cycle safety during construction and ensuring construction vehicles avoid key strategic routes and peak hour movements is essential.

Summary

45 In summary, for the proposals to comply with the transport policies of the London Plan the following matters should be addressed:

- Further justification on the proposed car parking provision, including a car park accumulation survey of the existing visitor spaces and survey of existing visitors and their mode of travel.
- Increase electric vehicle charging points and Blue Badge parking in line with London Plan policy.
- Provision of cycle parking in line with London Plan standards.
- The travel plan should be secured via section 106.
- DSP and CLP should be secured via condition.

Local planning authority's position

46 Royal Borough of Kingston Upon Thames planning officers have yet to confirm their position.

Legal considerations

47 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged or direct the Council under Article 6 of the Order to refuse the application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

48 There are no financial considerations at this stage.

Conclusion

49 London Plan policies on principle of land use and MOL, design, inclusive access, sustainable development, flood risk management, and transport are relevant to this application. The proposed development broadly complies with the London Plan. However, there are few issues that must be addressed as set out below:

- **Principle of land use/MOL:** The proposal for the full size outdoor fully floodlit artificial pitch can be considered as one of the exceptions as outlined in Para 89 of the NPPF (outdoor sport and recreation) and its impact on the openness of the MOL is limited. It is therefore an appropriate development on the MOL. The proposal for the enlargement of the existing indoor facility football dome is inappropriate however the applicant has demonstrated very special circumstances that have justified this element of the development on MOL.
- **Visual impact & design:** The applicant has provided visual impact assessment and has outlined mitigation design measures which would minimise the impact of the development on the openness of the MOL.
- **Inclusive access:** The proposed inclusive access measures are welcomed, though the Blue Badge parking should be increased to 6, and all the measures should be secured.
- **Sustainable development – Energy:** There are no strategic energy concerns, but the applicant is encouraged to investigate opportunities for the use of renewable energy sources.
- **Flood risk management:** The applicant should consider the use of swales, ponds, or rain gardens to help reduce surface water flooding risk before considering sealed water features and take into account the use of open water features to attenuate rainwater.
- **Transport:** Further justification is required on the proposed car parking provision, including a car park accumulation survey of the existing visitor spaces and survey of existing visitors and their mode of travel. Increase electric vehicle charging points and Blue Badge parking in line with London Plan policy. Provision of cycle parking should be in line with London Plan standards. The travel plan should be secured via section 106. DSP and CLP should be secured via condition.

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