

# Stamford Bridge Grounds

in the London Borough of Hammersmith & Fulham

planning application no. 2015/05050/FUL

## 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

Comprehensive redevelopment of Stamford Bridge Stadium to provide a new 60,000 seat stadium (Class D2) with ancillary stadium-related uses including club shop, kiosks, museum, offices (Class D2) and retail (Class A3); together with the construction of raft structures over the District Line at Fulham Broadway Station to the north-west and the Southern mainline to the east to provide an enlarged concourse area with new pedestrian access from Fulham Broadway Station and Fulham Road; new vehicular access via Wansdown Pace; car parking; landscaping and related works.

## The applicant

The applicant is **Fordstam Ltd**, the planning agent is **Aecom** and the architect is **Herzog and De Meuron**.

## Strategic issues

The proposed development is strongly supported in principle in terms of contributing to London's **global status** and providing a **world class sporting facility** that delivers **economic benefits**.

The **design** of the scheme is supported, and the scale of development does not impact upon any protected **LVMF views**. There is some **heritage harm** caused, which is outweighed by the planning benefits. The scheme proposes an appropriate accessible and **inclusive environment**.

The scheme affects **transport infrastructure** through the decking arrangements and has a number of **transport implications**, for which further information and discussion is required. There are also outstanding concerns in relation to **energy** and **biodiversity** in particular, for which further commitments are sought, with suitably worded conditions and planning obligations required.

## Recommendation

That Hammersmith & Fulham Council be advised that while the application is generally acceptable in strategic planning terms the application does not fully comply with the London Plan, with the reasons and remedies set out in paragraph 93 of this report could address these deficiencies.

## Context

1 On 3 December 2015 the Mayor of London received documents from Hammersmith & Fulham Council 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 must 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 the following Categories of the Schedule to the Order 2008:

*1B(c)- Development which comprises or includes the erection of a building outside Central London and with a total floorspace of more than 15,000 square metres (applications 1 & 2);*

*1C(b) - Development which comprises the erection of a building that is more than 30 metres high and is outside the City of London*

3 Once Hammersmith & Fulham Council 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; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website [www.london.gov.uk](http://www.london.gov.uk).

## Site description

6 Stamford Bridge is the home ground of Chelsea Football Club, which has been situated in this location in Fulham since 1877. The site contains the main stadium with a series of attached buildings (Chelsea Village), which contain hotel, conference and business centre facilities, health club, restaurant and cafes, and an underground carpark. Museum tours also take place and the facility has been used as a music venue. The current capacity of the stadium is 41,600.

7 The stadium is set back from the A304 Fulham Road to the south, separated by low scale residential and commercial properties. There are three pedestrian and vehicle access points from Fulham Road. Its eastern boundary is demarcated by the West London train line that runs between West Brompton and Imperial Wharf Stations (which are both located some 1.5km from the site). The Billings and Brompton Cutting Conservation Area extends across the railway cutting. The train line is also the boundary between the borough of Hammersmith and Fulham (LBHF) and Royal Borough of Kensington and Chelsea (RBKC). Beyond the railway line is the listed West Brompton Cemetery, which is within the Brompton Cemetery Conservation Area. To the south of Brompton Cemetery, fronting Fulham Road is the Billings Conservation Area.

8 To the north of the site is the District Line underground line (above ground at this point), with Fulham Broadway Station some 250 metres to the west, beyond the Sir Oswald Stoll Foundation residential estate. Fulham Broadway station is served by the District Line (Wimbledon branch). There are also ten bus routes (11, 14, 22, 28, 221, 295, 391, 414, 424 and C3) within an acceptable walking distance of the site. Earls Court station is approximately 1.5km from the site and is a major interchange for Underground services. The site has a public

transport access level (PTAL) of 5, on a scale of 1 to 6b where 6b is the most accessible. The proposed new pedestrian access route into Fulham Broadway station may further improve the site's PTAL on match days.

9 The site is within the viewing corridor from King Henry's Mound in Richmond Park to St Paul's Cathedral, as defined in the London View Management Framework. The site is also within Flood Zone 2 and 3, and is subject to an Open Space designation (covering the football pitch).

10 It is noted that the application site covers an area of 6.2 ha, including the grounds themselves, the West London rail corridor, the LU District Line Corridor, land to the north within the Brompton Park Crescent estate and land at Wansdown Place.

## **Details of the proposal**

11 The proposed development involves the demolition of the existing stadium, Chelsea Village, hotels, restaurants, museum, health club and associated buildings to provide a new football stadium with a spectator capacity of 60,000. The scheme includes ancillary stadium related uses and carparking.

12 In order to accommodate the slightly larger footprint of the stadium and enlarged circulation area (and to enable construction of a new pedestrian access), the scheme includes a decking platform over the District Line railway to the north-west and to the north of Brompton Park Crescent from Fulham Broadway station. This would also accommodate a new vehicular access from Wansdown Place. A decking platform is also proposed over the West London railway line to the east to extend the stadium building line, provide an enlarged circulation area, new pedestrian access from Fulham Road, and to enable creation of 123 sq.m. of commercial floorspace beneath the decking platform.

13 The proposed stadium footprint is 38,000 sq.m., with a maximum height of 46.12 metres AOD. The pitch would be sunk 6 metres below ground level with an excavation depth of up to nine metres below AOD - there would be 3 levels of basement beneath the stands, containing plant, servicing, car parking (246 cars), administration facilities, staff reception, media, hospitality, and entrances. The stadium bowl itself would comprise four stands, each with 5 levels (containing middle and upper tiers) and associated stadium facilities, concourse, and hospitality areas. Ancillary stadium shop and museum (3,606 sq.m.) and kiosks (4,250 sq.m.) are proposed. To minimise the increase in height of the new Stadium, the Stadium will incorporate basement levels

14 The construction period for the new stadium is anticipated to be three seasons, with works to the decking platforms aiming to precede this, potentially commencing in October 2016.

## **Case history**

15 There is no planning history of a strategic nature for this site. The applicant engaged in pre-application discussions with GLA officers regarding the current proposals. The advice provided confirmed support for redevelopment subject to satisfactory resolution of points raised in relation to contribution towards local economy, energy, sustainability, and transport in particular.

## **Strategic planning issues and relevant policies and guidance**

16 The relevant issues and corresponding policies are as follows:

- World city role *London Plan*

- Recreation, sports, tourism *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG*
- Tall buildings/strategic views *London Plan, London View Management Framework SPG*
- Inclusive design/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*
- Transport *London Plan; the Mayor's Transport Strategy; Land for Industry and Transport SPG*
- Sustainable development *London Plan; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Sustainable Design and Construction SPG*

17 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 Hammersmith and Fulham 2011 Core Strategy, the Hammersmith and Fulham Development Management Local Plan (adopted July 2013) and the London Plan 2015 (consolidated with alterations since 2011).

18 The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework are also relevant material considerations, as are the draft Minor Alterations to the London Plan (May 2015).

19 Hammersmith & Fulham Council (LBHF) also consulted on a draft Local Plan in January 2015 and this document has some weight as a material consideration.

## **Principle of development**

20 The existing site comprises a modern all-seater stadium, which has been the subject of various phases of development and complete reconstruction over the past 140 years, to reach its current seating capacity of 41,600. The stadium currently hosts Premier League matches, as well as other sporting events including international football friendly matches, Champions League and European football. It is also a major business and visitor attraction with hotel and conference facilities. Along with other premier ship clubs and large sporting stadiums across London, the scheme contributes significantly to London's global role and World City status, attracting visitors and spectators from across London, Europe and the rest of the world. Approximately 2.4 million people visit the site annually – 1.2 million annually on matchdays and 1.2 million on non-matchdays.

21 The applicant has set out a case for redevelopment based on the need to increase capacity to 60,000 in order to meet the club's aspirations for continued footballing success. The existing operational deficiencies have also been explained, which include poor sightlines, access and egress issues, poor enclosure and shelter, accessibility levels, lack of media facilities, servicing, logistics, and catering shortfalls. The expansion of the stadium and enhancement of the facilities would ensure its continued contribution towards London's World City status, and maintaining London's important role for professional sporting and entertainment enterprises. Therefore the principle of redevelopment is strongly supported in strategic planning terms, in accordance with London Plan policies 2.1, 3.19, and 4.6.

22 The applicant's environmental statement sets out that there are currently 807 FTE jobs at Stamford Bridge, comprising 403 full time employees and 404 part-time employees (2,281 casual/part-time employees at FTE equivalent). The applicant has set out that there would be 852 full time equivalent jobs resulting from the proposed development, representing a net increase overall. The applicant has also set out that there would be a net increase in spending to the order of £16 million, of benefit to local businesses and the community generally. The applicant envisages that there would be a broadly similar pattern of use within the hospitality areas of the stadium, and that there would be an increase in visitor capacity and numbers.

23 For the existing hotel uses, there is general policy support for increased hotel provision under policy 4.5 of the London Plan, which also seeks to protect strategically important hotel capacity. In this particular instance, the loss of the existing hotels is outweighed by the need to increase the capacity of the stadium and deliver the wider objectives for this premier league club. There are a series of design and amenity considerations that result in constraints to the site, thereby limiting the range of uses that could be undertaken. It is concluded that the scheme as proposed achieves an appropriate balance of uses, including an increase in job numbers.

24 In relation to the proposed retail and other ancillary commercial uses, these are appropriate in terms of active uses and adding to the overall offer for visitors and workers. The applicant has undertaken a retail impact assessment that looks at the temporary effect of the closure of stadium activities on local businesses within the Fulham town Centre. The report sets out the centre's function of serving local residents, workers and commuters and from a survey of businesses and assessment of the health of the town centre, concludes that the temporary closure and redevelopment would not have an adverse effect on Fulham's ongoing vitality and viability and its Major Centre status. The assessment does conclude that there would be an impact upon the turnover performance of food and drink businesses but notes that match days account for less than a tenth of the total number of trading days per annum. The applicant also acknowledges that the approximate 1,000 construction workers employed during construction phases would contribute towards local spending.

25 In terms of residential uses, there are presently 38 flats located within the Village Court complex and above the Copthorne Hotel, totalling 4,000 sq.m. The applicant is not re-providing this accommodation on-site but is intending to deliver the units elsewhere in the borough, secured via s106 planning obligation. There are no strategic concerns regarding the loss of this housing, given the function of the site for football activity. However it is expected that the Council would wish to secure replacement floor space elsewhere, with confirmation set out in the s106 regarding how this is calculated in terms of floor space, habitable room and any requirements for affordable housing set out.

26 The applicant has set out the range of local initiatives that the Club is currently engaged in via the Chelsea Foundation, in terms of school training/coaching sessions, soccer schools, education clubs, inclusion projects (including youth offenders) and senior citizen clubs, for instance. The applicant is proposing to enhance these and unlock additional community benefits. A number of initiatives are set out including coaching training, breakfast/after school club provision, education sessions, hospitality related apprenticeships, construction training and a local labour programme, for instance. This is supported in principle, in accordance with London Plan policy 3.19 and further discussion with the Council would be appropriate in order to refine and secure the commitments via planning obligation within the s106 agreement. These details should be shared with GLA officers at Stage 2.

## Urban design and strategic views

### Strategic views

27 The site falls within a designated linear view 9A.1 known as *King Henry VIII Mound to St Paul's Cathedral*, as set out in the Mayor's London View Management Framework SPG. The LVMF states that any development between the two that exceeds the threshold plane of the Landmark Viewing Corridor should be refused. Development that exceeds the threshold plane of the Wider Setting Consultation Area of the Protected Vista in the foreground and middle ground should not compromise the viewer's ability to recognise and appreciate the Cathedral. It should not dominate the landmark, or cause a canyon effect.

28 The applicant has produced a heritage/townscape impact assessment as part of its ES, which sets out verified views of the proposal from this Assessment Point, as well as various other key locations, as agreed with the Council. This confirms that the development would sit some 5 metres below the threshold plane of the Landmark Viewing Corridor and Wider Setting Consultation Area and would not compromise the viewer's ability to recognise and appreciate St Paul's Cathedral. The images provided indicate that the proposed development would not create a canyon effect nor dominate the landmark. The scheme is therefore acceptable in relation to LVMF impact.

### Heritage assets

29 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The applicant has undertaken an assessment of the scheme upon built heritage of the application site and surrounding area, which includes numerous designated heritage assets in LBHF and the RBKC. Of note is the Grade 1 registered Brompton Cemetery to the north-east, which is on the Register of Historic Parks and Gardens, and is also a conservation area (Brompton Cemetery) and a Royal Park. There are four other conservation areas (CA) within the applicant's study area: Moor Park, The Billings, Walham Green and Billings and Brompton Cutting, which comprises the railway cutting to the east of the site. The study area also includes 47 listed buildings. The heritage appraisal concludes that there will be no significant effects as a result of the proposed development on any heritage assets, with the exception of the Billings & Brompton Cutting CA, which "*will be subject to a major adverse effect*" as a result of construction of the decking platform over the rail corridor.

30 As set out in the application documents, Billings & Brompton Cutting CA would be completely decked over in order to expand the stadium bowl eastwards and provide circulation space around it. This CA comprises an undeveloped railway cutting and area of open space and is also a Site of Importance for Nature Conservation (SINC). This CA was designated in 2002 to recognise the transfer to LBHF of part of a conservation area designated by the RBKC, in order to control development of the railway cutting, as a buffer and green screen for the adjoining Billings CA, Brompton Cemetery CA and residential development to the east. As the decking would extend fully across the airspace over the railway line, enclosing the CA, the CA would no longer be visible. The applicant's heritage appraisal concludes that the scheme would result in a major adverse effect as it removes the open character and ability to appreciate the historic significance of this CA. GLA Officers agree with this assessment as the proposals would result in the total loss of the characteristics for which the CA was designated.

31 The NPPF states that when considering the impact of a proposal on the *significance* of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the

heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities, including the Court of Appeal in *Barnwell Manor*.

32 The statutory tests for listed buildings and conservation areas are set out in the Planning (Listed Buildings and Conservation Areas) Act 1990, which states that when making decision on a planning application which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. In the case of a conservation area, the LPA must pay special attention to desirability of preserving or enhancing the character or appearance of that area.

33 In coming to a conclusion on the acceptability of the decking elements, it is necessary to take account of the strong presumption against granting permission that would harm the character or appearance of a conservation area. GLA officers consider that an alternative approach that negates the decking over of the railway cutting would compromise the ability to provide the circulation space required to deliver the enhanced stadium. As noted by the applicant, the site is constrained in terms of height restrictions imposed by the LVMF strategic view and also rights to light issues. In order to deliver a stadium of the size and capacity required, this has necessitated such outward expansion, which has been undertaken within a similar volume. Officers also note that there have been permission previously granted for the construction of a new railway station and the principle of development on it has been established.

34 The applicant has set out a number of key benefits of the scheme, which include the provision of a new iconic world class football stadium that would reinforce London's World City Status. It would retain Chelsea Football Club at its historic home and keep a globally recognised sporting institution in the borough. The Club would continue to provide, and enhance a programme of community initiatives, job generation and spending in the local area. Officers are of the view that having assessed the heritage impacts, providing the public benefits set out above were secured as part of any consent, then the public benefits would outweigh the harm to heritage assets discussed above. It will it however, be important to ensure that the applicant's commitments are secured by way of legal agreement for the long term future.

35 In the case of Brompton Cemetery, the applicant's heritage appraisal sets out the various landscape features, funerary monuments, chapel and other features of the park, which includes Grade II and Grade II\* listed buildings and structures. This includes the circular arcade, which is Grade II\* listed and forms a focal point within the cemetery. The heritage and townscape appraisals note that the greater mass of the new stadium would be more dominant in some views from within the cemetery compared to existing, filling gaps in the skyline. As advised at pre-application stage, when considering the scale, mass, architecture and materials, GLA officers are of the view that the proposal would provide a welcomed improvement to the setting of the Cemetery when compared to existing, providing a unified backdrop that would still enable the viewer to appreciate the historic significance of the park from within, without drawing attention away from the key features. Whilst there is an increase in scale and bulk compared to existing, it is in the same location and has the same horizontal extent, and it is considered that the structural form and appearance of the proposed stadium mitigates the impact. As noted by the

applicant, new vantage points of the cemetery would be provided from the deck, which is also a positive outcome, as is the noise mitigation that results from the new stadium enclosure, compared to existing.

36 Officers are satisfied that the character, appearance and setting of all other heritage assets, conservation areas, during construction and operation would not be harmed by the proposals.

#### Layout, form, massing and architecture

37 The applicant has been clear about the need to increase the capacity of the stadium, with improved sightlines, better facilities and easier stadium access. Following a series of design iterations, the overall height and scale of the stadium is now broadly aligned with the geometry of the existing buildings, as indicated on the overlay plans. The additional capacity and volume is largely created by sinking the pitch lower and slightly extending the building line to the north and east over the cuttings.

38 The form of the stadium comprises a faceted polygon, articulated with vertical brick flying buttresses around its external elevation, within which the stadium sits with an open radial roof. Whilst a large structure in itself, as noted above the stadium would have a similar positioning, height and scale to existing, and has a unified form compared to the existing eclectic and non-coherent collection of bland buildings. Whilst there would be positions from which the building would be more visible, GLA officers consider that the scheme would not appear incongruous or have an overbearing impact on the surrounding residential character, due to its exceptional design quality and the separation distances that would be retained.

39 The architect has taken its cue for materials from the surrounding area and the architectural concept from the buttresses, arches and piers of nearby religious buildings. Officers welcome this unique approach to delivering an iconic sporting stadium that steers away from the steel framed and mesh wrapped structures that are typical of stadia developments. Overall GLA officers consider that the scheme would make a very positive contribution to the wider cityscape and deliver an iconic and outstanding piece of new city architecture for sporting venues. The palette of materials and use of brick, whilst unique for a stadium, would be in keeping with the local area.

40 The intention to open up the whole site to be publically accessible is also welcomed and gives the opportunity to provide a high quality of public realm, aligned with existing routes in the wider area. The scheme would knit the site into the area, where presently this is not the case and is a deficiency.

41 Overall, it is considered that subject to detailed design and build out that the stadium as proposed would be positive addition to London's townscape. The Council would need to ensure the design quality indicated is assured at build out stage by securing suitably worded planning obligations.

### **Inclusive design**

42 An access statement has been submitted, setting out the applicant's approach to inclusive design for the stadium, which has taken into account London Plan, British Standards and guidance for sports grounds/stadia. Consultation has taken place with the Level Playing Field Organisation and Chelsea Football Club's Disability Liaison Officer.

43 The applicant has confirmed that gradients would be no less than 1 in 20, and code-compliant hard landscaping materials would be used. Level access points are provided from Fulham Road, the Main Approach, Bovril Gate, and Britannia Entrance approach. Escalator entrances/exits to the Fulham Broadway tube station route would be provided, and there are also existing lifts and level routes provided via the main Fulham Broadway Station route. The applicant is proposing 250 code-compliant wheelchair accessible viewing spaces on the lower and middle tiers, with 19 Blue Badge parking spaces. Passenger lifts are provided to each level of the stadium and concession areas, museum and other facilities would also meet accessibility standards.

44 Overall, the applicant has given due consideration to providing a fully inclusive facility, including addressing failings in the current facility. These commitments should be secured by condition, and as the detailed design develops, the applicant should continue to engage with local accessibility groups, as indicated.

## **Sustainability – energy and climate change**

### Energy

45 The applicant has broadly followed the energy hierarchy however, the scheme falls short of the targets in the London Plan policy 5.2 and further revisions and information are required before the proposals can be considered acceptable and the carbon dioxide savings verified.

46 In relation to energy efficiency measures – both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other active features include low energy lighting. The demand for cooling will be minimised through building fabric design, including solar control glazing, recessed shaded external glazing, thermal mass (resulting from stadium construction materials) and free cooling. The development is estimated to achieve a reduction of 35 tonnes per annum (2%) in regulated carbon dioxide emissions compared to a 2013 Building Regulations compliant development.

47 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available.

48 The applicant should confirm the installation of a site heat network and confirm that all non-domestic building uses will be connected to the site heat network. The site heat network should be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.

49 The applicant has investigated the feasibility of CHP. However, due to the intermittent nature of the heat load, CHP is not proposed. This is accepted in this instance.

50 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. As previously advised, there are number of renewable technologies that could be technically feasible, i.e. solar photovoltaic (particularly building integrated type), ground source heat pump (which could supply 25% of hot water demand) and solar thermal. The applicant should reappraise the use of technically feasible renewable energy technologies on site. This is noting that the overall savings are 2%, falling short of the London Plan standards.

## Climate change adaptation and flooding

51 The applicant has submitted a sustainability strategy has been submitted, including a preliminary BREEAM pre-assessment. The site is within Flood Zone 3, although it is protected from tidal flooding by the Thames tidal defences. The site is also at risk of surface water flooding. The proposed basements preclude the use of infiltration techniques (including permeable paving) however, the applicant is proposing a number of measures to limit discharge to greenfield runoff rates. This is through the use of rainwater harvesting tanks for pitch irrigation and potential WC flushing, as together with two additional attenuation tanks for restricted flow to the combined sewer.

## Biodiversity and green infrastructure

52 The Ecological Impact Assessment (EclA) states that the proposals will result in the loss of a SINC and partial loss of two SINCS. No firm proposals have been identified for fully compensating for these losses. The proposed green roofs and 120 sq.m. of green walls will offer partial compensation. The EclA also states that negotiations regarding suitable sites for off-site compensation for habitat loss are ongoing. Given the destruction and fragmentation of existing designated sites by the development proposals, this off-site compensation should deliver net gains in biodiversity. Consideration should also be given to planting shallow rooting plants to help soften the edges of the concourses, which has been successfully achieved elsewhere on decked structures. Further discussion on this aspect is requested prior to Stage II with appropriately worded conditions secured as part of any planning permission to ensure the works are carried out and maintained.

53 Depending on the nature of the proposals, there may also be scope for the proposed drainage gullies and channels to contribute to London Plan policies 2.18 (green infrastructure), 5.10 (urban greening) and 7.19 (biodiversity and access to nature) by incorporating wetland species planting. These measures (together with measures to reduce the impact of lighting on biodiversity) should be secured via appropriate planning conditions.

## **Transport**

54 Following a series of pre-application discussions in light of TfL assets that are affected and the transport impacts of the scheme itself, there are a series of detailed comments set out below that have already been shared with the Council and applicant. Further meetings are programmed in order to address the outstanding concerns and will be reported in due course. Taking the matters in turn, the following is noted:

### Trip generation and mode split

55 Trip generation is based on a number of spectator surveys. Arrival and departure profiles are derived from these surveys along with mode share. It is important that trip generation by players, officials and media is fully accounted for within the transport assessment (TA) although it is not clear how this has been derived or where it is included in the overall trip generation. This will need to be addressed in a supplementary submission because travel patterns are likely to differ from spectators. Players and officials will have access to on-site parking and there is predicted to be a 133% increase in tickets allocated to media / players from 120 to 280.

### Parking - On-site car parking

56 The current allocation of 290 spaces identifies 50 spaces for residential parking, 179 spaces for public visitor parking (including hotel guests), 32 spaces for staff parking, 7 spaces

for health club members and contractors and a further 22 spaces for staff and contractors vehicles. On match days car parking is made available to officials, players and their families and staff members. Six parking spaces are available for disabled spectators.

57 The scheme proposes 246 car parking spaces. Given that the residential uses, hotels and the health club will not be re-provided, TfL concludes that there will be a significant reduction in non-match day parking demand. TfL accepts the need for some operational staff and contractors' parking but this should be strictly limited. Assuming that hotel guests occupied 50% of the visitor parking this could lead to a reduction of 146 spaces. Given the increase in tickets for disabled spectators and carers, it would be appropriate to create a high percentage of Blue Badge spaces, which could be specifically allocated for this purpose on match days. As many car parking spaces as possible should be provided with electric vehicle charging points in accordance with London Plan policies. A site car park management plan will need to form an integral part of the Stadium Management Plan and approved as part of the application.

### Off-site car parking

58 Based on the predicted trip generation, and in the absence of effective mitigation, there will be additional off-site parking pressures as a result of the stadium expansion. The draft TA presents figures based on survey data suggesting that there will be demand for an additional 1,616 parking spaces on a Saturday, rising to 2,091 on a Sunday and 2,023 on a week night. Although a summary of survey data is presented on match day parking availability for Saturdays and Sundays, no data has been presented for parking availability on week nights. This omission needs to be rectified through a supplementary submission of survey data from a week night because of the increased spread of matches across the week and the different parking profiles.

59 To tackle the increased pressure for off-site car parking at source, TfL expects to see a much firmer commitment to try to achieve modal shift particularly amongst the categories which have higher car use and will show a high proportionate increase such as hospitality ticket holders. There should be a range of incentives to encourage alternatives to car use including shared transport, innovative approaches to ticketing and stronger discouragement of driving to matches. Targets should be set for the different categories of ticket holders to try to reduce car use over time to bring the overall car driver trips back to the current baseline i.e. no net increase. These measures should be detailed in the travel plan and represent firm and binding commitments which will be monitored over time.

60 Regular off site car parking surveys will be required, supported by a formal review of the operation of existing match day controlled parking zones in the surrounding area which should consider the need for extensions to include Sundays. The surveys and reviews should be funded by the applicant.

### Cycle parking

61 The scheme currently proposes 427 cycle parking spaces for permanent and match day staff, within secure cycle stores. It is not clear how this figure has been derived noting that TfL seeks 1% cycle provision for spectators on match days (consistent with the approach for other major sports stadia), which equates to 600 spaces. The applicant has stated that this level of provision cannot be accommodated on site, but noting the reduced level of car parking sought by TfL, there is an opportunity to convert some of the basement space to cycle parking, which could be used by spectators on match day. If any off-site provision is planned, the applicant needs to identify potential locations in the vicinity of the site for the proposed alternative cycle parking facilities. The travel plan should include continuous monitoring of demand and supply for cycle parking so that facilities can be increased to match demand. Confirmation is also

required on the location of the cycle parking and entrance points, and size of corridors and aisles. Short term cycle parking for visitors on non-match days should also be provided in an accessible location, with provision exceeding the minimum standards in the London Plan.

62 TfL also requests funding for expansion of existing cycle hire stations in the surrounding area with sites at Hortensia Road and Eel Brook Common appearing to offer the greatest potential for expansion subject to more detailed surveys. LBHF may be able to identify alternative new sites that could meet the increased demand.

63 There is an opportunity for Stamford Bridge to be an exemplar in provision of cycle facilities and the above matters should be addressed in order to deliver expected benefits.  
Taxis & Private Hire Vehicles (PHV)

64 The TA states that there will be an increase in use of taxis/PHVs but as they will not be allowed to pick up or set down near the stadium, the applicant claims that there will be no effect on traffic. This is misleading and there is likely to be a substantial effect on congestion on the roads that are open, if designated areas for these vehicles are not put in place. There will also be an adverse impact on essential taxi users who include disabled passengers.

65 Given the high proportion of taxi/PHV trips expected to be generated by the proposal, an appropriately sized taxi rank should be provided to formalise the current ad hoc arrangements. This should be operational only on match days, to help minimise congestion on the highway from taxis picking up and setting down customers. Space will need to be found for this facility. The Mayor has adopted a Taxi Rank Action Plan, which sets a target to increase the availability of taxi ranks, particularly where unmet demand is highest.

66 The following initiatives should be considered by the applicant, to form part of a formal taxi management plan, which would be agreed as part of the application:

- A taxi rank (for Hackney Carriages/black cabs only) to serve the match days;
- Set down/pick up facilities for taxis and PHVs;
- Use of professional marshals during match day operations.

67 As a first step, an outline taxi management plan should be submitted as part of the application for agreement with TfL and the two boroughs.

#### Public Transport Impact - Buses

68 As part of the TA, an analysis has been carried out looking at the match day impact on the bus network and individual services. From a capacity perspective there is no case for increasing bus capacity based on the information provided.

69 There are currently various traffic/crowd management interventions on match days that require diversion to bus routes. It is understood that the existing temporal and geographical extent of road closures and management will not be extended, noting that there would be concerns if there are any additional or extended closures or diversions planned. This is on the basis that it delays buses in the area and impacts non-football related bus passengers

#### London Underground

70 As part of the stadium redevelopment proposals, an additional entrance will be provided at the southern end of Fulham Broadway station for use by spectators on match days. The static

station modelling indicates that the new pedestrian route will improve match day access to Fulham Broadway and that the station can continue to operate effectively.

71 Whilst this aspect of the scheme is acceptable there are concerns about the conclusions reached in relation to the impact upon Earl's Court Station, particularly in terms platform crowding and interchange with the Piccadilly Line. The TA forecasts that there will be an additional 668 spectators interchanging at Earl's Court station in the peak hour before Saturday matches. For weekday matches this increases to an additional 822 spectators interchanging in the peak hour. If there is any network disruption or coincidence of major events the situation could raise safety concerns. No detailed modelling has been presented as part of the TA for Earl's Court station.

72 There is therefore a need to carry out additional analysis and/or station modelling at Earl's Court before a view can be taken about the scale of impact on the operation of the station, whether this impact can safely be accommodated without disrupting station operations and if so how this can best be mitigated. Although promotion of walking routes to the Stadium from Earl's Court through the travel plan may help, there is likely to be a need for a more proactive approach. The station modelling and analysis should assume a worst case scenario without any of the potential measures in place.

73 There are also concerns about the methodology used to assess line capacity. This could clearly have significant implications in terms of the ability of the train services to cope with the additional demand generated by this development. These concerns have all been set out in a more detailed response to the borough and the applicant.

#### London Rail

74 The net impact of the stadium capacity increase on London Rail services and stations including West Brompton and Imperial Wharf is acceptable although the cumulative impacts of long-term development and infrastructure proposals including Earl's Court, Fulham Gasworks, White City and Old Oak are likely to lead to increased crowding on the West London Line stations and services in future. More information on the impacts and timescales of construction works on the operation of London Overground services on the West London Line is required as part of a supplementary submission.

#### Highways Impact

75 It is understood that the existing pedestrian access points onto Fulham Road will be retained and that vehicular access will be provided via a new ramped access from Wansdown Place. On match days, Fulham Road is closed between Hortensia Road and Fulham Broadway/Harwood Road for 45 minutes before kick-off, and again at the final whistle for a further 30-35 minutes.

76 Due to the dispersal of match day traffic on surrounding routes, TfL has no requirement for additional modelling of the Transport for London Road Network (TLRN) and is satisfied that the additional impact on the TLRN when the stadium is operational will be acceptable. However, impacts during construction are likely to be of much greater concern, particularly when the cumulative impact of other development and infrastructure projects in the area is taken into account (see comments below).

### Local Area Management Plan

77 TfL will need to be closely involved in the development and implementation of the suggested local area management plan (LAMP). As stated, TfL would not want to see any extension of the time or area affected by road closures and all efforts should be made to minimise disruption to the operation of bus services and the Strategic Road Network. In developing the LAMP, London Underground will need to advise on station access, management and safety both pre and post-match. This will be particularly important given the changes to pedestrian routes and queuing in and around Fulham Broadway station.

### Travel Plans

78 TfL welcomes the submission of match day and non-match day travel plans however there are a number of concerns that have been set out in detailed comments to the applicant and the Council regarding modal shifts, survey information, targets for car passengers, use of public transport as a whole (taking into account concerns about interchange at Earl's Court on match days) and walking/cycling for local trips. A comprehensive series of measures will need to be included in both travel plans with the aim of reducing car use particularly amongst ticket holders and employees.

79 There is little detail on the specific measures that will be adopted, which should include wayfinding materials and infrastructure along the walking routes, the potential for funding active management in and around Earls' Court station on match days and provision of real time information using a range of media for people travelling to the Stadium. More detail should also be provided on the progress of discussions with TfL regarding joint, inclusive or group ticketing and how this could play a role in influencing travel behaviour. A more ambitious suggested aim for the match day travel plan would be to try to cap the absolute number of car journeys at existing baseline levels by steadily reducing the proportion of journeys by car. Measures should include positive incentives to use alternatives to the car particularly for people travelling short distances, as well as enforceable targets for reducing car use that will be monitored on an ongoing basis.

80 In addition to travel plans for a match day and non-match day, a construction workplace travel plan will also be required and should be submitted in draft form as a supplementary document for review. All travel plans should be secured, delivered, monitored and funded through the Section 106 agreement.

### Deliveries and Servicing

81 The TA includes a delivery and servicing Plan (DSP), which is supported in terms of ensuring that all servicing takes place within the site and avoids any impact on Fulham Broadway (an important route for buses). The finalised DSP should be secured by condition and submitted for approval by LBHF and TfL.

### Construction Logistics

82 The draft construction logistics plan (CLP) lacks detail and needs to be further developed before it can be accepted. Reference is made to the proximity of a bus stop to the proposed construction access. Any impact on bus operations or users should be minimised during demolition and construction.

83 It is likely that modelling and assessment of cumulative construction impacts will need to be undertaken, so that an agreed mitigation strategy can be put in place, due to concerns about

the impact of construction traffic. The draft plan estimates that there will be 100 HGV movements six days a week during the peak period of remediation. This is likely to have a substantial effect on the road network including the TLRN, which will carry much of the traffic. Disruption should be minimised by committing to a fully off peak delivery schedule. TfL is likely to require the applicant to agree caps on overall construction vehicle movements, particularly during peak hours as well as controls on routeing and timing of site deliveries using a similar approach to that adopted for the Earl's Court development. A formal co-ordination group which oversees all construction activities in the area may be required and the applicants would be expected to play a full part in this.

84 The impacts of construction works including decking on the operation of London Underground and London Overground services is also required as part of the CLP. It is claimed in the draft CLP that there will be no disruption to rail services on the District or West London Lines but this will need to be verified by confirming details of proposed works with the relevant rail authorities including infrastructure providers and rail operators.

85 The CLP should include mechanisms for liaison, monitoring and joint reporting as well as sharing use of facilities such as railheads, wharf facilities and/or consolidation centres that may be developed for other construction projects. The use of alternatives to road transport will need to be maximised in line with best practice for other major projects. Consideration should be given to the use of conveyors as well as conventional rail and river transport for bulk delivery of materials and the removal of spoil. Options to take advantage of the proximity of the West London Line should also be fully investigated. As a first step, TfL will need to review a more detailed CLP which should be submitted as a supplementary document. As stated above a Construction Workplace Travel Plan will also need to be submitted in draft form for review and secured through the legal agreement.

#### Non-match day events

86 Although it is understood that the non-match day events will not include concerts and are likely to include mainly conferences (which currently occur on non-match days already), restrictions on non-match day events will need to be detailed in the section 106 agreement and / or through conditions.

#### Community Infrastructure Levy

87 The Mayoral charge in LBHF is £50 per square metre (GIA). Further details can be found at: <http://www.london.gov.uk/publication/mayoral-community-infrastructure-levy>. LBHF has recently adopted a CIL Charging Schedule. Charges will apply to relevant developments to ensure that strategic transport and public realm improvements are delivered using CIL where these are included in the borough's regulation 123 list, although section 106 contributions will also be required to mitigate site specific impacts.

#### Rail infrastructure and assets

88 TfL has asset protection and commercial property interests as a result of the decking and station entrance proposals. These proposals will require separate approvals from TfL and London Underground. All issues affecting TfL assets and infrastructure will be dealt with by TfL Commercial Development. They are not addressed in these comments which focus on TfL's statutory planning role as strategic transport authority.

89 To summarise, there are a number of key principles set out above that need to be addressed before the application is determined and will need to be included in supplementary

submissions to ensure London Plan transport policies compliance. Further discussion is already underway and will be reported in due course.

## Local planning authority's position

90 Hammersmith & Fulham Council's views are not known at this stage.

## Legal considerations

91 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, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected 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

92 There are no financial considerations at this stage.

## Conclusion

93 London Plan policies on sporting facilities, employment, social infrastructure, heritage, strategic views, urban design, access, sustainability and transport are relevant to this application. The proposal broadly complies with the London Plan however, further information and/or confirmation, as detailed below:

- **Land use principles:** The principle of a new stadium that increases the capacity of the stadium, provides an increased amount of jobs and community facilities is in accordance with the London Plan.
- **Design, views and heritage:** The design of the scheme is fully supported, and the proposal would not impact upon the LVMF viewing corridor. The applicant has demonstrated the public benefits of the scheme that would outweigh any harm to heritage assets however, further discussion would be appropriate
- **Inclusive design:** The applicant has satisfactorily demonstrated that the scheme can provide a fully accessible and inclusive facility, which will be subject to satisfactory detailed design secured by way of condition.
- **Sustainability:** The scheme falls short of the carbon savings sought by the London Plan, and further analysis and information is required. The sustainability measures proposed should be secured by condition and further mitigation of biodiversity impacts is required.
- **Transport:** There are a number of key issues that need to be addressed before the application is determined and will need to be included in supplementary submissions to ensure London Plan transport policies compliance. This includes points raised above about impacts upon Earl's Court station, mitigation measures, survey information, construction logistics, trip generation, reduction in car parking, parking management, cycle parking, and taxi management

94 On balance, the proposals do not yet fully comply with the London Plan, and the above matters should be resolved before the Stage II referral.

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