



Rugby Football Union
Rugby House, Twickenham Stadium
200 Whitton Road, Twickenham TW2 7BA
T: 0871 222 2120 F: 020 8892 9816
englandrugby.com

New London Plan
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
London SE1 2AA

Email: LondonPlan@london.gov.uk

Date: 1st March 2018

Dear Mayor

Draft London Plan: Representations

The Rugby Football Union (RFU) welcomes the publication of the Mayor's draft new London Plan 'the Plan' and the opportunity to provide comments. The RFU welcome the Plan's aim to make London a better city for everyone, economically, socially and culturally. The RFU has a number of suggested amendments, detailed within this letter that it hopes the Mayor will consider and include ahead of submission to the Planning Inspectorate.

Twickenham Stadium

The Mayor will be aware that the RFU owns Twickenham Stadium, located in the London Borough of Richmond upon Thames.

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

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

Twickenham Stadium is a national stadium that provides a considerable opportunity for use for multiple purposes. Twickenham Stadium should therefore have supportive and positive policy at local, regional and national levels that recognise the distinct advantage that the national stadium facility provides both the Borough and wider London and south-east England area. Our below representations are therefore seeking to ensure that this support is included and made clear within the new London Plan.

Representations

Twickenham Stadium is a site of national social, economic and cultural importance. The RFU therefore strongly supports policies that seek to support the 24-hour city and policies that support social and cultural sites across London.

The RFU supports draft Policy GG5 'Growing a good economy' and in particular point F that states that those involved in planning and development must "Promote and support London's rich heritage and cultural assets, and its role as a 24-hour city". However, the RFU consider that the term 'cultural assets' should be defined within the justification text and definitions to clearly reference 'national stadiums' for clarity and to enable correct interpretation of policy. It is noted that at present only 'cultural quarters' are defined within the Definitions.

The RFU consider that international and national stadiums, including Twickenham Stadium, play an important role in both access and promotion of sports as well as contributions to cultural value both in terms of sports played at the venue as well as the diversification of the stadia for concerts and other events. The RFU therefore supports paragraph 5.5.5 that states that "Specialist sporting venues and stadiums also have a role to play in providing facilities and enabling wider access to sport, as well having an important cultural value" (our emphasis). The RFU agrees with this point but would request that this should be included within the policy wording for Policy S5, rather than only be mentioned within the justification text.

In respect of Policy HC5 'Supporting London's culture and creative industries', the RFU supports the protection of existing cultural venues, facilities and uses. However, in respect of paragraph 7.5.1, the RFU would comment that Twickenham Stadium is a 'national stadium' as opposed to a 'sporting venue' and 'national stadiums' should clearly be referenced within paragraph 7.5.1 as part of the capital's cultural facilities and venues.

Suggested amendment to paragraph 7.5.1:

*"...Cultural facilities and venues include premises for cultural production and consumption such as performing and visual arts studios, creative industries workspace, **national stadium**, museums, theatres, cinemas, libraries, and music and other entertainment venues, including pubs and night clubs. Although primarily serving other functions, the public realm, parks, skate-parks and sports venues can provide important settings for a wide range of arts and cultural activities"*.

The RFU supports the inclusion of paragraph 7.5.11 regarding London's internationally-renowned cultural institutions. However, the RFU request that Twickenham Stadium is referenced within this paragraph to sit alongside the other four national stadiums within London.

Suggest amendment to paragraph 7.5.11:

*"London is internationally-renowned for its historic environment and cultural institutions, which are major visitor attractions as well as making an enormous contribution to the capital's culture and heritage. There are many areas in London which are rich in cultural heritage and have a unique cultural offer. These act as key visitor hubs for Londoners and domestic and international tourists and as such should be protected and promoted. They include: clusters of museums such as the South Kensington museums complex; the theatres, concert halls and galleries of the Southbank/Bankside/London Bridge area; the theatres and cinemas of the West End; Wembley Stadium and Wembley Arena; **Twickenham Stadium**; the Greenwich Riverside and O2 Centre; the Olympic Park; and London's Arcadia including Kew Gardens, parks, historic*

buildings and landscapes between Hampton Court and Kew along the River Thames. Boroughs should identify these and other strategic clusters of cultural attractions in their Local Plans.

In respect of Policy HC6 'Supporting the night-time economy' the RFU supports the Mayor's support for the night-time economy and in particular within strategic areas of time-time activity. As detailed above, the RFU consider that Twickenham Stadium is of national significance and should, therefore, be detailed on Table A1.1 and Figure 7.7 as an NT1 'Areas of international or national significance' site. In this regard, the RFU consider that paragraph 7.6.4 of the draft Plan that states "Areas of internal or national significance play a crucial role in putting London on the world stage, bringing internationally-renowned culture, performers and productions". The RFU consider that this statement directly applies to Twickenham Stadium and, therefore, this should be reflected within the Plan to ensure support for the Stadium and ensure its continued use as a Stadium of national, and international, significance.

Further HC6 Part B(6) should be amended to include 'national stadium' as following:

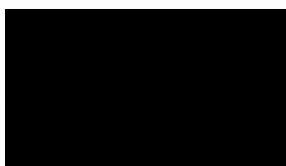
*"protect and support evening and night-time cultural venues such as **national stadium**, pubs, night clubs, theatres, cinemas, music and other arts venues"*

It is noted that Twickenham town centre is included within Table A1.1 and Figure 7.7 and is noted as being an area with 'more than local significance'.

The RFU supports Policies D12 'Agent of Change' and D13 'Noise' whereby policy seeks to protect existing noise-generating cultural venues from adjacent development and land uses brought forward, ensuring the cultural uses can continue in their present form without licencing restrictions or threat of closure from noise complaints.

The RFU trusts that the Mayor will consider the above representations and suggested amendments. The RFU would welcome further discussion with the Mayor and his Officers in respect of the above matters raised.

Yours faithfully



Fiona Evans MRICS

RFU Property Manager