

THE LONDON BOROUGH OF HAMMERSMITH AND FULHAM PROPOSED SUBMISSION LOCAL PLAN

Representations on behalf of Queens Park Rangers Football Club (Representor 76)
Response to the Inspector's Main Issues and Questions

We act on behalf of Queens Park Rangers Football Club (QPR) and have been asked to represent its interest at the forthcoming Examination in Public (EiP) into the Hammersmith and Fulham Local Plan. We welcome the opportunity to participate in the EiP on 13th June (White City) and 20th June 2017 (Proposed policies for community facilities, leisure, recreation, green and public open space and the River Thames).

As requested, we have considered the **Inspector's Main Issues and Questions** document dated 22nd April 2017 and set out below our responses. These responses maintain our objections and comments contained in our letter dated 28th October 2016. We look forward to expanding on these points during the examination.

Strategic Site Policy WCRA2 – White City West

Question 3:

Is Strategic Policy WCRA justified, with due regard to reasonable alternatives and the duty to cooperate, and will it be effective? Is it clear whether the housing numbers are targets/minimums? Should the plan reference the Opportunity Area Planning Framework for WCRA? Are the White City East and Shepherds Bush Town Centre defined robustly in the LP and shown appropriately on the policies map?

We support the principle of regeneration as set out in WCRA2. Our client is looking to relocate from its current ground at Loftus Road to another home in the Borough. At that point, Loftus Road will become available for residential led redevelopment, which will contribute to the regeneration initiatives and housing delivery to the area.

Question 5:

Is WCRA 2 (White City West) justified and will it be effective?

We support the reference to the Council supporting residential development at Loftus Road should it become available for redevelopment. However, the policy and the supporting text in paragraph 5.37 contain too greater reference to the re-provision of community facilities and open space. As drafted, such a requirement could frustrate redevelopment proposals for Loftus Road and should be amended to require that at any residentially led redevelopment should only include community facilities and open space that are directly necessary and proportionate to that development.

If QPR do relocate from Loftus Road, it will only be to a new and expanded ground to provide the Club with a sustainable future. The Club want to remain in the Borough and to work with LBHF to achieve this. Therefore, the wider benefits of any new development should be taken into consideration as these will replace and enhance the facilities at Loftus Road, which will be released

for redevelopment. It is also the case that the redevelopment of Loftus Road will play an important role in helping to enable and fund any new stadium.

Policy CF1 – Supporting Community Facilities and Services, Policy CF2 – Enhancement and Retention of Arts, Culture, Entertainment, Leisure, Recreation and Sports uses, Policy CF4 – Professional Football Grounds

Question 1:

Is CF1 (Supporting Community Facilities and Services) based on a robust evidence of needs and existing provision? Is it flexible and will it be effective in delivery?

We support the reference in Part 3 of the policy to improving the provision and range of leisure, recreation, sports, arts, cultural and entertainment facilities. However, we feel that this reference should be extended with an additional point (or an amendment to point b.) that recognises that the re-provision of facilities could more appropriately take place in a different location, with the existing location being redeveloped for an alternative beneficial use.

We also welcome part 4 of the policy and the support it provides for the continued presence of major sports venues. However, this could also be extended to include the appropriate expansion, redevelopment or relocation of such facilities, where this would enhance provision.

Question 3:

Is the approach to sport and recreation justified by a sufficiently robust evidence base?

We welcome the support this policy gives to the enhancement of these uses, particularly for sport, leisure, recreation and entertainment. However, we suggest that this policy should go further and give greater encouragement to the expansion, through relocation if appropriate, of the facilities that provide these uses. It should also acknowledge that appropriate enabling development could play an essential role in funding these facilities and then provide them with sustainable long-term futures.

Question 5:

Is the approach to QPR FC clear and consistent between Policy CF 4 (Professional Football Grounds) and WRCA 2?

We welcome the recognition the supporting text of this policy gives to the important role that professional football plays in the Borough. However, as drafted, the wording of the policy could frustrate attempts to expand these activities. This is particularly the case where such an expansion would involve the relocation of the professional football club. Where this is the case, the redevelopment of the existing ground for an alternative use is likely to be the most beneficial outcome, both to avoid the retention of unsustainable and obsolete facilities and to provide enabling development to facilitate the relocation.

Furthermore, it is also the case that this policy as drafted directly contradicts Strategic Site Policy WCRA2 - White City West. As referred to above, this specifically states that any redevelopment of Loftus Road should be residentially led. If the wording of policy CF4 remains unchanged for other reasons, it should be expanded with text that specifically excludes Loftus Road from it to avoid frustrating the overall regeneration aims of the plan in White City.