

Sara Chiong

From: Anna Stott <[REDACTED]>
Sent: 20 September 2024 16:59
To: Local Plan
Cc: [REDACTED]
Subject: Regulation 19 Draft Submission Local Plan Representations WHUFC
Attachments: 19.09.24_Representations to the Regulation 19 Newham Draft Submission Local Plan_PMV.WHUFC.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Local Plan Team

On behalf of West Ham United Football Club, please find attached representations to the Draft Submission Local Plan (Regulation 19).

We trust that these comments will be taken into consideration, and we would like to be kept informed on the Plan progress. Please do not hesitate to get in touch with us should you wish to discuss anything in our representations.

Kind regards

Anna

Anna Stott
Associate
BSc (Hons) MSc MRTPI



M: [REDACTED]
T: [REDACTED]
E: [REDACTED]

PMV Planning Ltd
Aldwych House
71-91 Aldwych
London
WC2B 4HN
pmvplanning.com

London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

By email
localplan@newham.gov.uk
PV/AS

20 September 2024

Dear Sir/Madam

**REPRESENTATIONS TO THE REGULATION 19 DRAFT OF THE NEWHAM
LOCAL PLAN ON BEHALF OF WEST HAM UNITED FC**

West Ham United Football Club (WHUFC) is pleased to provide comments on and suggested changes to the draft Newham Local Plan (2024). The Club is very keen to work with the council to promote Newham and is fully invested in the long-term legacy of the area as a place for sustainable regeneration and investment for the benefit of all residents in the Borough.

We have reviewed the draft Plan and a number of the supporting reports/evidence base including the Characterisation Study 2024, the Built Leisure Needs Assessment (May 2024), the Playing Pitch and Outdoor Sport Strategy (June 2024) and the Metropolitan Open Land (MOL) Review 2024.

WHUFC is a key stakeholder in the local community. It has been for over 125 years. The Club carries out a huge amount of work locally with schools, colleges and community groups with hundreds of partnerships, reaching up to 50,000 people every year.

The club has a diverse and multi layered approach which keeps the focus on the needs of local individuals, groups and communities it serves. Spearheaded by the club's official charity and CSR arm the West Ham United Foundation, which is based in Beckton, there is an equipped team on the ground which utilises the power of the badge to educate, inspire and empower.

Coinciding with this is the Player's Project, one of the most ambitious and integrated community programmes ever created by a Premier League club. WHUFC men's, women's and academy players regularly give their time to directly working with thousands of people from the local community. The scheme demonstrates how the West Ham United family comes together to address issues and advocate for campaigns important to fans and projects which respond to need in the local community.

The Players' Project consists of more than 35 initiatives which span all ages and abilities. These initiatives include health projects that support the most vulnerable,

providing mentoring, education and employment opportunities, helping to tackle discrimination of all forms, keeping children and young people engaged and challenged in sport and in the classroom, or providing the opportunity to follow their footballing dreams while also gaining qualifications off the pitch.

As part of this, some of the key programmes delivered in Newham are the Healthy Hammers programme - providing healthy meals alongside sport to thousands of primary school pupils who are most at risk of hunger, Moving on Up - so far supporting approximately 100 young black men from Newham into employment, and Any Old Irons - which engages with more than 300 local people over the age of 65, helping to tackle social isolation and form new friendships and connect with the club.

Moreover, with mental health issues increasing because of the pandemic, West Ham United led efforts to partner the NHS with the charitable arms of football clubs across the country and develop the Advantage mentoring programme. As well as increasing access to NHS Child and Adolescent Mental Health Services (CAMHS), the programme offers young people aged 14-21 the chance to informally connect with mentors in their community to re-establish their aspirations. Following the success of the scheme since launch, Advantage is now registered as a community interest company (CIC) and is being delivered nationally in collaboration with the NHS and clubs across the Premier and English Football League.

Beyond the direct delivery across the local community, the football club also helps raise the profile of the local area and Newham as a whole and is keen to both continue and expand its work with the Council and local groups. The club brings significant business and other socio-economic benefits to the local area, including local jobs both directly and indirectly. Independent analysis has revealed that WHUFC has contributed over £300million in GVA to the club's local economy of London and Essex, as well as supporting more than 3,300 local and regional jobs.

Furthermore, in support of the Borough's inclusive economy strategy, West Ham United has been at the forefront of the development and the collaboration of the third sector across Newham. Representatives from the Foundation have taken a leadership approach within groups such as: One Newham - a partnership network for the voluntary, community and faith sector consisting of 150 local organisations, and Newham Homeless Forum – with 19 organisations working together to share service provisions, assist each other and combat homelessness.

Representations made at Regulation 18 Stage

We submitted representations on behalf of WHUFC in February 2023 to the Regulation 18 version of the draft Newham Local Plan. In those representations we noted all the above and the importance of the Club to the local community and the Newham economy.

Our representations encouraged the Council to recognise this in the draft Local Plan, but our comments do not appear to have been taken on board. Therefore, we would like to reiterate that the **Local Plan should recognise the role the club plays in the local community**. Our previous representations are appended for

completeness.

LLDC powers are being handed back to the Council in December 2024 and in advance of this the Club is keen to work together, to invest further in the local area, whether this through enhanced community work; ensuring the London Stadium is used to its full potential; the creation of additional related facilities in and around the stadium; and the continued regeneration of the land as part of the Olympic Legacy to which the Club remains fully committed.

Representations to the Regulation 19 Consultation

Instead of restating our submission from February 2023 these representations focus on relevant updates and policies that have changed between the Regulation 19 version and the Regulation 18 version of the plan and which are of most interest to WHUFC, specifically in relation to the London Stadium.

Policy SI1

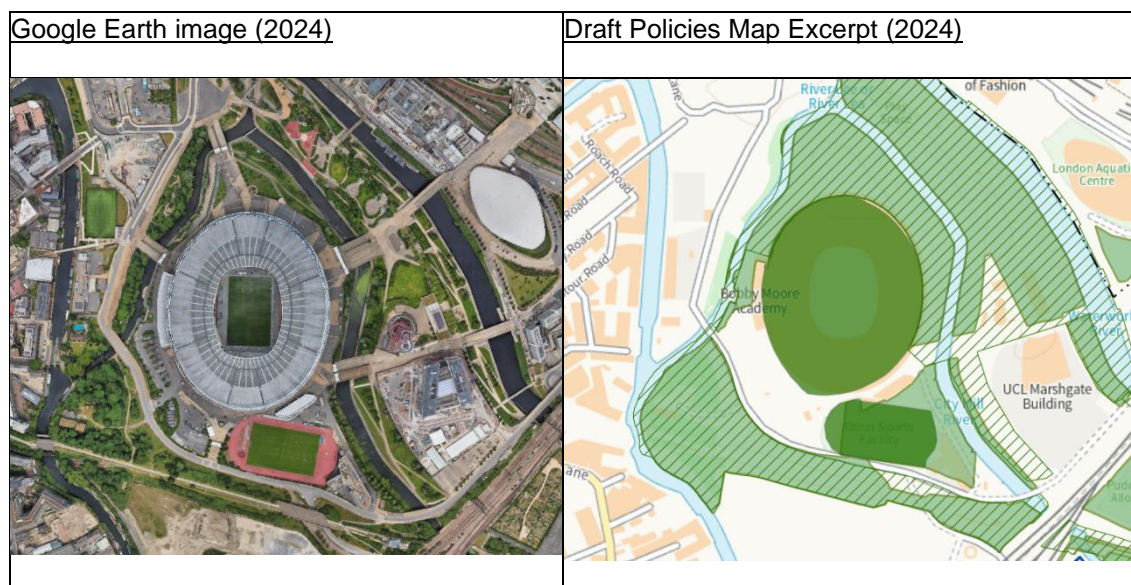
Proposed policy SI1 has been introduced since the Regulation 18 stage and it relates to “existing community facilities and health facilities”. This policy seeks to protect existing facilities across the borough unless it can be demonstrated that they are not viable.

Although we support the general aspiration of Policy SI1 which seeks to maintain good quality access to community and recreational facilities for the people of Newham, the policy should be worded differently to help encourage further investment to the area where appropriate. As set out in our previous representations, the stadium should be **recognised through a specific site allocation** under Policy N8 of the Plan.

Metropolitan Open Land

The draft Policies Map has also been updated to show the area directly to the north and east of the stadium as Metropolitan Open Land (MOL), including the northern concourse area which is previously developed land. MOL is given the same status as Green Belt in London.

The MOL encompassing the land around the London Stadium is known as MOL Area 32 within the Newham MOL Review (2024). The images below show an aerial image of the London Stadium alongside an excerpt of the draft Policies Map MOL designation. The green hatching on the policies map shows the extent of the MOL around the stadium and when compared to the aerial imagery it is clear that the current MOL boundary includes some amount of previously developed land.



Considering the current consultation on an updated National Planning Policy Framework (NPPF) which proposes to introduce a grey belt category of Green Belt it is reasonable to think that grey belt will become relevant to MOL in London by the time the Newham Local Plan is adopted. Grey belt is proposed to be: *“land in the green belt comprising previously developed land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes”*.

Grey belt land which makes a limited contribution to the five Green Belt purposes would be land that (*NPPF Consultation, 2024*):

- a) Does not strongly perform against any Green Belt purpose; and
- b) Have at least one of the following features:
 - a. Land containing substantial built development, or which is fully enclosed by built form.
 - b. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another.
 - c. Land which is dominated by urban land uses, including physical developments
 - d. Land which contributes little to preserving the setting and special character of historic towns.

This means that after brownfield sites have been considered, grey belt will be turned to next to consider its development potential. With that in mind, there is an opportunity as part of the ongoing Local Plan process for the council to review it's MOL boundaries and where land may be grey belt, remove it from the MOL designation.

Under the forthcoming NPPF changes, the developed land around the London Stadium would meet the proposed criteria to be considered grey belt as it contains substantial built development already and in our view, it does not perform strongly against any five of the Green Belt purposes. **The draft policies map should be updated to remove the previously developed land around the London Stadium from the MOL Area 32 designation.**

WHUFC would welcome discussions with the Council about the potential for a specific site allocation under Policy N8 of the draft Local Plan and how development could be delivered whilst supporting the identified Spatial Strategy (Policy BFN1) and the aspirations for the Stratford and Maryland neighbourhood supported by a redesigned Stratford Station.

We look forward to progressing a dialogue with the council and wish to be kept informed of any further consultations on the Local Plan and subsequent Examination.

Yours sincerely



Philip Villars

Appendix 1

London Borough of Newham
Newham Dockside
1000 Dockside Road
London
E16 2QU

By email
localplan@newham.gov.uk

20 February 2023

PV/CES

Dear Sir/Madam

**REPRESENTATIONS TO THE REGULATION 18 DRAFT OF THE NEWHAM
LOCAL PLAN ON BEHALF OF WEST HAM UNITED FC**

West Ham United Football Club (WHUFC) is pleased to provide comments on and suggested changes to the draft Local Plan. The Club is very keen to work with the Council to promote Newham and is fully invested in the long-term Legacy of the area, as a place for sustainable regeneration and investment for the benefit of all residents in the Borough.

We have reviewed the draft Plan and a number of the supporting reports/evidence base including the interim Built Leisure Needs Assessment (Dec 2022); the Characterisation Study 2022 commissioned by the Council; and the Sustainable Transport Study. We note that the Playing Pitch Study is still being developed and will be published alongside future Local Plan consultation.

WHUFC is a key stakeholder in the local community. It has been for more than 125 years. It carries out a huge amount of work with local schools, colleges and community groups with hundreds of partnerships, reaching up to 50,000 people every year.

The club has a diverse and multi-layered approach which keeps the focus on the needs of local individuals, groups and communities it serves. Spearheaded by the club's official charity and CSR arm the West Ham United Foundation, which is based in Beckton, there is an equipped team on the ground which utilises the power of the badge to educate, inspire and empower.

Coinciding with this is the Players' Project, one of the most ambitious and integrated community programmes ever created by a Premier League Club. WHUFC men's, women's and Academy players regularly give their time to directly working with thousands of people from the local community. The scheme demonstrates how the West Ham United family comes together to address issues and advocate for campaigns important to Hammers' fans and projects which respond to need in the local community.

The Players' Project consists of more than 35 initiatives which span all ages and abilities. These initiatives include health projects that support the most vulnerable, providing mentoring, education and employment opportunities, helping to tackle discrimination of all forms, keeping children and young people engaged and challenged in sport and in the classroom, or providing the opportunity to follow their footballing dreams while also gaining qualifications off the pitch.

As part of this, some of the key programmes delivered in Newham are: the Healthy Hammers programme - providing healthy meals alongside sport to thousands of primary school pupils who are most at risk of hunger, Moving on Up - so far supporting approximately 100 young black men from Newham into employment, and Any Old Irons - which engages with more than 300 local people over the age of 65, helping to tackle social isolation and form new friendships and connect with the club.

Moreover, with mental health issues increasing as a result of the pandemic, West Ham United led efforts to partner the NHS with the charitable arms of football clubs across the country and develop the Advantage mentoring programme. As well as increasing access to NHS Child and Adolescent Mental Health Services (CAMHS), the programme offers young people aged 14-21 the chance to informally connect with mentors in their community to re-establish their aspirations. Following the success of the scheme since launch, Advantage is now registered as a community interest company (CIC) and is being delivered nationally in collaboration with the NHS and clubs across the Premier and English Football League.

Beyond the direct delivery across the local community, the football club also helps raise the profile of the local area and Newham as a whole and is keen to both continue and expand its work with the Council and local groups. The club brings significant business and other socio-economic benefits to the local area, including local jobs both directly and indirectly. Independent analysis has revealed that WHUFC has contributed over £300million in GVA to the club's local economy of London and Essex, as well as supporting more than 3,300 local and regional jobs.

Furthermore, in support of the Borough's inclusive economy strategy, West Ham United has been at the forefront of the development and the collaboration of the third sector across Newham. Representatives from the Foundation have taken a leadership approach within groups such as: One Newham - a partnership network for the voluntary, community and faith sector consisting of 150 local organisations, and Newham Homeless Forum – with 19 organisations working together to share service provisions, assist each other and combat homelessness.

The Local Plan should recognise the role the club plays in the local community.

The club is keen to work with the Council, in advance of LLDC powers being handed back to the Council in 2024, to invest further in the local area, whether this is through community work; ensuring the Stadium is used to its full potential; the creation of additional related facilities in and around the stadium; and the continued regeneration of the land as part of the Olympic Legacy to which the Club remains

fully committed. Although it is recognised that the site sits within an Opportunity Area, and the Characterisation Study refers to the area around the Stadium as an **'Enhance Area – an area of moderate uplift and intensification of built density'**, this should be referred to more specifically in the Plan including at **Policy BFN1, Spatial Strategy**. This could take many forms and WHUFC would like to work closely with the Council and the local community to ensure that this potential is explored and built upon.

This site sits within one of the most sustainable locations in London, very close to Stratford town centre and a high level of public transport connectivity, including the recently opened Elizabeth Line, as well as walking and cycle routes and facilities, to other parts of the Borough and beyond. This allows the amenities and facilities in the **Opportunity Area** to be used by all, and WHUFC is keen to help ensure that regeneration benefits all residents and businesses in the Borough.

It is noted at **para 2.3.5** and **page 262** that there are plans to uplift the capacity of the Jubilee Line by 25% 'which would benefit the growth areas around Stratford and Canning Town' as well as the Olympic Legacy and **Policy BFN1** notes, under **N8 Stratford and Maryland**, that development will be supported by a redesigned Stratford Station. This development is anticipated to include 47,000 new homes, 90,000sqm of office space, 335,000sqm of industrial development and 26k sqm of retail. The Plan says the improvements to Stratford Station 'may require funds from development which impact on the station', as well as wayfinding, cycle hire and local transport improvements. The Club already works closely with the Council on local transport improvements and has contributed to delivering these.

We suggest that the former Olympic Stadium and its environs should be identified as both a use which should be embraced as a key legacy and prioritised when future public transport capacity is being considered and that **its role in further assisting with the sustainable regeneration of the area is recognised**.

We note and support the statement at **Policy BFN1.2** that development should optimise the use of available sites – referring to the London Plan which says that the Olympic Legacy Opportunity Area can deliver the most new homes and jobs of all areas across London, referring to the role of the Elizabeth Line in particular as a key investment to help deliver this opportunity. Future investment in and around the Stadium area can be a part of this growth aspiration and should be recognised through a **specific allocation in Section 4 of the Plan**. WHUFC would welcome discussions with the Council about the framing of such an allocation, building on the **'Enhance Area' designation at Policy BFN1** (see above), and how it can be delivered.

Yours faithfully



Philip Villars