

**Matter 3 – The Spatial Strategy and Spatial Development
Priorities**

“Issue: Whether the Spatial Strategy and policies for the Spatial Development Priorities are justified, effective, consistent with national policy and in general conformity with the London Plan.”

Matter 5 – Economy and Employment

“Issue: Whether the City Plan has been positive prepared and whether it is justified, effective, consistent with national policy and in general conformity with the London Plan in relation to economy and employment.”

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On behalf of:

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1. Matters, Issues and Questions identified by the Inspectors

1.1 Introduction

1.1.1 This statement has been produced by Turnberry on behalf of Marylebone Cricket Club (MCC), which owns and operates Lord's Cricket Ground, in support of the Examination in Public (EiP) of Westminster City Council's (WCC) City Plan 2019 – 2040 (the Plan). This statement responds to **Matter 3 - The Spatial Strategy and Spatial Development Priorities** and **Matter 5 – Economy and Employment**.

1.1.2 Founded in 1787, Marylebone Cricket Club is the world's most famous cricket club and retains the unique position as the custodian of the laws of cricket and Lord's as the home of cricket. No other ground anywhere else in the world comes close to matching the historical and cultural significance of Lord's in relation to cricket. In addition to its historical and cultural value, Lord's makes a significant economic contribution to the City's visitor economy, providing benefits for local residents and businesses as well as the London-wide economy. Lord's is also the base and the focus for outreach with local schools, driving up participation in cricket.

1.2 Background

1.2.1 We have responded to previous stages of consultation on the emerging City Plan as well as engaging in very constructive discussions with the Council to agree a Statement of Common Ground (SoCG). Throughout this we have been consistent in ensuring that the significance of Lord's should be explicitly referenced in the Plan, with flexibility built into the Plan to ensure that proposals for the development and improvement of Lord's are supported as and when they come forward. These discussions culminated in an SoCG (SCG 008) and we are grateful to the Council for responding to our concerns.

1.2.2 Our initial representation submitted in July 2019 requested that, as one of the largest single-use sites within Westminster and a site of significant cultural, historic and economic significance, Lord's should be added to the Key Diagram. Further to this we requested that text be added to *Policy 16 Visitor Economy* to specifically reference Lord's. After discussions with WCC, a Statement of Common Ground was agreed in

January 2020 (SCG 008) resulting in minor amendments to Policy 1, Clause 5 and Policy 16, Clause B. If the Inspector is minded to support these modifications, MCC would be content to withdraw its objection to the submitted version of the Plan.

- 1.2.3 The proposed Modifications pertaining to Lords as set out in SoCG (SCG 008), are essential in creating a positive policy framework within which Lord's can continue to bring forward essential development in support of UK and international cricket. This development can range from minor match day overlay (bars, equipment, plant and public realm improvements), to essential infrastructure such as the world-leading retractable floodlights (after a trial period lasting 10 years, these were finally granted permanent permission last year) and a series of major stand redevelopments. Presently, a new stand designed by Wilkinson Eyre is under construction following the complete demolition of the outdate Compton and Edrich Stands. Lord's is pursuing a gradual programme of reconstruction and planning applications raising complex and essential operational and sporting requirements which will continue to be submitted in the years ahead. It is important that these applications have a supportive policy framework given that the Ground operates in a very constrained residential area. Without that positive framework, there is a risk that the planning balance will be weighted against the complexities an international sporting venue raises within a World City.
- 1.2.4 It is entirely appropriate that the Local Plan addresses the needs of sport in the Borough, particularly a venue which is internationally significant. Paragraph 35 of the National Planning Policy Framework (NPPF) states that Plans must be "*positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs*" and that this must be "*justified – an appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence*" and "*effective – deliverable over the plan period*". Further to this plans must be "*consistent with national policy*". Paragraph 91 of the NPPF requires planning policies to achieve healthy, inclusive and safe places "*which enable and support healthy lifestyles, especially where this would address local health and wellbeing needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling*".
- 1.2.5 Paragraph 92 of the NPPF states that "*to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should*

plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments". The paragraph goes on to state that policies should "*ensure that established shops, facilities and services are able to develop and modernize, and are retained for the benefit of the community*". Indeed, it would be unsound if the Local Plan overlooked planning for sport and specifically a sporting venue that the Plan itself recognises is a sporting venue which is culturally and internationally significant.

1.2.6 Therefore, should the Inspector conclude that these modifications are not sound, MCC would have no option but to find alternative means of ensuring their concerns, as set out in our original objection dated from July 2019, are met.

1.2.7 These suggestions included the following:

1. The inclusion of Lord's Cricket Ground on the Key Diagram (Figure 7); and,
2. The inclusion of a clause specifically referencing development at Lord's Cricket Ground in Policy 16 Visitor Economy on the basis its cultural significance is sporting-based.

1.2.8 In a similar vein, we would suggest an addition to the glossary of 'Uses of International and/ or National Importance' as referenced in Policy 1, Clause 5 to clarify its application in the Local Plan.

1.2.9 We will now set out our responses to the specific questions raised by the Inspector in respect of Main Matters 3 and 5.

2. Response to Main Matter 3 - The Spatial Strategy and Spatial Development Priorities

Policy 1

14) What would be the implications of the proposed modifications for the City Plan as a whole?

15) Are the proposed modifications necessary for soundness?

2.1 Our response looks at Questions 14 and 15 together and primarily focusses on Modification PS/S/01, which in our view is necessary for soundness and increases the effectiveness of the Plan. The implications of the proposed modification are to allow Lord's to develop and modernise in line with its unique position as the most significant cricket ground in the world, protecting its status as a sporting venue of international importance. The Council describes it as a cultural venue of international importance, which is correct, but it is in a sporting sense. As set out above in paragraph 1.2.7, we have identified other means of addressing our concerns should the Modifications set out in the SoCG [SCG 008] be considered to be unsound.

17) Are the other proposed modifications to Policy 1, the reasoned justification and the Key Diagram necessary for soundness? Are any other modifications necessary?

2.2 Should the proposed Modifications in the SoCG [SCG 008] not be considered Sound, we would refer to our original objections set out in our latter dated July 2019.

2.3 Given the importance of cultural venues and the visitor economy to the City, as reflected in Objectives 3, 4 and 10 and the inclusion of Strategic Cultural Areas on the Key Diagram (Figure 7), it is our view that the Key Diagram would be improved by the addition of Lord's as one of the City of Westminster's most important cultural assets and London's foremost sporting venues. Although not necessary for soundness, this would improve clarity of the Plan and make clear WCC's commitment to promoting and enhancing its venues of national and international importance.

3. Response to Main Matter 5 – Economy and Employment

Policy 16

13) Is the approach to the provision of new arts and cultural uses and the protection of existing uses justified? Is it sufficiently flexible?

- 3.1. Having regard to the modifications proposed as part of the Statement of Common Ground agreed between WCC and MCC (SCG 008) and Modification PS/EE/02, we are pleased to note that Policy 16 now makes a distinction between an existing use such as Lord's and proposals for new uses. It is our reading of the change that the criteria set out in Clause B specifically relates to proposals for new arts and cultural uses and not to Lord's.
- 3.2 While the proposed modifications have added flexibility to the policy and the approach is supported by MCC on the basis of SCG 008, we would suggest that uses of cultural significance are defined within the glossary to clarify the wording in the Local Plan and paragraph 16.2 in particular.

16) Are the proposed modifications necessary for soundness? Are any other modifications necessary?

- 3.3 The modifications proposed, in particular Modification PS/EE/02, are necessary for soundness and indeed without the inclusion of PS/EE/02 the policy fails to plan positively and risks irrelevance when proposals for development at Lord's come forward, contrary to paragraph 35 of the NPPF as referenced in paragraph 1.2.4 above.
- 3.4 Paragraph 92 of the NPPF further states that planning policies should plan positively for the provision and use of sports venues and ensure that established venues are able to develop and modernise, as referenced in paragraph 1.2.5 of this Statement. Given the international reputation of Lord's as the home of cricket and its unrivalled historical and cultural significance within the game, it is our view that while the suggested modifications to the policy will ensure Lord's is able to develop and modernise, we would suggest an addition to the glossary of 'Uses of International and/

or National Importance' as referenced in Policy 1, Clause 5 to clarify its application in the Local Plan, as set out in paragraph 1.2.7 above.