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Mill Hill Preservation Society The Studio, Mote End, Nan Clark's Lane, Mill Hill, London NW7 4HH
tel & fax: 0208 906 0769 e-mail: contact@mhps.org.uk web: www.mhps.org.uk Registered Charity No. 212993
Patron: Lady Hobson MBE JP President: David Welch MA FCIS Chair: John Living AAdip CMdip RIBA

Mr Kevin Waters – Planning Officer

Planning, Housing and Regeneration Service
Building 4, North London Business Park
Oakleigh Road South
London N11 1NP

24th October 2011

JL /jl / Copthall – sar – planning - drft 5

Dear Mr Waters

Town and Country Planning Act 1990 H/00928/11

Site: Barnet Copthall Stadium, Greenlands Lane, London W4 1RL

Proposal: The erection of a community sports stadium (under Class D2 of the Town & Country Planning (Use Classes) Order 1987 (as amended) by Saracens RFC items (i) to (xii) together with a revised environmental statement, amended plans and other additional information.

INTRODUCTION

The Mill Hill Preservation Society (MHPS) has consistently supported the principle of protecting the Green Belt, as has the Council in all its published development plans over the years. We have entered fully into the consultation process with Saracens, and studied their revised planning submission in some detail. The Saracens team came to the Studio to give a submission on the revised application to our Committee. This letter is to be read in conjunction with our previous report of 5th May 2011.

EXECUTIVE SUMMARY

The applicants for this proposal formally accept that it intensifies development on the stadium site and that it *prima facie* contravenes PPG2. However, they have sought to minimise possible harm to the Green Belt in a number of ways that we allude to below. Notwithstanding the improvements in the revised application and the associated benefits of the proposals, MHPS shares the applicant's opinion that it contravenes PPG2. We believe that this proposal should be determined by careful evaluation of all the considerations listed below, taking into account relevant planning decisions in comparable circumstances in other parts of the country.

THE NEW BUILDINGS

Whether the North and South stands are 'temporary buildings' is not significant as they are only in-situ for the rugby season and are removed for the athletics season. These stands are quite small and, as such, maintain the openness of the stadium. The layout of the uncovered temporary seating in front of the existing West stand is an improvement as it keeps the stadium more open and the existing stand behind is fully utilised in the design all year round. Any design for a rugby stadium and athletics track involves compromise, as rugby supporters wish to be close to the players on the pitch. In this case the relationship between the existing West Stand and the running track dictates that the 'temporary' stands on the North and South sides are limited in their seating capacity. The implication is that the new East Stand holds more than half of the seating and therefore is larger. There is nothing that can be done about this.



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The new East stand now has a slim fascia and will have electronic information incorporated on match days. This is much more acceptable than the previous design. The 'end glazing' to the seating areas has been changed to have a vertical emphasis which is less likely to stand out from a distance. Similarly the seating colours have been changed and will meld into the background. The omission of the roof structure over the stand has brought down the overall height to a more acceptable level. We believe with the introduction of more trees the East stand is better screened with landscape when viewed from the south and the east. Overall the design of the stand is carefully considered and building materials are sympathetic.

ATHLETICS IN SUMMER

Whilst we previously had reservations about the athletics facilities proposed, further consultation has led us to the view that the facilities will be of a high standard and an improvement on what is there now, with a clear strategy for on-going future upkeep. Sport England, UK Athletics, Barnet & District AC and Shaftesbury Barnet Harriers have all come out in favour of the proposals and we accept their judgement.

TRANSPORT ISSUES

1. The new submission includes quite a different transport plan which we have studied. PPG13 requires that development of the type proposed should offer a realistic choice of access by public transport, walking and cycling as well as by car. The new transport plan succeeds in doing this and the table below gives the anticipated modal split between various forms of transport. There is still the provision of a few satellite car parks, but these will be for only some 500 cars distributed through 4 or 5 locations and the anticipated remainder will be parked in the existing car parks at the stadium. The strategy of using long distance coaches, parked on site, to bring fans from further afield and the use of 'hopper busses' to bring people from local tube and rail stations seems sensible.

Saracens anticipated Modes of Travel to the Stadium are:

Car drivers	12% (with a 3.0 car occupancy level)
Car passengers	24% (giving a modal split by car of 36%*)
Taxi	3%
Walk	5%
Cycle	3%
Motor Cycle	2%
Coach	13%
Bus	5.5%
Undergrounds	19%
Overground	13.5%
Total	100%

*Interestingly, in the Barnet FC Decision 1999 the Modal Split was proposed at 40% by car with an occupancy rate of 3.0 – and this was agreed by the London Borough of Barnet as acceptable for traffic using the stadium on local and major roads.



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2. Some thought seems to have been given to how service traffic will be dealt with and these issues have all been provided for, with most supplies being delivered before match days.
3. The situation when the stadium is used for Athletics has also been considered and it is estimated that the crowd for athletics will not be more than 2,000 people. These people will travel on various modes of transport and will not all represent car journeys.
4. When the stadium is in rugby mode there is going to be an increase – admittedly over a smaller area than first envisaged – of pedestrian movements from satellite car parks, tube and railway stations to the stadium. This extra movement may cause unnecessary stress and inconvenience to local people but evidence from other rugby grounds seems to be that this is not likely to be significant.
5. In spite of the above items transport and traffic remain difficult areas. The new proposals acknowledge that there will need to be some control of parking in local streets to avoid a 'free for all'. We see this an attempt to enforce the requirements of PPG13. A Saracens Matchday Parking Control Scheme (SMPCS), based on introducing appropriate legal controls on parking across a wide area around the site, will be designed in consultation with each of six identified local residential communities so as to ensure that they are secure from unwanted parking without being put to undue inconvenience or cost.

These proposals will be selected from two options:

- General yellow-line restrictions of off-site parking during appropriate parts of the days on which Major Events are held at the Stadium; or
- A CPZ limiting on-street parking within the local roads around the stadium to residents and their visitors (in accordance with permits to be issued by the Council) during appropriate parts of the days on which Major Events are held at the Stadium.

In either case the extra signs and yellow lining will adversely change the character of the surrounding roads. All enforcement will be undertaken by LBB in accordance with the relevant orders and on the basis of the LBB exercising proper statutory discretion. These proposals seem necessary and are what the Society noted in our letter dated 5th May 2011. It should also be noted that this is something of a 'U-turn' on the original application which stated a CPZ would not happen.

INAPPROPRIATE DEVELOPMENT IN THE GREEN BELT

This is for the Society the area of most concern. The applicant's Environmental Statement Volume 1 (March 2011) fully explores the situation in respect of the Green Belt issues in respect of PPG2 and in Clause 6.2.7 states ..."The development proposed does therefore constitute "inappropriate development" in the Green Belt and could therefore only be approved where 'very special circumstances' have been demonstrated."



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The revised application puts the case for Saracens having explored alternative options for locating their new 'home' much more clearly than the original one – including details of some 8 ground sharing opportunities with other clubs, 8 new build stadia and even the possibility of using the Olympic Stadium when the games have finished. In addition many other locations have been considered and are documented, but all have been dismissed for one reason or another.

The actual argument in respect of 'very special circumstances' is set out in Saracens' Planning Statement. It will be for the Planning Authorities to decide if these arguments are sufficient to justify 'very special circumstances' as required by PPG 2.

Whilst the scheme does not comply with Green Belt legislation, clause 3.2 of PPG2 states... "it is for the applicant to show why permission should be granted".

The following points are taken from MHPS consultation with Saracens, from newspaper articles, advertisements, the new revised application, and Saracens own web site. Not all are planning issues but together they provide associated benefits to the application:

- the revival of an old stadium facility returning it to a high class sports venue
- providing a secure base for Shaftesbury Barnet Harriers
- providing a secure base for Barnet & District AC
- a brand new 100m x 16m indoor training area
- a genuine 'community' sports stadium
- an athletics venue available to the people of Mill Hill 340 days per year
- free use for schools in the London Borough of Barnet
- the Saracens Foundation engaging with youngsters
- a base for disabled sportspeople
- enhancing the green belt and protecting from further incursions
- there will be no cost to the council tax payer
- a home for Saracens bringing top quality rugby to this part of London
- a limited number of matches a year
- a travel plan that will bring income to Barnet schools
- no pop concerts and other similar events
- no professional football
- a working Stadium Management Plan
- an Estate Management Plan to look after all sports at Copthall
- If Saracens leave they will leave behind a top quality athletics stadium
- Saracens might claim this will be the best offer Copthall ever gets

All these are serious points worthy of consideration. It will be for the Planning Authorities to decide, as required by PPG 2, if these points are sufficient to compensate for any potential harm to the Green Belt caused by the proposals.

... making change worthwhile



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OTHER ISSUES

Supplementary to the above points, there are a few important issues that we wish to mention:

- a.** We think the lease should be limited to allow no concerts and no professional football, or semi-professional football.
- b.** There are many other activities suggested for the site - all non-conforming in the Green Belt – café, restaurant, bars, a shop, offices, conference facilities and so forth, and these should be rigorously controlled.
- c.** We are especially concerned that advertising and signage will be robustly controlled in this Green Belt location.
- d.** We had issues with the proposed new floodlights, but the new configuration seems much better, with the main light towers facing away from the Observatory and the other stadium lights under the East stand roof with limited spread. Our original comments no longer apply.
- e.** We believed the curfew on floodlights should be 10.00 pm. The new application states 10.30 pm as shut down time and after discussion we feel this is acceptable.

The Society has set out its overall view in the 'executive summary'. One fundamental issue is that the stadium already exists and to a certain extent the Green Belt is already compromised. All the points MHPS has raised with the Applicant and in our previous letter to the Planning Authority have been by way of a 'damage limitation' exercise. In the face of other local sporting facilities disappearing, and nothing coming from the Council to ameliorate these losses, the revised application would appear to be a positive contribution to sport in the locality and the Borough.

In the event that this planning application is approved, MHPS will expect the applicant to be bound through planning conditions and a 106 Agreement to deliver all the community benefits that have been offered as part of the planning approval package, and for them to be rigidly enforced.

We would appreciate our submission being carefully considered and included in the officers' report given to the Planning Committee before their final decision is made.

Sincerely

John Living

John Living
Chair: MHPS

On behalf of the Committee of the Mill Hill Preservation Society