

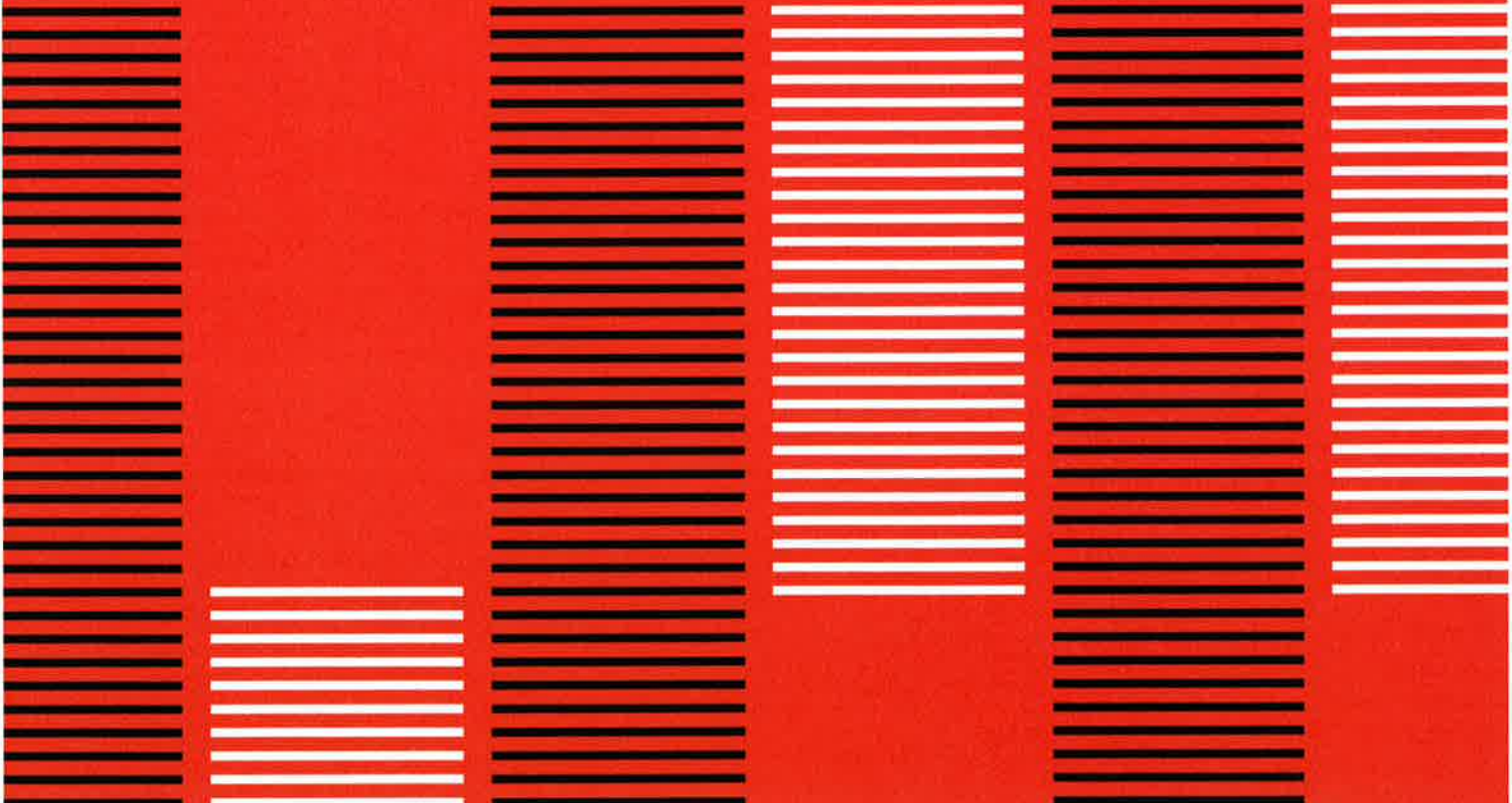
The London Planning Practice Ltd

Core Stategy Development Plan Document
Examination in Public 2011

Statement by Millwall Football Club

January 2011

Matter 1/9



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1 KSS Project Viability Report

1 INTRODUCTION

- 1.1 This statement is submitted in respect of the Core Strategy, Development Plan Document – Proposed Submission Version for the London Borough of Lewisham.
- 1.2 The evaluation of this Core Strategy will be based on the ‘soundness’ of the plan in relation to the tests identified within “Local Development Frameworks Examining Development Plan Documents: Soundness Guidance July 2008’.
- 1.3 Millwall Football Club lies within the London Borough of Lewisham; the Football Club is a major and important facility for Lewisham as a whole, it is part of the local community with a large and active fan base.
- 1.4 The policies within the plan will have a bearing on how the club operates in the future and the development of any land assets in which the club has an interest.
- 1.5 This statement therefore sets out a review of the planning policies within the Core Strategy and an assessment of the soundness of the plan in relation to these policies.
- 1.6 Recommendations are made in relation to the changes required to make the plan sound.
- 1.7 The context of the proposals is defined within this document as follows:
 - Core Strategy Considerations
 - Recommended Changes

2 PLANNING POLICY FRAMEWORK

2.1 Section 20 (5) of the Planning and Compulsory Purchase Act 2004 requires that the purpose of an examination is to determine in respect of a development plan:

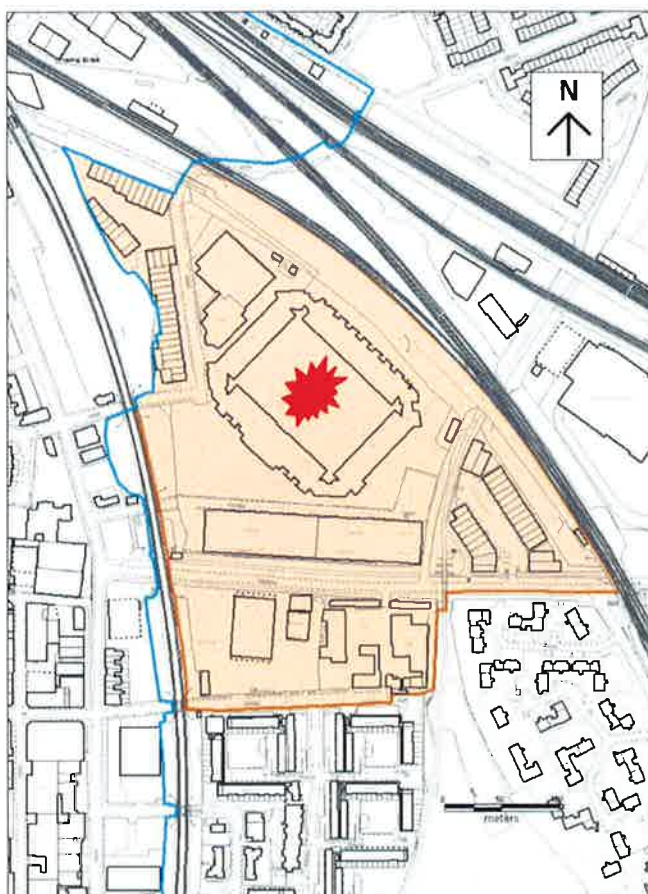
- *“Whether it satisfies the requirements of sections 19 and 24 (1), regulations under section 17 (7) and any regulations under section 36 relating to the preparation of development plan documents;*
- *Whether it is sound.”*

2.2 The test of soundness is provided within the Local Development Framework soundness guidance August 2009 and PPS12 (para 4.52) which states that a core strategy should be:

- I. Justified
- II. Effective
- III. Consistent with national policy

3 CONSIDERATIONS

- 3.1 Millwall Rovers were formed in 1885 by the workers at Mortons Jam Factory on the Isle of Dogs. The club initially used 4 separate grounds on the Island before changing its name, via Millwall Athletic to Millwall and moving to 'the Den', Cold Blow Lane, New Cross in 1910. They remained here for 83 years, until moving to their sixth and current ground, The New Den on 4 August 1993, which is now known simply as The Den.
- 3.2 Millwall Football Club now sits within 'Strategic Site Allocation 3 – The Surrey Canal Triangle as identified on page 137 of the Core Strategy Submission Draft. A map of the area included is shown below with the stadium indicated;



- 3.3 Strategic Site Allocation 3 (SSA3) (1) allocates the whole of the Surrey Key Triangle Area of Mixed Use Development. The policy notes that the Council

will require a phased approach to redevelopment in line with an approved Masterplan that delivers a number of specified priorities.

3.4 The club is fully supportive of the overall aspiration to regenerate and upgrade the Surrey Canal Triangle Area. However the club believes that some of the current and future needs of the club need to be more fully recognised. It is also considered that the significance of the club in the local community is sufficiently acknowledged. Unless the policy reflects the club aspiration then the long term future of the club in its current location could be prejudiced.

3.5 The below section sets out where the club consider amendments should be made to the policy as currently drafted, relevant priority is identified, discussed and then a suggested wording is given.

Proposed Policy:

3.6 SSA 3; Priority 1a: *"A new 'destination' development that capitalises on the opportunities presented by Millwall Stadium ensuring that the existing football and sports facilities are enhanced and made accessible to the public including appropriate supporting uses in support of this aim"*.

Discussion:

3.7 Millwall Football Club supports the aspiration that the development of the Surrey Canal site should focus on the existing presence of the stadium and its involvement with the local community. However this focus must allow the club to also develop and expand on a sound and sustainable basis over the period of the plan.

3.8 At present there is a real danger that any forthcoming master plan would not fully put forward aspirations for the improvement of the existing football club and sports facilities.

3.9 To be an economically viable entity the club must employ a number of interlinking football and economic development strategies, either all at once, one at a time or incrementally, dependent upon the circumstances.

3.10 These strategies include the following;

- A successful football team, to assist in increasing fan base and therefore enhancing match day income, commercial sponsorship and television payments to the club.
- Maximising other match day revenue streams through the use of other facilities at the stadium, including hospitality, function and leisure space.
- Maximising non-match day and non-football based income by exploiting existing stadium and club facilities and exploring new development opportunities to provide new and enhanced revenue streams / income for the wider benefit of the club.
- Developing any assets that the club have interests in for greater commercial gain.

3.11 In order to examine its future needs Millwall FC have carried out a feasibility into the upgrading and expansion of the stadium. This expansion would allow for an increase in stadium capacity from approximately 20,000 to approximately 28,000 as well as improving the stadium in general, improving office facilities, providing car parking facilities, creating a range of community facilities and reconfiguring and upgrading hospitality facilities.

3.12 The ability of the football club to expand and upgrade its stadium is key to its long term future and the club is concerned that this is not adequately recognised in the current wording of the policy. Therefore the club suggests that the policy is re-worded to ensure that it is effective in facilitating the regeneration of the area in tandem with the retention of Millwall FC at its heart to ensure the club can remain as a long term entity.

Suggested Amendment

- 3.13 *“Priority 1a: A new ‘destination’ development that places the opportunities presented by Millwall Stadium at its heart. Any proposed masterplan must allow for the long term future of the football club and should give consideration to future requirements for stadium expansion and improvement allowing the stadium capacity to increase to a maximum of 30,000 fans. Proposals should take into account the access and egress requirements as well as servicing and transport issues. The proposed masterplan must be produced through extensive consultation with Millwall FC and should seek to enhance the existing football and sports facilities and make these accessible to the public”.*

Proposed Policy

- 3.14 SSA3; Priority 1b: *“provides at least 20% of built floorspace developed on the site (excluding the Millwall Stadium Area) for a mix of business space (B1(c), B2, B8) as appropriate to the site and its wider context”*

Discussion:

- 3.15 The current economic climate is unstable and the future of business uses in general is unknown. Whilst the club does not take issue with the need for an element of business space, there should be some flexibility in the percentage of such space to reflect the uncertainty in demand and economic viability of such development. This should be judged at the time of submission of any planning application. A suggested amendment to the policy as worded is set out below;

Suggested Amendment:

- 3.16 SSA3; Priority 1b: *“provides a target of 20% of built floorspace developed on the site (excluding the Millwall Stadium Area) for a mix of business space (B1(c), B2, B8) as appropriate to the site and its wider context. This provision of floorspace should be informed and qualified by viability studies as part of any application.”*

Proposed Policy

- 3.17 SSA3; Priority 2b: *“The layout will also ensure that Millwall Stadium can continue to function as a mass spectator destination with appropriate access for emergency services and evacuation arrangements and that the disturbance to residents is minimised.”*

Discussion

- 3.18 The clubs concern with this policy links back to the discussion of priority 1a as noted above. If, as the Council state, they wish Millwall Football club to be a key focal point of the regeneration of Surrey Canal Triangle, then more explicit reference should be made to allow for the clubs expansion and long term future. At present this priority as currently worded seeks only to protect the ‘status quo’ which would restrict the clubs ability to operate into the long term and remain within this location especially if the club remains in the Championship League or were it to be promoted to the Premier League
- 3.19 The club are likely to expand within the future and the policy must allow for this expansion in order for it to remain effective.

Suggested Amendments:

- 3.20 Priority 2b: *“The layout will also ensure that Millwall Stadium can continue to function as a mass spectator destination on a long term basis with appropriate access for emergency services and evaluation arrangements. Any proposals must allow for the expansion of the club to a maximum of 30,000 spectators as well as associated improvements, emergency servicing and evacuation requirements. Proposals should also seek to ensure that that the disturbance to residents is minimised.”*

4 CONCLUSIONS

4.1 The club would wish to present its case to the public examination to expand upon the following matters;

- The expansion and reconfiguration of the stadium to accommodate the clubs future needs
- To outline its requirements to ensure its potential expansion is not frustrated either in terms of the need for an expanded stadium or in the associated development on adjacent land to support that expansion (e.g. other leisure and/or sporting uses and/or conference facilities/hotels etc)
- To ensure infrastructure in terms of transportation, security measures and emergency access are adequately understood.

4.2 Returning to the 3 criteria for the test of soundness we would comment as follows; .

“Justified”

4.3 There is clearly a need to accommodate the genuine and justified expectation of the club, especially now it has achieved promotion to the Championship League and given its importance to the local community. The current wording of the proposed policy does not go far enough in acknowledging the clubs contribution and importance nor in allowing for its expansion. To this extent the policy has not been justified by the Council and is required to be so, or, as suggested, be amended.

“Effective”

4.4 The Council have noted that the football club is key to the regeneration and success of the area as a whole and the allocation of the Surrey Canal Triangle for development is strongly supported. However, the currently proposed wording of the policy and supporting text does not adequately or effectively protect the future needs of the club and therefore requires amendment as suggested.

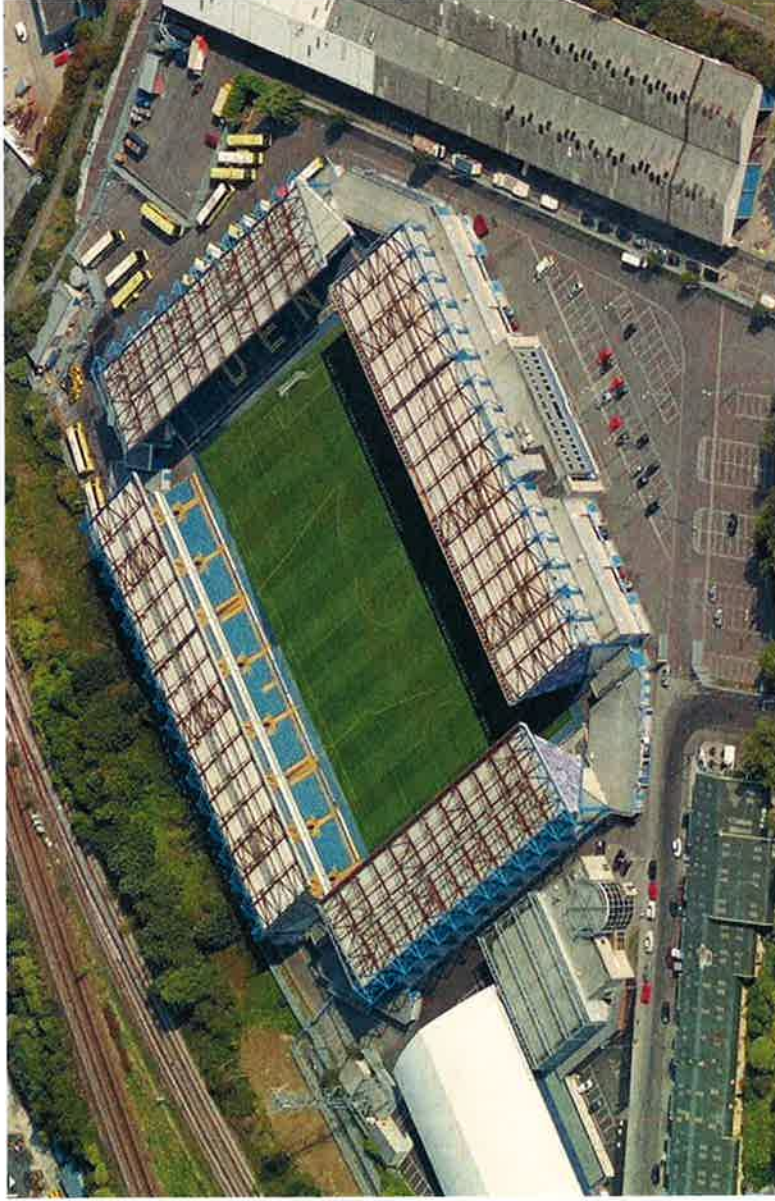
“National Policy”

- 4.5 The need to establish, protect and allow for the expansion of sports facilities is well established at all levels of the planning process. At a national level this is most clearly expressed by PPG 17 which notes at paragraph 11 that “...*sports and recreational facilities that are of high quality or of particular value to a local community should be recognised and given protection by local authorities through appropriate policies*”.
- 4.6 In conclusion the club believes that the proposed policies require alteration in order to comply with the tests as noted above and as set out within section 3 of this statement. The club would be pleased to expand upon its reasoning during the public examination and to assist the Inspector with any queries arising.

Millwall Football Club

Project Viability Report

October 2010



1.0

Introduction

This report is prepared on behalf of Millwall Football Club (MFC) and sets out stadium future proofing options for The Den, Zampa Road, London SE17 as part of a wider regeneration scheme the stadium site and surrounding area being prepared by Trinity Corporate and its consultant team. The future proofing strategy is based on logical stages agreed with Millwall plc and its consultant team and Trinity Corporate and its architect master planner Squire and Partners on 20th September 2010.

The overall aim of the study is to establish a perimeter zone around the stadium within which MFC can sensibly upgrade its overall capacity and facilities for the future, and outside which Trinity and its designers can set new road lines and establish enabling site boundaries. The individual stages are as follows:

Stage 1 - External Cladding Enhancement

Stage 2 - North Stand Offices

Stage 3 - South Stand Fans Facility

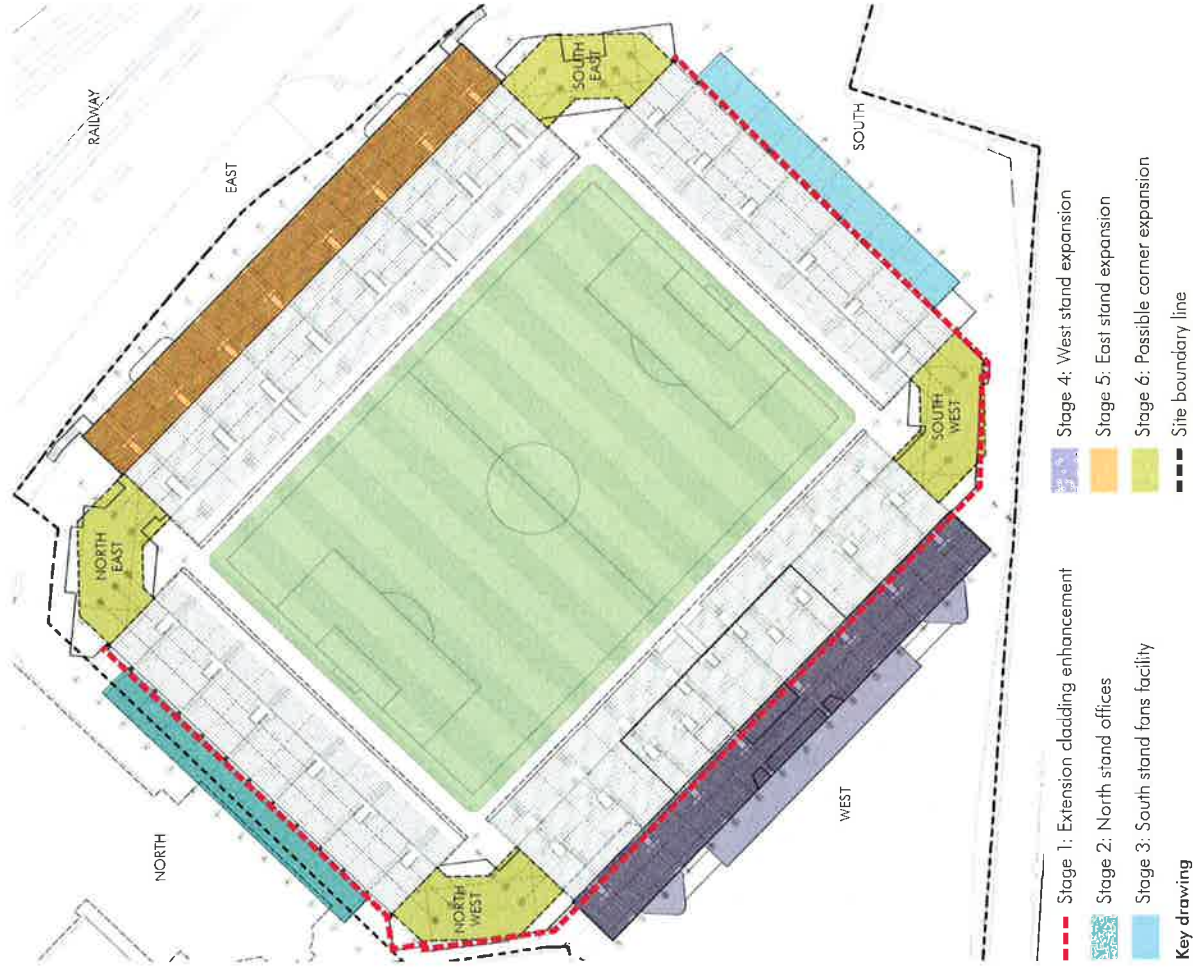
Stage 4 - Stadium Expansion, West Stand

Stage 5 - Stadium Expansion, East Stand

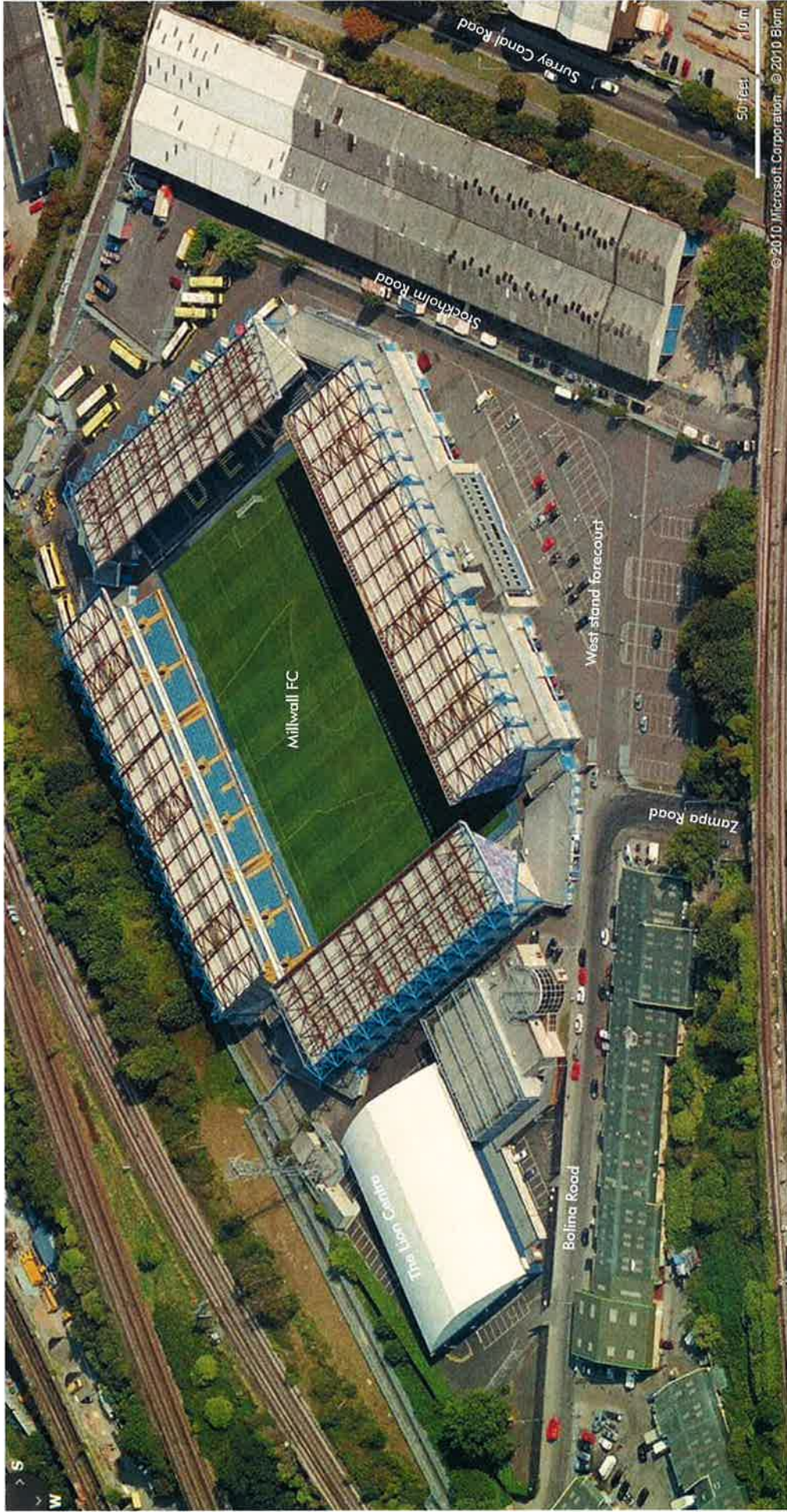
Further consideration could be given to stadium expansion in the four corners but there are complications with this strategy relating to egress from the lower concourses, emergency vehicle access onto the pitch, and pitch ventilation.

In addition to the above, Squire and Partners have been asked to incorporate MFC's requirements for 100 general match day and non match day parking spaces; up to 15 away team coach parking spaces and 1,000sqm outside broadcast vehicle parking into the master plan, and also establish a new location for MFC's pitch plant ground staff equipment store.

All preliminary drawings prepared by KSS are based on pdfs of existing stadium plans and hard copies original structural engineer's drawings provided by Millwall Football Club. Not all internal floor levels were available, and have therefore been created from known information and interpreting site photographs.



Stadium aerial view





West stand facade 1



West stand facade 2



'Arry's Bar - South west corner



North west corner entrance

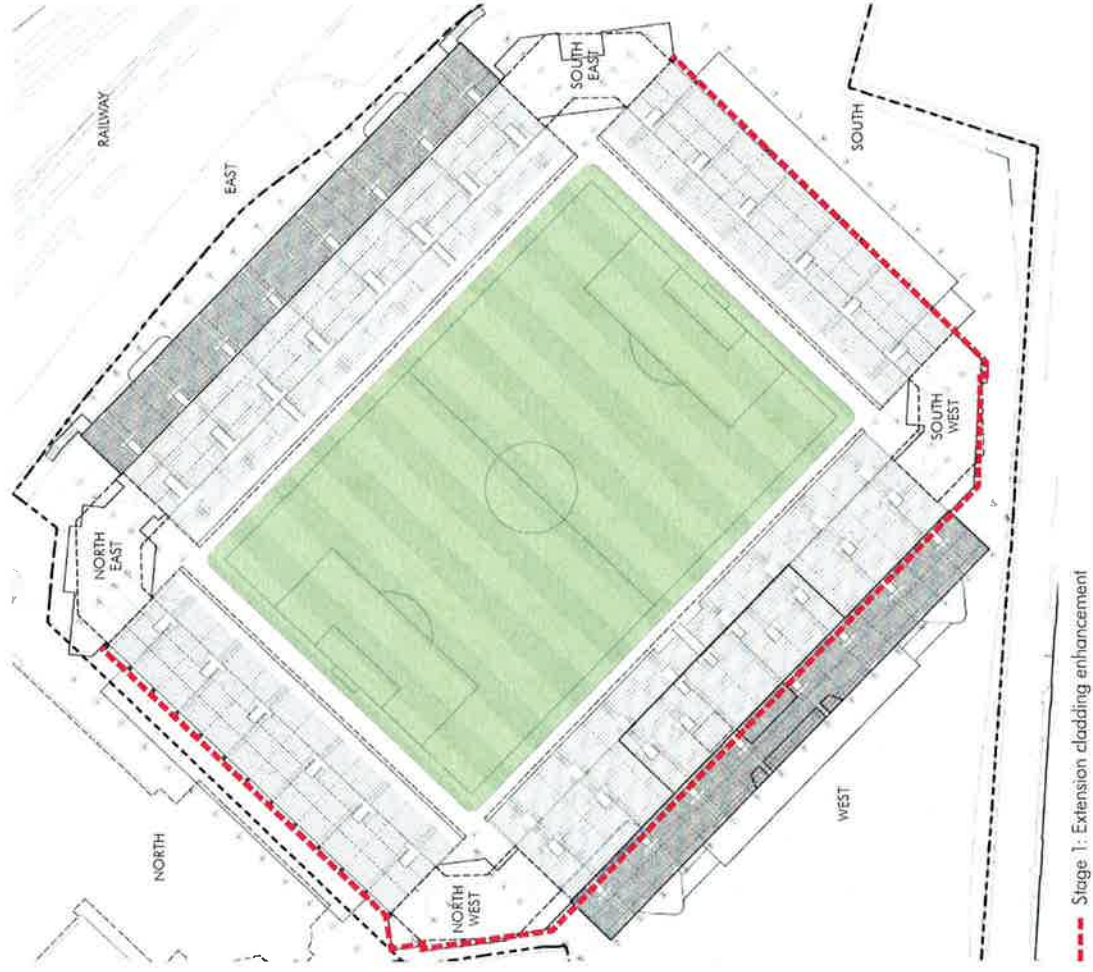
2.0

Stage 1 - External cladding enhancement

The visual appearance of the stadium is functional rather than aesthetically attractive, and it has been agreed that a simple over-cladding of first and second floor facades and exposed structural elements would improve the visual appearance of the stadium when viewed from the proposed residential redevelopment.

The over-cladding would be applied to the main West stand cladding panel facade, and consideration could also be given to providing a new glazed West stand entrance canopy and colour rendering the two West stand concrete block stair cores which frame the main elevation. The cladding might also be continued round to cover the North and South stand exposed steel frame, and possibly the single and two story blocks in the northwest and southwest corners too.

The cladding solution would need to maintain day lighting and ventilation to the West stand internal spaces where necessary. The detailed design could introduce colours, MFC branding and signage, and back lighting could be used to create drama at night. Possible options would be as follows:





Option 1

Bespoke vertical metal "hit and miss" tubes on open metal secondary support framing

Can introduce syncopation or crimping or twisting into tubes to create patterns or branding

Assume multi-coloured polyester powder coated or anodized finish

Possible suppliers - Claydon Architectural Metalwork, Cadlisch



Option 2

Bespoke aluminium expanded mesh panels on open metal secondary support framing

Panels can be set in framing sections and hung in differing orientations to create textures

Anodized finish, possibly multi-coloured

Possible suppliers - James and Taylor (Eyetch), Cadlisch Meshtec



Option 3

Bespoke solid laminate hit or miss plates on open metal secondary support framing

Similar to Barcelona Nou Camp stadium over-clad striking appearance

Possible suppliers - Eternit Lamina or Trespa

West elevation with option 2 cladding enhancement

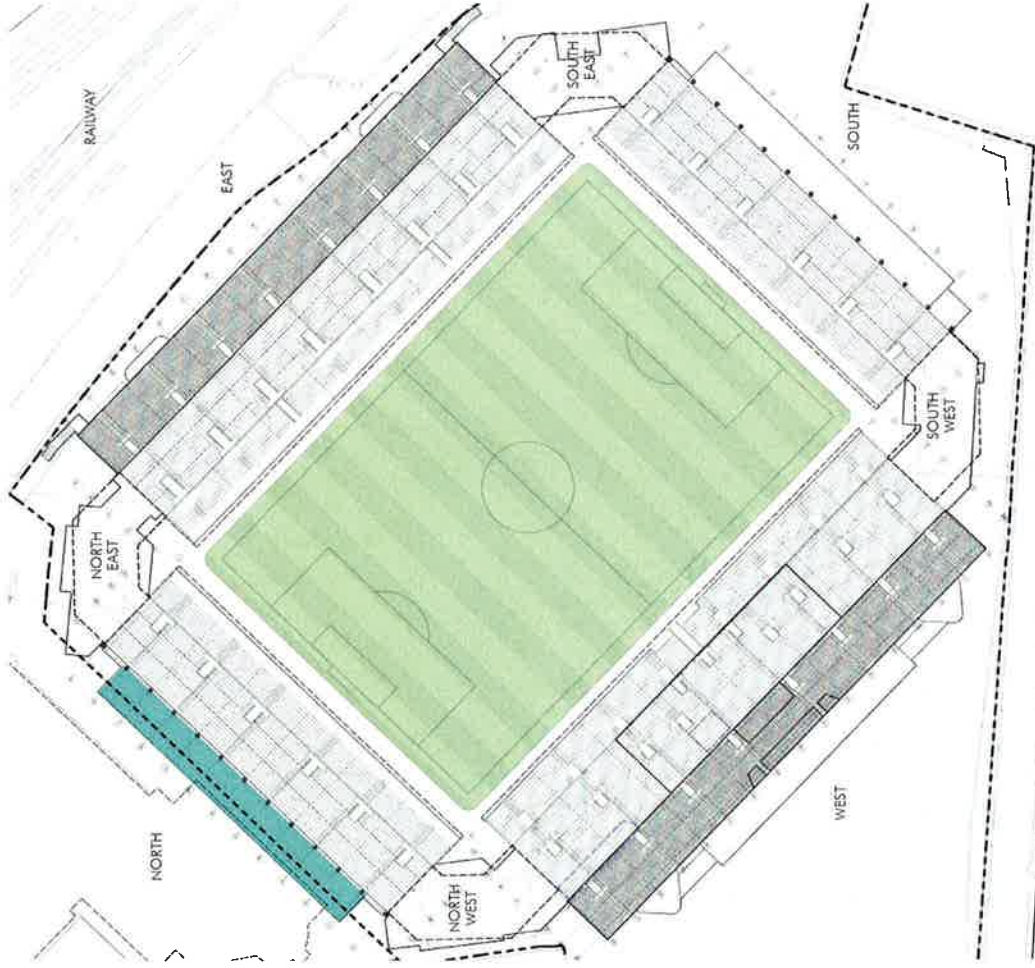
The adjacent list is not exhaustive, and the final choice and specification would need to carefully balance the visual uplift benefits against budget. Given the likely extent of cladding, providing it has to make a difference - if it looks cheap there would be no point in doing it. Trinity and MFC also have to weigh up the possibility that the cladding would be removed if subsequent future proofing stages were implemented.



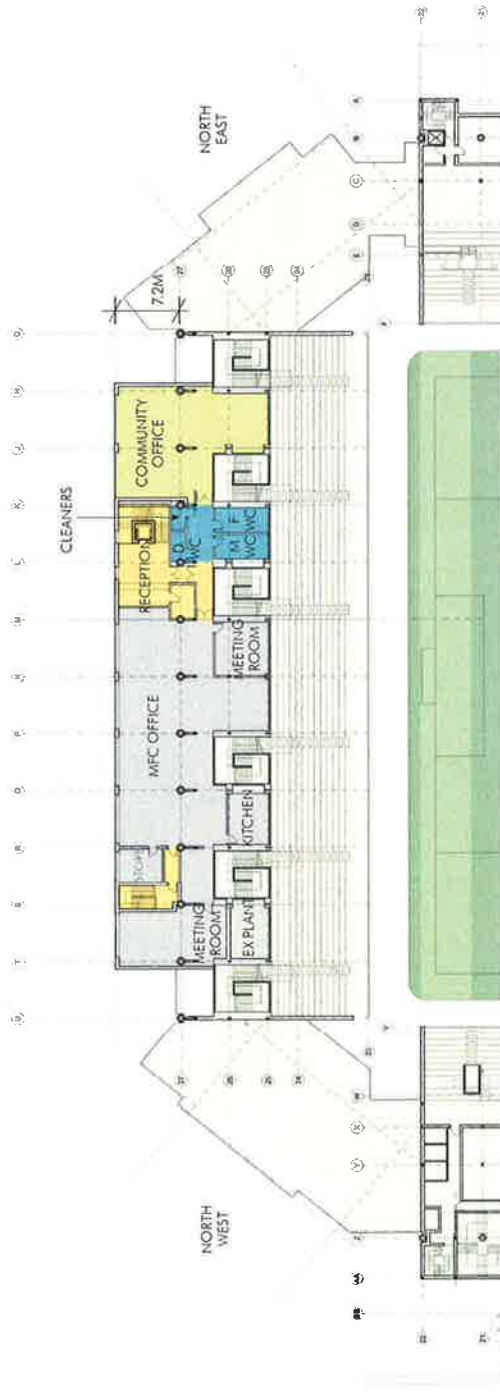
3.0 Stage 2 - North stand offices

The proposed North stand offices would consolidate the existing MFC general and directors' offices in the West stand with existing community office facilities in The Lion Centre into a single facility behind the North stand. Initial thoughts on the proposed accommodation are as follows:

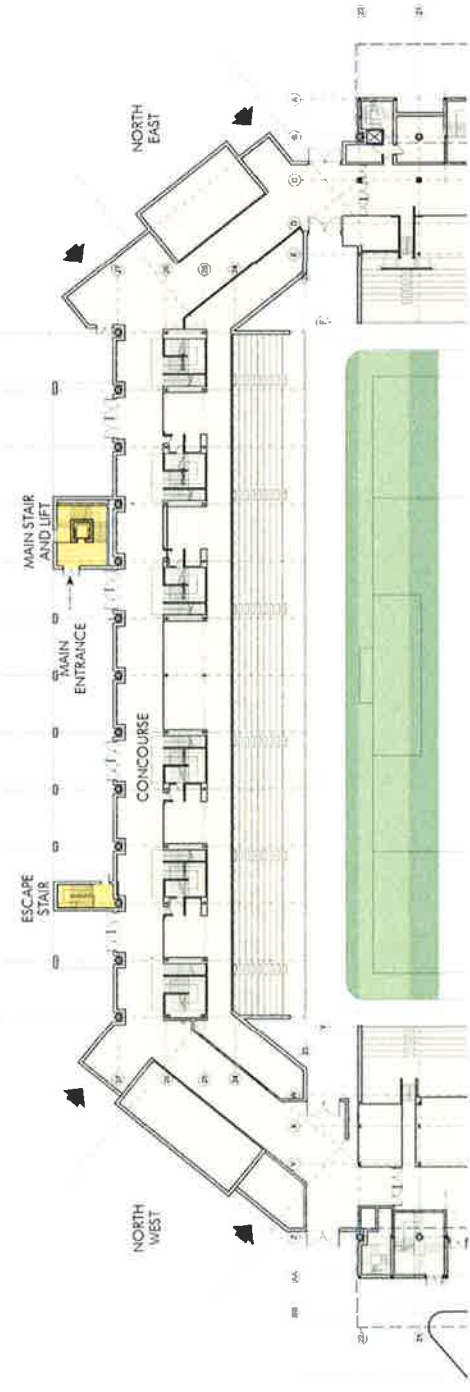
	sqm
Ground floor	
Central entrance, stair and lift	40
Secondary escape stair	20
First floor	
Central stair, lift and reception	40
MFC Office space for 30 people	225
MFC directors' offices and meeting rooms	100
MFC Tea kitchen and break out area	30
Community office space for 20 people	150
Community office tea kitchen	10
Shared male female and accessible toilets	35
Cleaners store and general store	15
Secondary escape stair	20
Plant	35
Total	720



Stage 2: North stand offices



First floor



Ground floor

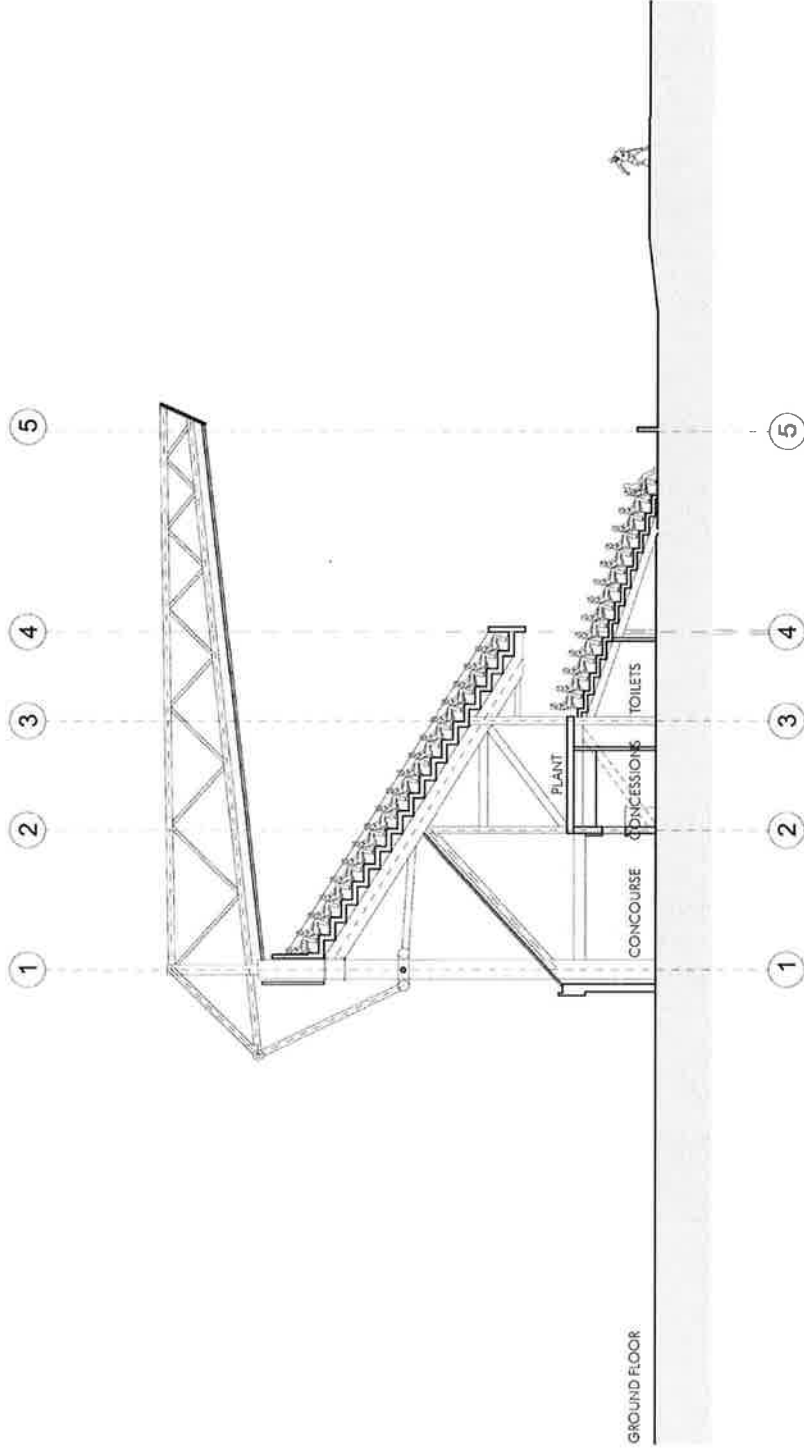
Proposed north stand club and community offices

Design considerations

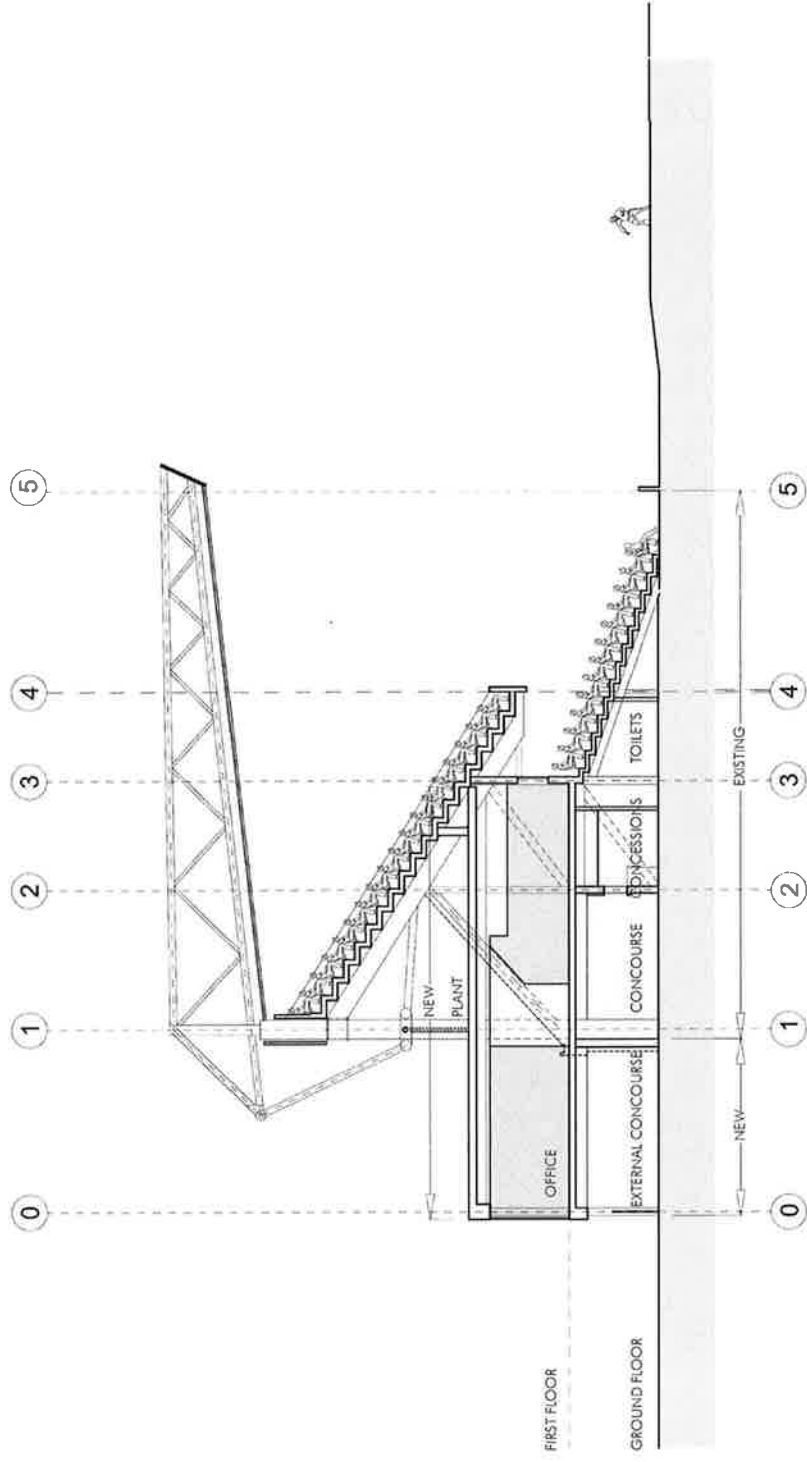
The proposals assume the office space would be on the first floor with access and secondary escape cores down to ground floor. The steel frame would be set out on similar 6.75m centres to the stadium, with a 7.2m wide single bay projection plus footpath width to define the line of the proposed development road.

The first floor office accommodation would be self contained, fully accessible and air conditioned, and the north facing façade could be continuously glazed. The ground floor cores would be positioned to retain the existing North stand lower tier exits, and the proposed office toilets would stack over the stadium toilets if practically possible. Consideration would be given to the use of the stadium stairs for means of escape.





Existing north section

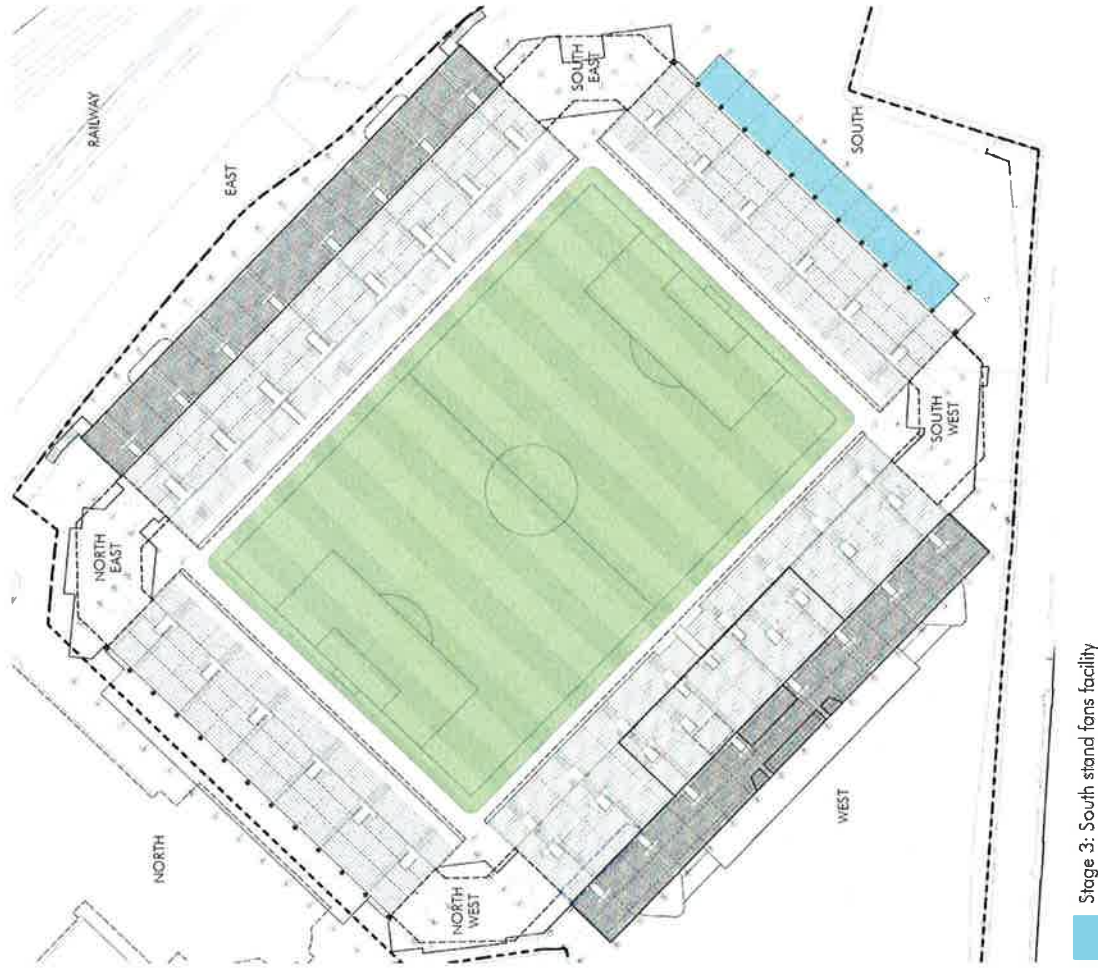


Proposed north section

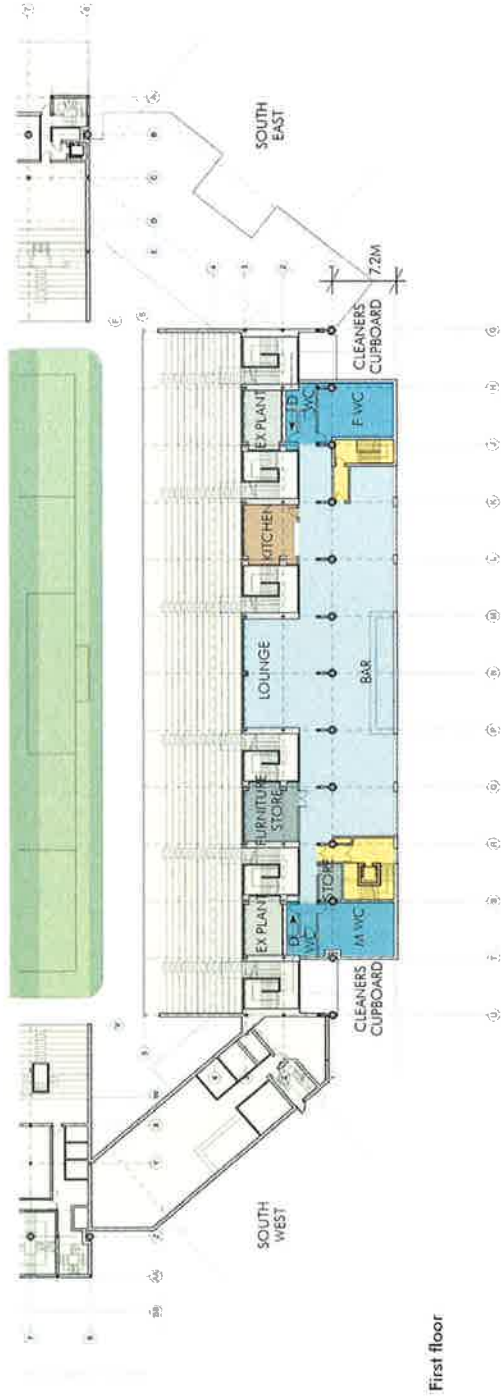
4.0 Stage 3 - South stand fans facility

The proposed South stand fans facility for up to 450 people would augment Arry's bar and become a major focal point for home team fans on match days, and fans and the wider community on non match days. It is assumed the bar facility would be predominantly standing with some seating on match days, and more seating on non match days. Initial thoughts on the proposed accommodation are as follows:

	sqm
Ground floor	
Main entrance, stair and lift	40
Secondary escape stair	20
First floor	
Main stair, lift and reception	40
Lounge bar area	300
Bar and cellar / drinks store	60
Kitchen capable of serving pub style food offer	50
Male female and accessible toilets	80
Furniture store, cleaners store and general store	30
Secondary escape stair	20
Plant	35
Total	675



Stage 3: South stand fans facility

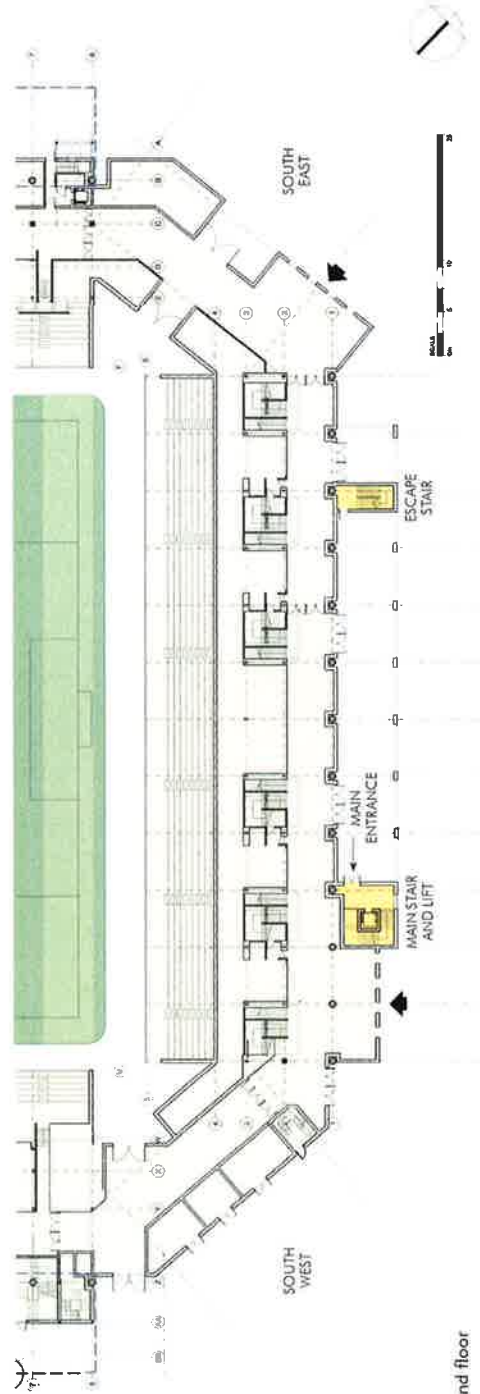


First floor

Design considerations

The proposals assume the office space would be on the first floor with access and secondary escape cores down to ground floor. The steel frame would be set out on similar 6.75m centres to the stadium, with a 7.2m wide single bay projection plus footpath width to define the line of the proposed enabling development.

The first floor accommodation would be self contained, fully accessible and air conditioned, and the south facing façade could be a mix of windows and solid cladding. The ground floor cores would be positioned to retain the existing North stand lower tier exits, and the proposed office toilets would stack over the stadium toilets if practically possible.



Ground floor

Proposed south stand fans bar

5.0 Stadium expansion

MFC have confirmed that they would ideally like to be able to increase the stadium capacity of approx. 20,000 to around 28,000. However, they have identified that current demand is mainly for hospitality facilities linked to well-positioned seating rather than general spectator seating, and there is a groundswell of opinion amongst clubs at a particular level that headline capacity may not as important as revenue generation or providing better facilities for loyal fans.

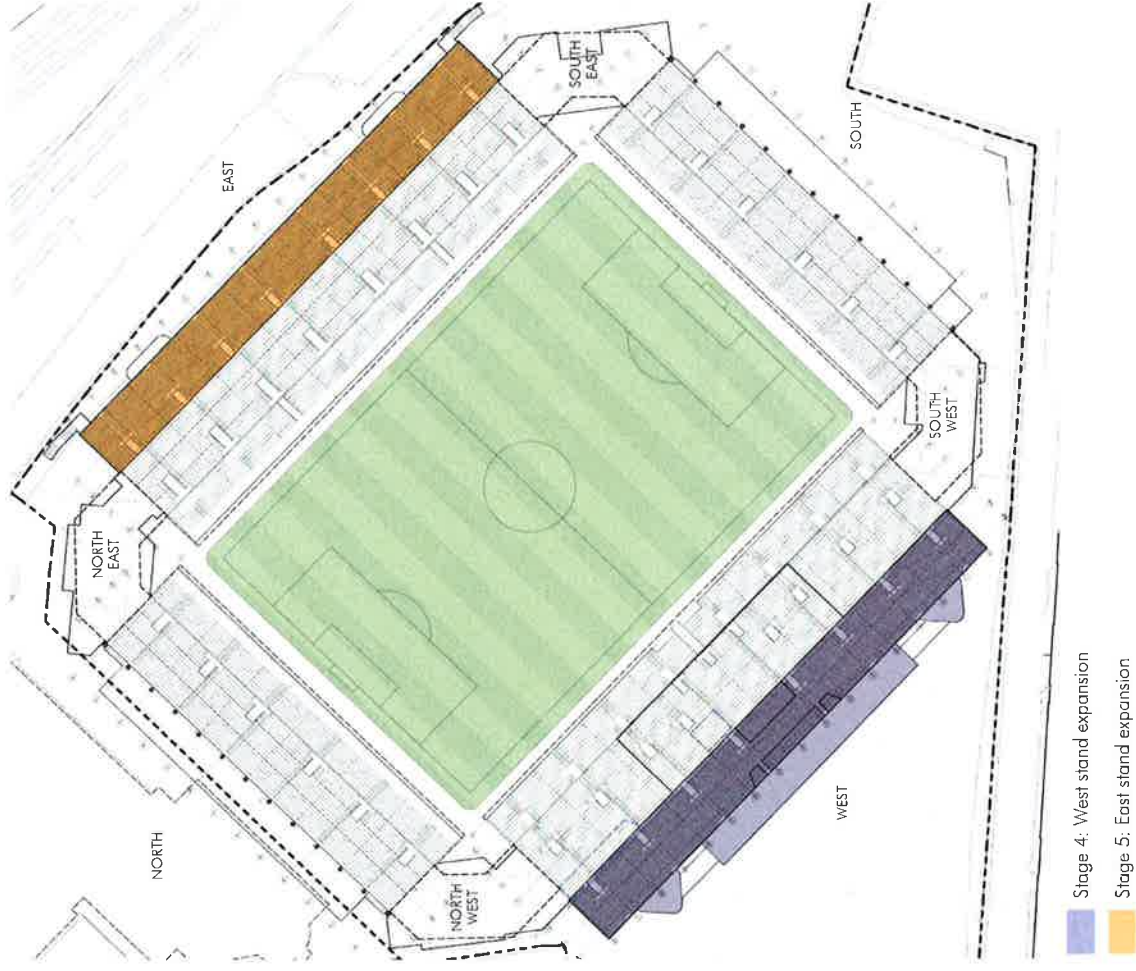
The expansion strategy therefore includes an expansion of the prime West stand to include up to new 3,000 general admission seats plus the establishment of 1,200 hospitality seats with back of house facilities. This would be followed by the expansion of the East stand to include up to 3,000 general admission seats and finally (if required), expansion in the four corners to achieve 2,000 approx. general admission seats.

The West and East stands would be extended out the back rather than along the sides, and covering the extended seating footprint would involve removing the existing stand roof structures and replacing with new. Reconfiguration of the West stand would also necessarily involve the repositioning of the main stadium control room, media working area, television camera platform, and commentator and written press tribunes.

In all options there would be a need to maintain safe access, egress and emergency evacuation in line with the latest Green Guide recommendations. Agreement would also need to be reached with the statutory licensing authority on the appropriate standards for spectator seating and sightlines, given the existing stadium design was based on a previous Green Guide iteration. Emergency vehicle access onto the pitch in the corners would also be maintained.

It has been assumed that away fans would remain located in the North stand upper tier, and that an increased seating provision could if necessary be made available as the stadium capacity increased, in line with the rules of the various competitions.

The reconfiguration works to the West and East stands are extensive and complex, and those to the West stand are potentially disruptive and could require extensive temporary facilities during reconstruction. MFC would need to consider the feasibility, viability and programme implications in detail.



Stage 4: West stand expansion
Stage 5: East stand expansion

6.0 Stage 4 - West stand expansion

Reconfigured hospitality seating and facilities

The centre section of the existing upper tier would be reconfigured to accommodate 1,200 hospitality seats, and the seating centres would be widened from 460mm to 500mm. The outer sections of the West stand upper tier would remain as general admission. The central vomitories could be reconfigured to improve seating layout efficiency, and 4 hospitality wheelchair user viewing positions would need to be provided with super risers to establish unobstructed viewing.

Extended hospitality facilities would be provided to the back of house centre section at first and second floor levels, and the external envelope would be extended approx 8-9m beyond Grid BB. The first floor production kitchen would be reconfigured and possibly extended into Arry's Bar, and a satellite kitchen would be needed to serve the hospitality suites at second floor.

The extended West stand would give the opportunity for a new clearly defined main stadium and hospitality entrance and drop off. New central feature stairs and lifts would be provided for hospitality, and the two inner stair cores currently serving the second floor upper concourse would be reassigned for hospitality access and means of escape. A new goods lifts would also be required to service the new accommodation.

New general admission seating and facilities

The West stand would be extended by up to 18 rows to provide up to 3,000 new general admission seats to the back section of the upper tier. The seat row widths would be set at 760mm (wider than existing 700mm rows), with standard seats @ 460mm centres.

The new seating would be supported by approx 1,100sqm back of house accommodation including a

new 5-600sqm upper concourse on third / fourth floor level plus approx. 300sqm new toilets and 100sqm concessions. Access and egress would be via two new scissor stair cores, each with 3 turnstiles and an access, evacuation and goods lift.

No wheelchair viewing positions would be provided to the new upper tier, but a further 9 additional wheelchair positions would need to be provided within the stadium to comply with FLA "Accessible Stadia" requirements for the 3,000 seat increased capacity.

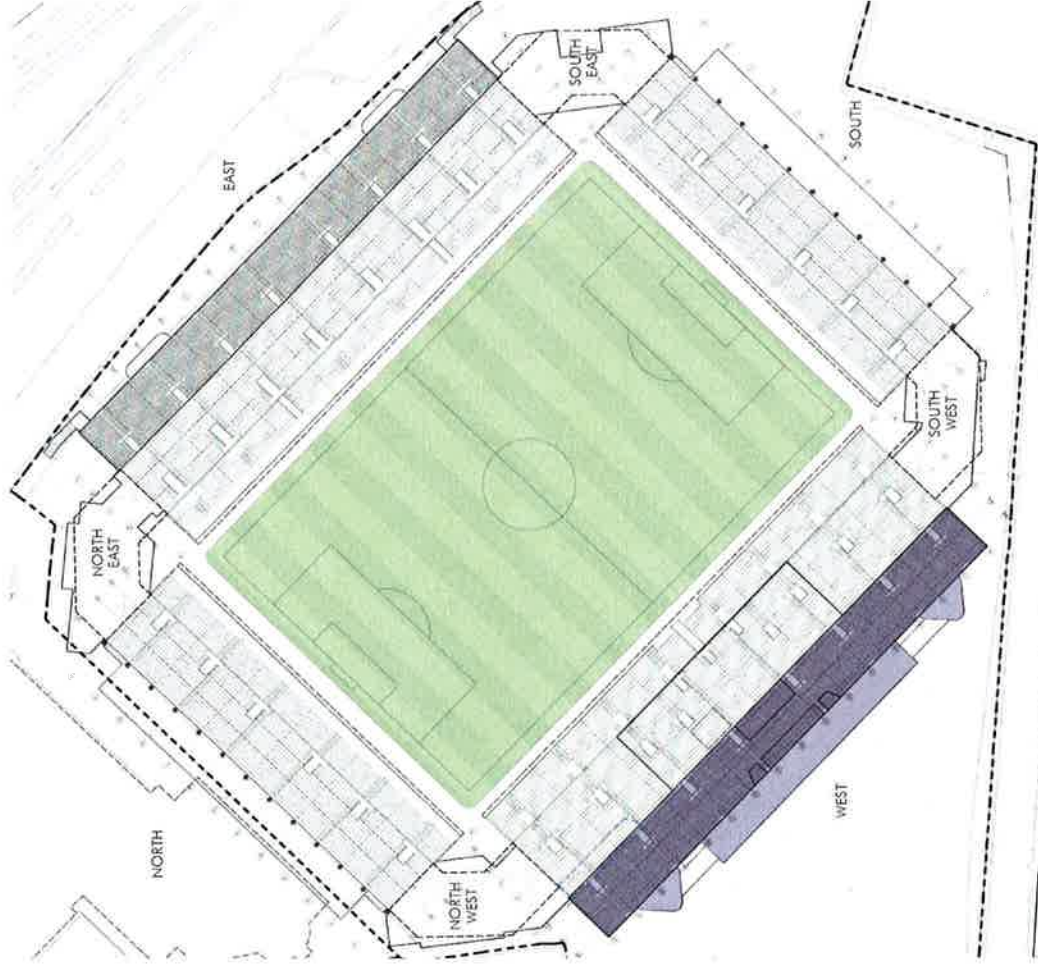
Other reconfigured facilities

The stadium control room would need to be relocated at the back of the stand (possibly suspended from the roof) with a good direct view over the away fans seating in the North stand. The press tribune would best be relocated in the centre front section of the extended upper tier with dedicated access to the press working area and lounge relocated at third floor level.

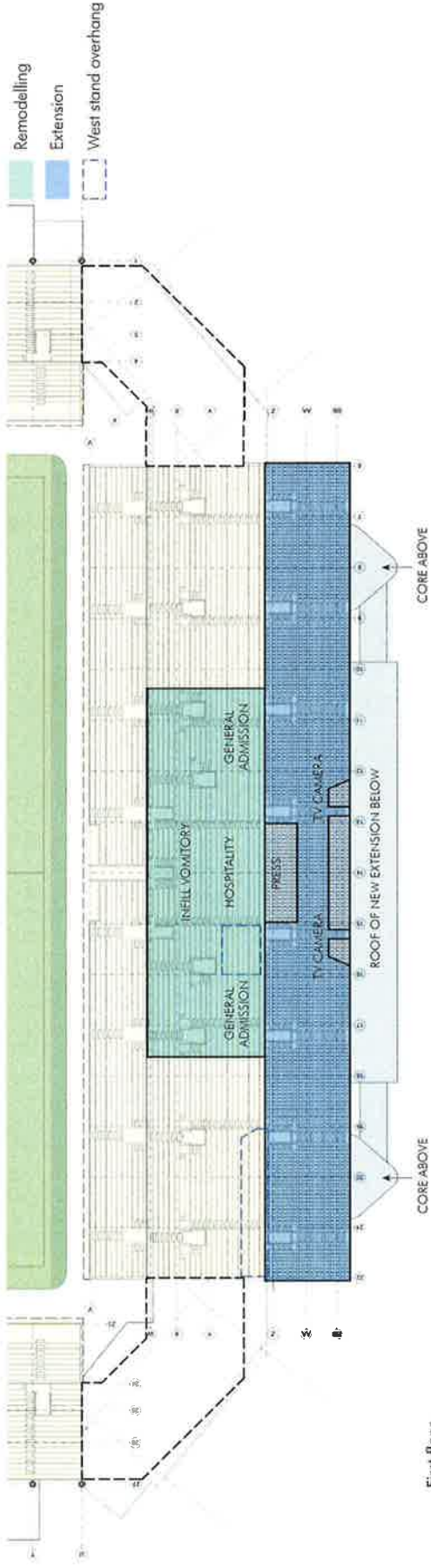
The main television camera platform and commentator positions currently at the centre back of the existing upper tier would best be located at the centre back of the extended upper tier in order to provide clear unobstructed views of the pitch.

External envelope and roof

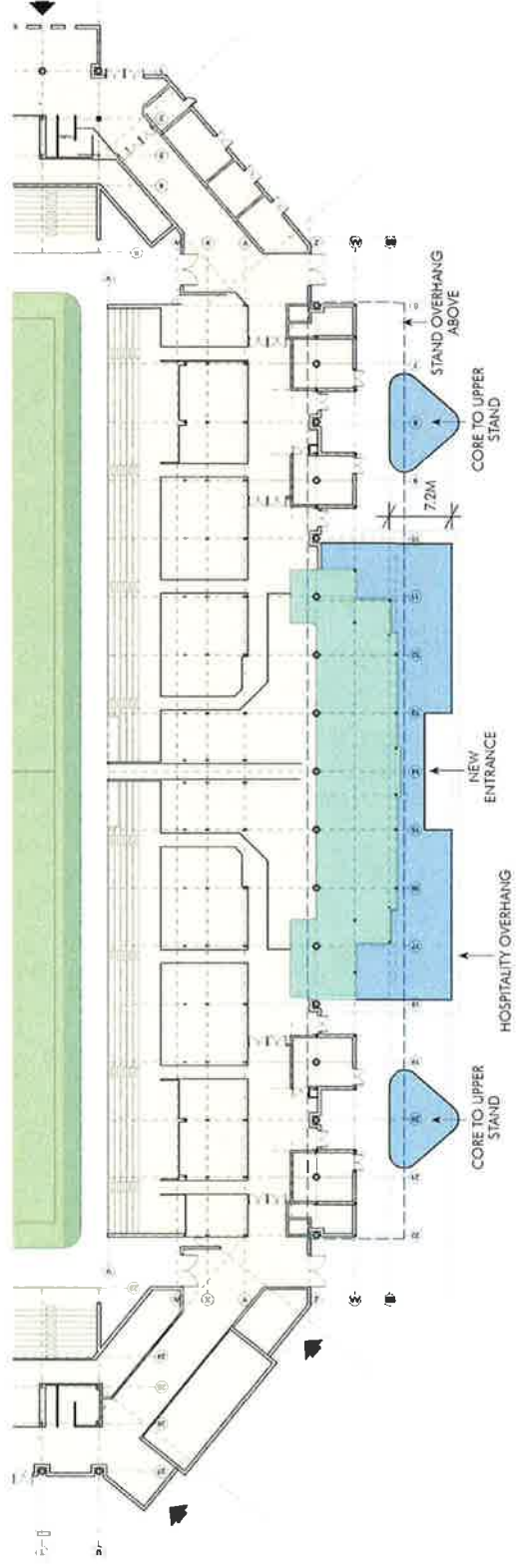
The new hospitality and general spectator accommodation could be enclosed in a higher specification envelope to reinforce the fact that the stand is the premier facility, though the use of extensive facade glazing would be limited by the southwest aspect. The new roof structure and cladding could be broadly designed to be similar to the existing stand to maintain design unity and adapted to suit the larger footprint.



Stage 4: West stand expansion

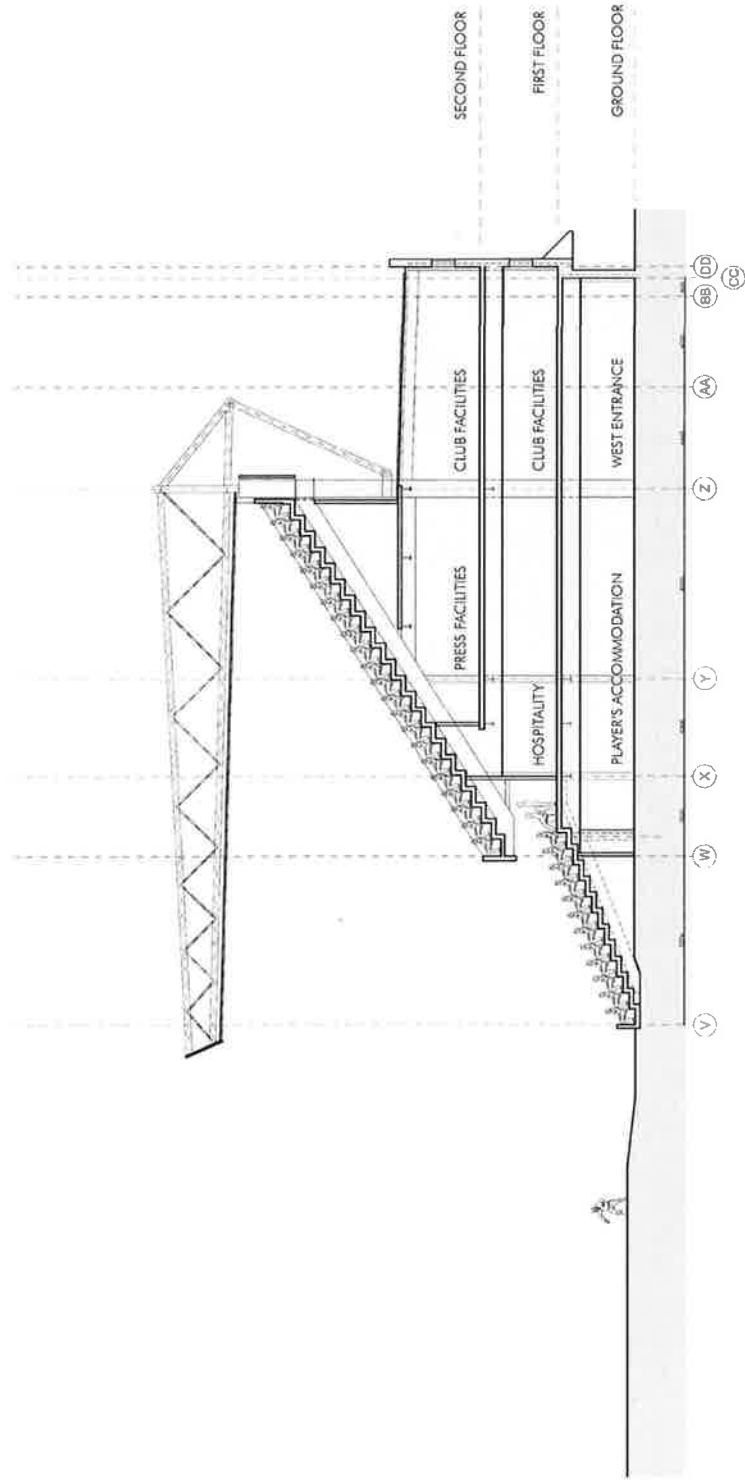


First floor

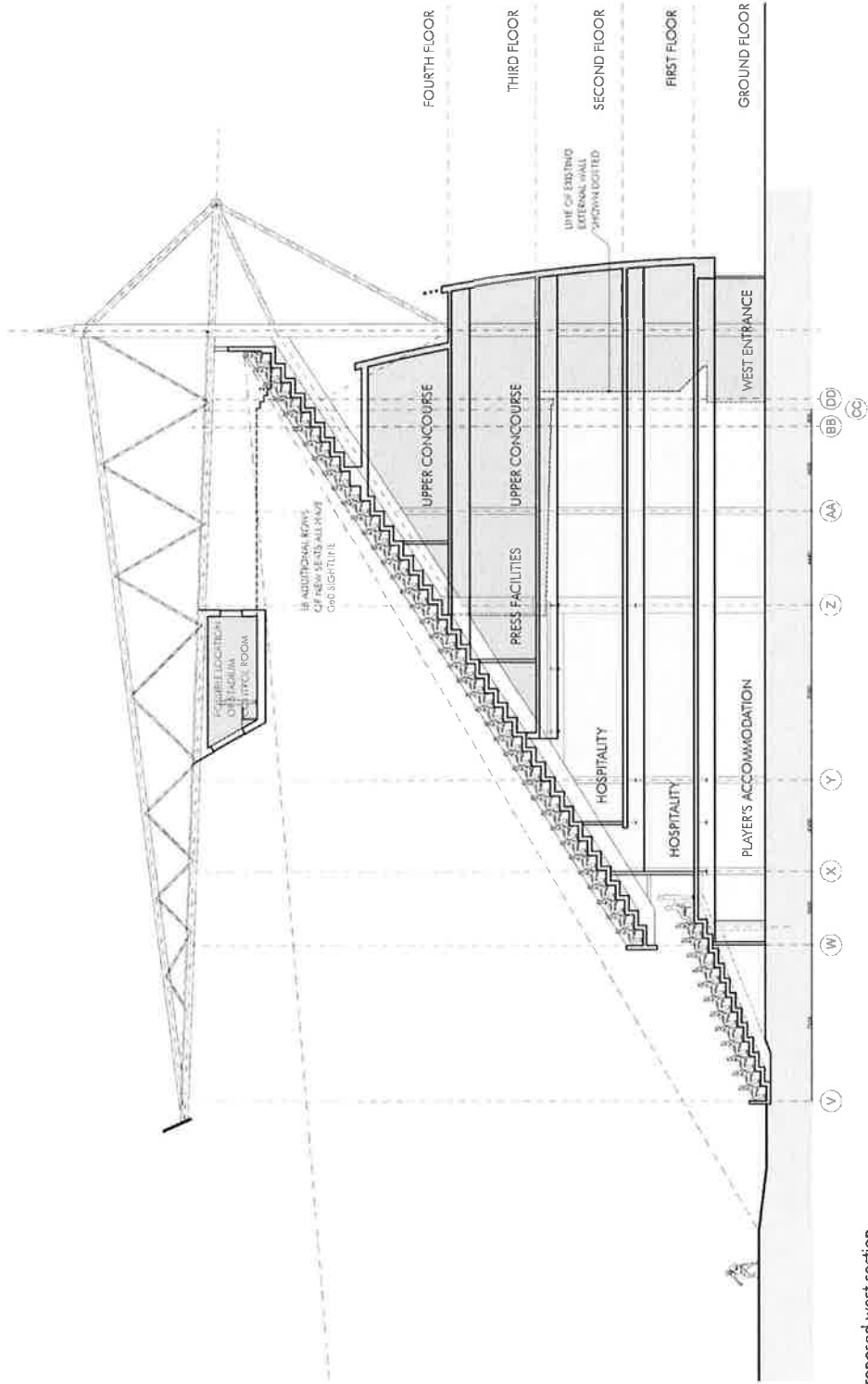


Ground floor

Entrance west stand



Existing west section



Proposed west section

7.0

Stage 5 - East stand expansion

New general admission seating and facilities

The East stand would be extended by up to 18 rows to provide up to 3,000 new general admission seats to the back section of the upper tier. The seat row widths would be set at 760mm (wider than existing 700mm rows), with standard seats @ 460mm centres. The new seating would be supported by approx 1,100sqm back of house accommodation including a new 5-600sqm upper concourse on third floor level plus approx. 300sqm new toilets and 100sqm concessions.

The design of the access, egress and emergency evacuation for the additional seats would be made complicated by the fact there is insufficient space within the site boundary in order to take access cores down to grade without blocking access and egress routes from the existing East stand lower and upper tiers.

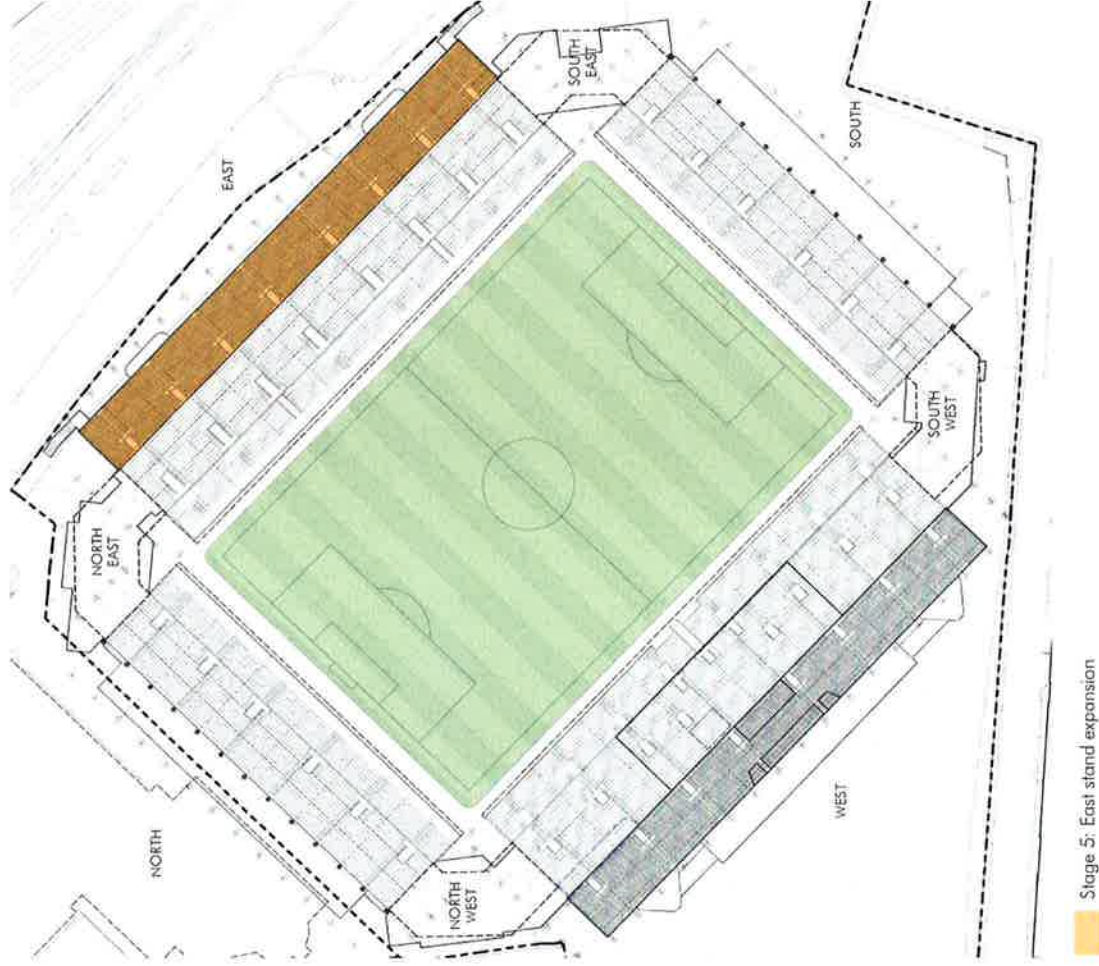
Access and egress would therefore be via external stairs in the southeast and possibly northeast corners to a raised lateral walkway sitting over the external concourse

and running the length of the stand. From there, two new scissor stair cores would provide access up to the new upper concourse level, each with 3 turnstiles and an access, evacuation and goods lift.

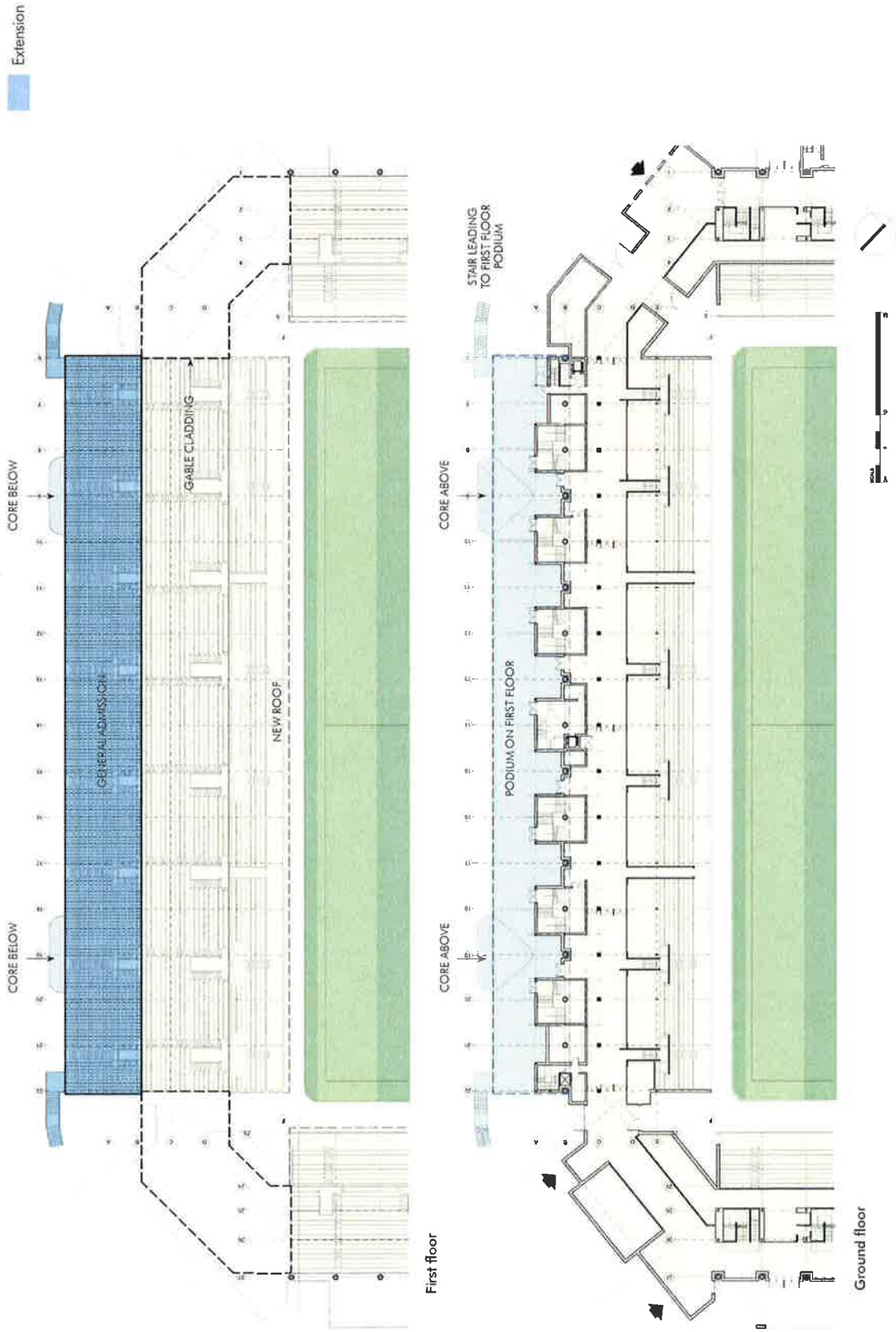
No wheelchair viewing positions would be provided to the new upper tier, but a further 9 additional wheelchair positions would need to be provided within the stadium to comply with FLA "Accessible Stadia" requirements for the 3,000 seat increased capacity.

External envelope and roof

The external envelope enclosing the new general spectator accommodation would be similar to the existing stadium. The new roof structure and cladding could be broadly designed to be similar to the existing stand to maintain design unity and adapted to suit the larger footprint.



Stage 5: East stand expansion



Entrance east stand

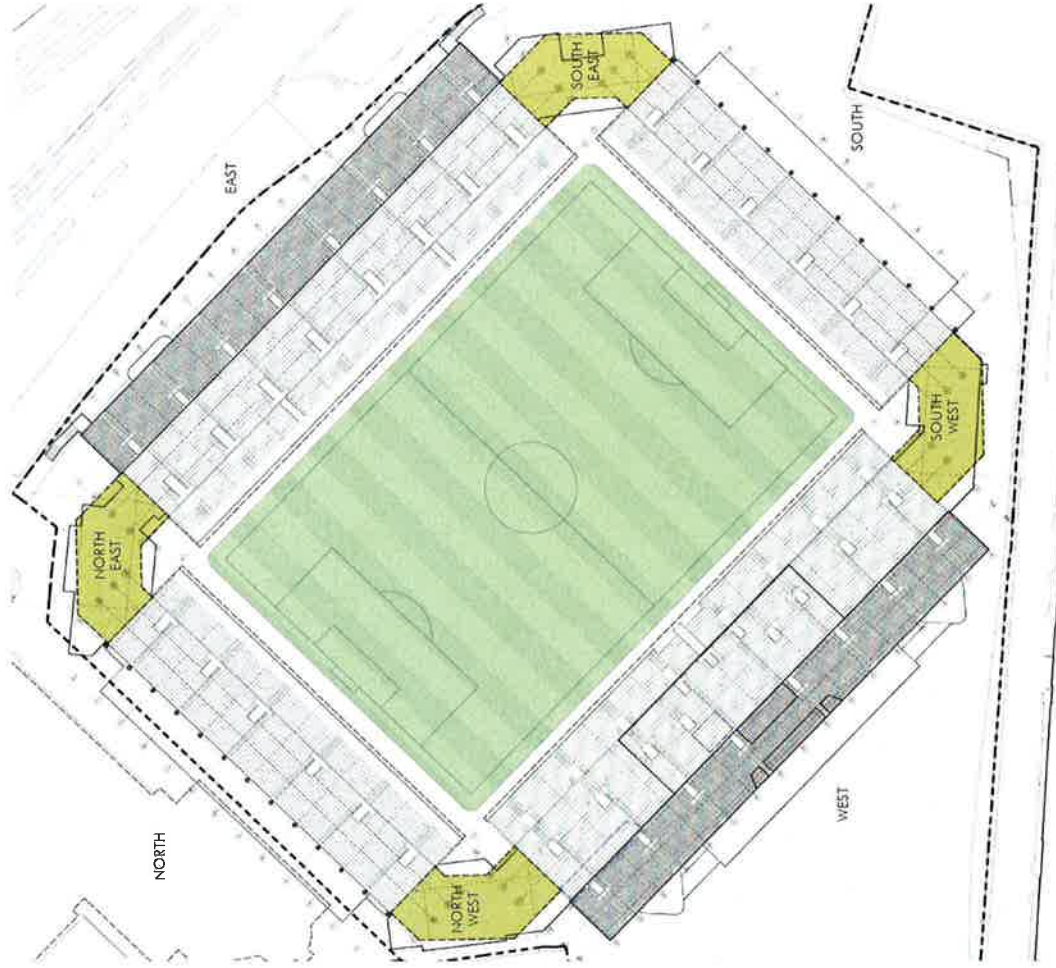
8.0 Corner expansion issues

Infilling all four of the corners would theoretically deliver a further 2,000 seats, though MFC would need to consider the complex implications of doing so.

In each corner, additional seating would be provided by either extending the end stand upper tier by one or two bays, or alternatively cranking the end stand upper tiers around the corners to join up with the long stands. In both cases, the existing corner accommodation including turnstile entrances and exits would need to be demolished and rebuilt to fit the new infill corner structure. The cranked roof structure would naturally be more complex and therefore expensive than the straight extension.

The southwest and southeast corners would suit infilling in as much as they would reinforce the notion of the South stand as the "home end". However, doing so would probably impact on the pitch condition by reducing natural ventilation through the open corners and reducing the natural daylight, particularly in the southwest corner.

The northwest corner would probably not suit infilling as it is already close to the junction between Zampa Road and the main entrance into the West stand forecourt, whilst infilling the northeast corner would place more general spectator seats immediately adjacent the away fans seating in the North stand, a solution the local Safety Advisory Group and Metropolitan Police are unlikely to agree to.



Stage 6: Possible corner expansion



Document verification

Revision number	Date	Description	Issued by	Approved by
1	13 October 2010	Final Draft	JF	GK



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