

The Planning Inspectorate Temple Quay House 2 The Square Bristol BS1 6PN 1 Ernshaw Place Putney London SW15 2BT

16 October 2022

Dear Sirs,

## Reference Ref: APP/H5960/C/22/3305470 Rosslyn Park Rugby Club SW15 5JH, 2021/0515/ENF - Appeal

The Putney Society as the amenity society for Putney and Roehampton wishes to raise objections to this appeal. Our objections are those raised in our objection to planning application 2021/5767 which sought retrospective approval for the retention of static shipping containers used for dark kitchens and other purposes, subsequently withdrawn. The planning statement with this related application noted on page 6 that this is Metropolitan Open Land yet claimed on page 7 that 'The application site is located within the existing built up area of Wandsworth'. This is quite simply not true. Other than the single storey rugby pavilion and modest open stands this land has never been developed.

The London Plan Policy G3 says the tests for what can be done in MOL are those for Green Belt. Paragraph 149 of the NPPF allows new facilities on Green Belt / MOL only in connection with existing sports use, and only 'as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it'. In the context of the original use for a number of the containers as commercial dark kitchens, there is no justification for being on MOL.

The same is true about the growing proliferation of other containers on the site. MOL is OPEN LAND and must be protected from development. No static container on this site has had planning approval which is why this appeal should be refused. For the purpose of this appeal it is irrelevant what the appellant claims is their current or proposed usage, they do not have any planning permission for these containers, these "developments".

It is interesting to note that the appellant now claims that the used/intended use of these containers is for gyms for the rugby club. It appears that those currently in use for the purposes of a gym are let out to commercial organisations who charge a membership fee rather than being part of the rugby club facilities. As with the dark kitchen, the club's evident intent with these containers continues to be revenue generating rather than providing extension of the club's core purpose. Sadly, as with previous planning applications, the club has a history of economy with the truth.

The Putney Society The amenity society for Putney and Roehampton. Registered Charity No. 263242 www.putneysociety.org.uk Yours faithfully

Mark Poulter, Deputy Buildings Panel Convenor For and on behalf of the Putney Society.