

Daniel Allen,
Planning Officer,
London Borough of Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham,
TW1 3BZ.

9 December 2016

Dear Mr Allen

PLANNING APPLICATION 16/2178/FUL
Installation of LED floodlighting system to replace current floodlights on
top of East and West stand, Twickenham Stoop Stadium, Langhorn Drive,
Twickenham TW2 7SX
Objection by FORCE

I write in relation to the above application, on behalf of Friends of the River Crane Environment ("FORCE"). FORCE is an environmental and educational charity comprising some 500 mostly local members, committed to the protection and improvement of the environment and ecology of the River Crane valley, including the Duke of Northumberland's River ("DNR") between Mereway and the Thames.

FORCE has a very direct interest in this application. Twickenham Stoop Stadium abuts directly onto the DNR with a frontage of some 300 metres in length on the west side of the stadium. On its east side, the stadium lands abut the public open spaces of Challenge Court and Craneford West Field, the latter of which is bounded on its south side by the River Crane.

Given our direct interest, FORCE is disappointed not to have been consulted directly about this application. FORCE is also disappointed that the DNR Steering Group, which is managing the investment of some £400 000 of partnership funding to enhance the environmental and ecological value of the DNR (see below) has not been directly consulted on this application either. We note that the public consultation period is already closed, but trust that in preparing its final report and recommendation, the Council will give due regard to this submission despite its lateness.

This submission describes the importance of the site, and comments on specific aspects of this application.

Importance of the Twickenham Stoop Stadium site

As noted above, the stadium abuts directly onto the DNR with a frontage of some 300 metres in length on the west side. Within the past year, the DNR and its adjacent footpath along this frontage have been significantly improved by the investment of some £400 000 of funding from several partners, including the Greater London Authority and the London Boroughs of Richmond upon Thames ("LBRuT") and Hounslow ("LBH"). Surveys indicate that this investment has been highly successful in increasing usage of the footpath, and the investment has significantly increased the amenity value of the corridor for local residents.

Moreover, the DNR is a key wildlife corridor in LBRuT and LBH. The stretch of the DNR adjacent to the Stoop, emerging from Kneller Gardens and the Council's own depot, is particularly important in ecological terms. A detailed survey of the local bat population was undertaken in 2015 for the DNR Steering Group. This identified that six, and possibly seven species of bat regularly use this corridor for foraging and access to other feeding grounds. On behalf of the DNR Steering Group, FORCE has enclosed a copy of this survey with this response to the Council. The corridor is also regularly used by kingfishers, water voles and other species.

At the east side of the stadium, its grounds link to the open space of Craneford West Field. This in turn links to the open spaces of Craneford East Field, Twickenham Rifle Club and Twickenham Junction Rough, through all of which the main channel of the River Crane flows. The River Crane is an important wildlife corridor, and the open spaces provide important nocturnal foraging for bats, owls and other species. Again, recent surveys of bat presence are available if required.

In conclusion, the Twickenham Stoop Stadium is situated in an area of great environmental and ecological significance. FORCE would hope that LBRuT will be mindful of this significance in its consideration of the present planning application.

Specific comments on this application

FORCE comments on:

- The failure of the application to recognise the environmental and ecological significance of this location
- Specific shortcomings in the proposed floodlighting technology and its use
- Adverse consequences to the ecology and to residents of approving this application.

1 The failure of the application to recognise the environmental and ecological significance of this location

The Site Location Plan submitted separately in June 2016 clearly marks the route of the DNR adjacent to the Twickenham Stoop Stadium. However, the "Lighting Impact Comparison" undertaken in August 2016 by Neil Johnson Sports Lighting

Consultants Ltd simply does not acknowledge that the site directly abuts the Duke of Northumberland's River. The description of the Site Location on page 1, merely notes that "The nearest residential properties are on Rosecroft Gardens, approximately 30m to the west of the stadium." The application appears to make no reference whatsoever to the DNR, let alone to the environmental and ecological implications of the proposals. Nor does the application acknowledge that on its east side, the stadium abuts the public open spaces of Challenge Court and Craneford West Field, the latter of which is bounded on its south side by the River Crane.

2 Specific shortcomings in the proposed floodlighting technology and its use
FORCE notes that the proposed replacement floodlights are fitted with external hoods to reduce upward spill light and shield residential properties. We expect these light hoods to be maintained in good order throughout their life and to be trimmed and improved as and when environmental impacts and/or technological advances require and allow. This aspect to be appropriately conditioned.

We note that the lights are dimmable. We expect the lights to be operated at a dimmed level at all times except during the hours of actual live TV coverage of a game at the stadium. This would include returning the lights to their dimmed setting as soon as possible after live TV coverage has ceased, and dimming them to the minimum required for play, in the event that the fixture is not being televised. We regard this as essential in order to minimise light intrusion into the DNR corridor and to the east of the stadium. This aspect to be appropriately conditioned.

We note that while the new lighting system offers improved control over its predecessor, it remains the case that "some light spill is emitted from the stadium in the locations of the open corners." It should be noted that two of these open corners abut directly onto the DNR, and the other two abut more indirectly the public open spaces of Challenge Court and Craneford West Field.

Given that "pitch illuminance levels will be increased by over 30%" with the new lights, the level of light spill that will occur at all of these open corners will clearly be significantly higher than current levels. We do not therefore understand how this can be consistent with the assertion that; "The improved light control will lead to significant reductions in obtrusive light towards residential properties." In any event, FORCE would like LBRuT to insist that further design work is undertaken to minimize the intrusion of this spill light at all four corners of the stadium. This aspect to be appropriately conditioned.

3 Adverse consequences to the ecology and to residents of approving this application.

Given that "pitch illuminance levels will be increased by over 30%" with the new lights, and given the proposed extended hours of operation of the new lights, FORCE believes that the lights could significantly increase light pollution of the

DNR corridor, and also of the Challenge Court and Craneford West Field open spaces, at the exposed corners of the stadium. They will also lead to an overall increase in light pollution levels on match days unless the dimming capability is operated rigorously during the hours when proceedings on the pitch are not being televised.

In this context, the increasing intensification of floodlighting of the stadium and the extension of the hours of intensive floodlighting, particularly across dusk, will directly disturb the residual local bat populations, and will directly and significantly contribute towards the “tipping point” whereby urban conditions become so intrusive for bats that the population is no longer sustainable. FORCE looks to LBRuT to protect this particular local environment from further degradation posed by intensified floodlighting.

Given the potential of this application to disturb the local bat populations, and given the status of bats as European Protected Species, FORCE is surprised that neither the applicant nor LBRuT appear to have commissioned an investigation into the impacts of these proposals on the local bat populations. Given this omission, and the lack of explicit consideration to the issue of bats, **FORCE Objects to this Application.**

Finally, FORCE notes that the intensification of the floodlighting pollution which will leak from the corners of the stadium onto the DNR footpath will change the character of this riverside environment for local residents and for all evening users of this sensitive ecological corridor, which has itself just been improved by the investment of significant funding, including from the Greater London Authority.

FORCE would be pleased to discuss any of the above comments in more detail, and to provide surveys of residents’ usage of the DNR footpath and surveys of bat activity in the DNR corridor, if this will be helpful to LBRuT in reaching its decision concerning this application.

Yours sincerely,

Gary Backler,
Planning Trustee,
on behalf of Friends of the River Crane Environment