



Planning, Design & Access Statement

Installation of Security Upgrades including Peripheral and Inner Ticketing Fencing, 3 no. Turnstiles and CCTV at RFU Ground, Twickenham

Application for Full Planning Permission

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TurnberryPlanning

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1.0 Introduction

1.1 This Planning, Design and Access Statement has been prepared on behalf of Rugby Football Union (RFU) in support of a Full Planning Application seeking permission for various security upgrades to the stadium. Specifically, permission is being sought for the following:

- Erection of 3m high fence adjacent to the west of the Energy Centre and compound areas (inside the outer perimeter fence line);
- Erection of 2m high fencing adjacent to Whitton Road;
- New inner ticketing perimeter fence at 3m high and new turnstiles to three locations around this inner ticketing fence; and
- Installation of new CCTV along western boundary and key locations within and around the RFU Ground.

2.0 Site Context

2.1 Twickenham Rugby Stadium is the home of England rugby. With a spectator capacity of 82,000 it is the largest dedicated rugby stadium in the world. Rugby has been played at Twickenham for over 100 years, and the stadium is now also host to non-sporting events including conferences and concerts.

2.2 A typical match day can see up to 82,000 spectators plus staff arrive at the stadium, many turning up long before the match begins to enjoy hospitality from one of the many hospitality areas within the stadium. The West Stand houses the players changing rooms, Members' Lounge and President's Suite and is the most exclusive section of the ground. Elsewhere around the stadium are restaurants, hospitality boxes, staff offices, a shop, museum and ticket offices. The stadium has undergone a series of upgrade works in the last couple of years and security improvements are vital in complimenting this, improving the stadiums overall appearance and experience to ensure the stadium remains a first class venue.

2.3 The site is located in Twickenham, West London. It is situated a block north of the South Circular A316, Chertsey Road and a short walk from Twickenham Rail Station to the South East. Private residences lie to the south, sewage works to the north, an industrial estate to the east and Chase Bridge Primary School to the West. The site is largely level in its topography.

2.4 The site comprises of the stadium with associated outbuildings, concourses and car parking areas. The outbuildings include turnstiles, workshop and external storage and the Energy Centre. The stadium has four named stands that form the one bowl, these are North, South, East and West stands.

3.0 Justification of Development

3.1 Security measures are an important and essential element to the safe and efficient operation of major Stadia. In support of events at Twickenham, a security review has been undertaken to assess where opportunities lie to improve and strengthen security measures. Expert police advice has aided this review and will be submitted separately to the council in support of this application given its confidential nature.

3.2 Generally speaking, the security review highlighted weaknesses in fencing where unauthorised access could be gained and or dangerous/prohibited items could be passed through from the external side. In response, and taking on board expert advice, RFU is proposing a number of simple security improvements which will enhance the existing security provisions, providing a safer environment for all who frequent the stadium. The areas affected by the proposals consist of outer perimeter fencing, stadium ticketing perimeter fencing, installation of CCTV and turnstile access points.

1) Perimeter Fencing

The outer perimeter fence serves as a deterrent to people seeking to gain unauthorised access to the hospitality areas on match days, mainly along the path of the Duke of Northumberland River, whilst also acting as a barrier to operational areas. At present the western boundary consists of a 2m high chain link fence and an inner fence line. In certain areas the outer chain link has been removed leaving this important boundary fragmented and vulnerable.

In recognition of the importance of operational areas to the running of the Stadium, namely the Energy Centre and compound areas, an additional 3m high mesh fence line is proposed adjacent to these areas. This fencing will lie inside the outer perimeter fence and will return and connect to the existing inner fenceline.

In addition to the above, it is also proposed to remove the existing chain link fence along the western boundary and replace/reinstate it with a 2m high mesh fence. This particular work does not form part of this planning application as it constitutes permitted development under Part 2, Class A of The Town and Country Planning (General Permitted Development) (England) Order 2015.

It should be noted that both fence elements referenced above follow expert security advice and will provide a consistent and secure boundary along the DNR. This security advice will be issued separately to the council as detailed in paragraph 3.1.

2) Inner Ticketing Perimeter

The inner ticketing perimeter is the main security boundary to the stadium where spectator access is controlled by means of turnstiles and manned points of access and egress for

maintenance vehicles and emergency vehicles. Staff currently have to enter via the south stand entrance which means a major detour is necessary if they park in the north car park. New inner ticketing perimeter fencing at 3m high and new turnstiles to three locations around this inner ticketing boundary to improve access are proposed. The inner perimeter fence will retain its existing path and all of the existing points of access in the proposed fence layout.

3) Installation of CCTV

The installation of new CCTV will also improve security within the Ground. CCTV equipment is proposed along the western perimeter fencing at three locations plus multiple points within the ground supported by the inner ticketing fencing. On the western boundary cameras will be able to scan around RFU land but not out to the public domain.

Precise CCTV specifications are in the process of being procured and the RFU is content to take a planning condition requiring these details to be submitted for approval by the council prior to installation.

4.0 Design & Appearance

4.1 The materials have been chosen for security reasons and to reduce the overall impact of the requirement for a physical barrier as follows:

- Fencing – black secure mesh (Betafence type 358) anti climb fencing to vary in height between 2m high and 3m high depending on location as outlined in the application documentation. All existing access/egress points will remain unchanged. Please refer to fencing specification submitted in support of the application.



Figure 4: secure mesh fencing

- Turnstiles – three new turnstiles located (as per the proposed drawing) to the north, south-east and south-west of the inner perimeter ticketing boundary are proposed to assist in the day to day access for staff, including match days. The turnstiles will be full height, swipe activated metal construction gates to be on the line of the secure mesh fence line. The Turnstiles are specification KABA Kentaur FTS E02, specification documents have been submitted in support of the application.

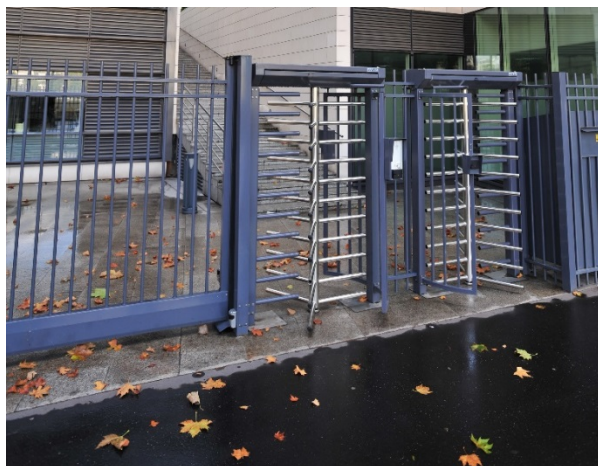


Figure 5: proposed turnstile

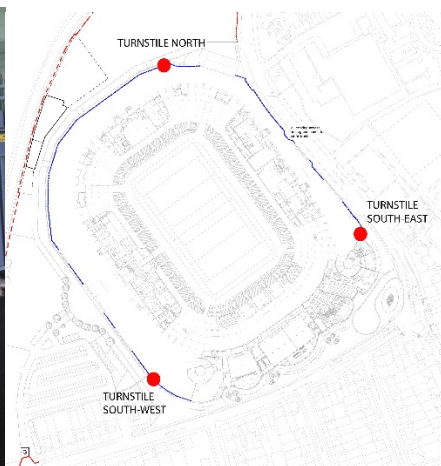


Figure 6: proposed turnstile locations

- New CCTV cameras to be strategically placed (as per the submitted proposed stadium plan drawing 11858-A04.1-003) along the perimeter fencing and inner ticketing fence line. Further details and specifications will be submitted in due course.

5.0 Access

Vehicular

- 5.1 Twickenham Stadium is on the northern side of the A316 into London. From the M25 motorway, exit at Junction 12 on to the M3. As Twickenham stadium lies in a residential area the surrounding roads are resident permit holders only and the RFU discourage parking outside of their designated areas. Demand for match day parking is high and must be booked in advance. Blue badge holders receive a 50% discount on parking prices. The RFU issue up to 336 free parking spaces for all international matches through priority wheelchair access.
- 5.2 Car parks are located to the North and West of the stadium. There are a number of designated car parks. These are the Rosebine Avenue car park located next to Harlequins RFC, Tesco car park off Mogden Lane, Cardinal Vaughan car park, the North car park and the West car park.
- 5.3 Shuttle buses from nearby train stations stop adjacent to the stadium on Rugby Road. Buses 281, 267 and H22 all run regular services which pass close to the stadium. Alternatively, take

a 33, R68, R70, 290 or 490 bus to Twickenham town centre (King Street) – the stadium is a 10 to 15 minutes walk away.

- 5.4 Free parking facilities are available in the Stadium's North and West car parks. Pre-booking may be required for some events for motorcycles.

Site Access

- 5.5 The stadium sits on a predominantly flat site with access gained by general spectators from 6 designated entrances located on the West, North and East sides of the ground. An external perimeter fence acts as the first point of entry before the stadium is entered. Access via the South Stand is controlled and restricted.

- 5.6 The stadium has a set of ground rules that need to be adhered to on access to the site past any of the controlled ticket points.

Stadium Access

- 5.7 Access for general spectators to the upper levels is via 22 open staircases arranged around the ground within the perimeter fence. 5 public access lift cores, each with 2 lifts, bring spectators up to upper concourses and hospitality areas around the ground.

- 5.8 Twickenham Stadium provides 336 wheelchair bays of which 64 are located in 3 covered wheelchair terraces and all are managed by match day stewards. 272 bays can also be used for those who require non-wheelchair disabled access and in total, 7000 stadium seats are suitable for non-wheelchair easy access, in the lower tiers of the stadium. Lift access is provided to all three covered terraces and low counter bars are available at the North-East and North-West corners of the stadium, at ground level. Disabled toilets are located at all four corners of the Stadium and within easy access of the 3 wheelchair terraces. The stadium utilises the Universal RADAR key system to ensure the facilities are available exclusively to only those who require them.

- 5.9 This planning application relates specifically to the perimeter fencing adjacent to the Energy Centre and Whitton Road, the 3m inner perimeter fence, new turnstiles and CCTV camera provision.

6.0 Planning Context

Planning Policy

- 6.1 The planning policy context within which the proposals should be determined comprises guidance at the National, Regional and Local levels as follows:

- The National Planning Policy Framework
- The London Plan
- LB Richmond Development Plan Documents, primarily the Core Strategy 2009 and Development Management DPD 2011
- Supplementary Guidance

- 6.2 In the context of the identified planning policy guidance, a review of the development proposals reveals the following key considerations.
- 6.3 At the strategic level, Policies 4.5 and 4.6 of the London Plan support the growth of the Capital's visitor economy, supporting:
- "the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors."*
- 6.4 This is mirrored at the Local Level, whereby Policy CP20 of the Core Strategy, relating to "Visitors and Tourism" identifies that the Council will support the:
- "sustainable growth of the tourist industry, for the benefit of the local area by encouraging the enhancement of existing tourist attractions, such as Kew Gardens, Hampton Court Palace, Ham House and the River, including sport stadia particularly those of RFU and Harlequins".*
- 6.5 As such, the continued success of Twickenham Stadium as a world class sports venue is supported by strategic policies at both the Regional and Local levels of Planning Policy.
- 6.6 The National Planning Policy Framework (NPPF) also stresses the need to establish safe and sustainable places, stating that local authorities should:
- "create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion".*
- 6.7 This is reiterated in the London Plan Policy 7.3 *Designing Out Crime* which requires development decisions to reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular, *"places, buildings and structures should incorporate appropriately designed security features"* with routes and spaces that should be legible and well maintained, providing for convenient movement without compromising security.
- 6.8 Paragraph 7.10 of the London Plan makes reference to the importance of the Police publication *"Secured by Design"*, which requires development to reduce opportunities for anti-social and criminal behaviour by maximising the security of people and property without compromising the quality of the local environment.
- 6.9 The adopted local plan proposals map designates a portion of the application site as Metropolitan Open Land (MOL) and therefore local planning policy DM OS 2 applies to a section of the application site. The designation relates to a strip of land which runs along the western boundary of the stadium's operational site and originates from the historic use of the land as allotments. The policy objective is to retain the borough's MOL designation as

predominantly open space. The designation extends west to include the adjacent Duke of Northumberland River and Chase Bridge Primary School grounds.

6.10 Planning Policy DM OS 2 states that:

“It will be recognised that there may be exceptional cases where appropriate development such as small scale structures is acceptable, but only if it:

- 1. Does not harm the character and openness of the metropolitan open land; and*
- 2. Is linked to the functional use of the Metropolitan Open Land or supports outdoor open space uses; or*
- 3. Is for essential utility infrastructure and facilities, for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the metropolitan open land.”*

6.11 It is important to recognise that the proposed scale of external upgrades are intended to enhance the visitor experience, whilst simultaneously improving the consistent visual appearance and security of the stadium. It is considered that the proposed development meets the exception to development in MOL under parts 1 and 2 of the above policy, this conclusion is explained in the following analysis.

7.0 Planning Analysis

7.1 As noted in the introductory section to this Statement, the proposal can be split into various simple security upgrades within the wider Ground.

7.2 The strategic planning policy context supports development proposals that contribute to the success and sustainable growth of cultural tourist facilities, of which Twickenham Stadium is one. Appropriate security provision and delivering safe and accessible places are also highly promoted within NPPF and local policy which both are considered to positively support the security enhancements proposed.

7.2 However, it is acknowledged that part of the development site is designated as MOL and therefore the proposals must also be interrogated against policy DM OS 2.

7.3 This policy only relates to part of the application site, specifically the area adjacent to the Energy Centre and compound areas where a 3m high fence is proposed and where CCTV equipment will be installed in peripheral western locations. All other development will take place outwith MOL.

7.2 Thought and consideration have been given to the principle and requirements of Policy DM OS 2 when shaping the extent and location of development. Where development is necessitated within MOL this has been kept to peripheral locations, following existing fence lines where possible. The exception to this is the proposed 3m high fence adjacent to the

Energy Centre and compound areas. This is a new short fence line proposed in the context of an existing operational area with a built mass and footprint. Openness and visibility is already limited in this location.

- 7.5 Colours and materials have been selected to be sympathetic to the surrounding environment and to correspond with existing features. It is therefore considered that the proposal will not impact upon the openness or character of MOL having a neutral impact thus complying with part 1 of Policy DM OS 2.
- 7.6 Furthermore, the proposal supports the principle use of the wider RFU Ground as a sporting and event venue and we would suggest the proposal also very much complies with part 2 of Policy DM OS 2 by supporting an outdoor open space use.
- 7.7 In summary, the proposed development will ensure Twickenham Stadium can continue to compete on a national and international sporting and event platform benefitting not only the local but national economy whilst having a neutral impact upon MOL.

8.0 Environmental Considerations

Ecology and Trees

- 8.1 It is anticipated that no trees will be lost as a result of development. There will be no encroachment outwith the RFU site so there will be no impact on the river corridor and associated biodiversity interest.

Flood Risk Assessment

- 8.2 The proposed site is situated within Flood Zone 2 and a Flood Risk Statement accompanies the planning application documentation. This Statement confirms the proposals will have no adverse impact in terms of flood risk given no additional floor space is proposed and there will be no overall impact on the permeability of the surface.

9.0 Summary & Conclusion

- 9.1 Twickenham Rugby Stadium is the home of England rugby. With a spectator capacity of 82,000 it is the largest dedicated rugby stadium in the world and is one of the premier stadia in London.
- 9.2 Consultation with the Metropolitan Police has established that there is a fundamental requirement to increase the physical security of the stadium. The proposed works to the perimeter fencing will improve the overall security of the stadium all year round, minimising opportunities for anti-social behaviour both in the stadium and in the surrounding area.
- 9.3 The proposals will allow the RFU to implement security measures which are imperative to its long term sustainability, bolstering the stadiums reputation for excellence and contributing towards hosting future major events.