



**Sustainability Statement**

**Proposed Monster Jam event at Twickenham Stadium**

**On behalf of the RFU**

**Application Ref: 15/02734/FUL**

December 2015

**Turnberry**Planning

## **Introduction**

This Sustainability Statement has been prepared following the deferral of the planning application for the proposed Monster Jam event by planning committee on 25<sup>th</sup> November. At this meeting, the committee stated that further information was required regarding environmental and sustainability matters associated with the Monster Jam event ahead of presenting the application to a subsequent planning committee.

Excepting travel planning, the carbon footprint of operational development is not a requirement of planning policy for operations such as this. Notwithstanding that this issues falls outside the remit of planning, the RFU and their partners take reductions in Carbon Emissions and wider sustainability objectives seriously.

This statement is therefore not a requirement for validation for this proposal but it sets out a response to the various matters identified by the Council in their deliberations over this application. The RFU take the concerns of the Council seriously and we trust that this statement is of assistance.

## **Planning Policy Background**

The following policies and guidance were identified at planning committee as being of relevance to this application and a basis for the preparation of the further information:

- Policy CP1 (with emphasis on Air Quality)
- Policy CP2 – Reducing carbon emissions
- Policy CP4 – Protection of Biodiversity (raised in connection with impact on Duke of Northumberland River Corridor)
- Sustainable Construction Checklist

It should be noted that Policy CP2 is considered to be irrelevant to determination of this specific application as this relates to development of buildings and renewable energy provision. The other policies generally tend to be aimed at new construction rather than operations, with policy CP4 directed towards biodiversity around the Duke of Northumberland River that will not be impacted by this proposal.

The Sustainable Construction Checklist is clear in identifying that is only mandatory for the following types of development:

- New residential development providing 1 or more new dwellings, or
- New non-residential development providing 100m<sup>2</sup> or more floor area

Given that the Monster Jam proposal would not result in the creation of any additional floorspace or residential dwellings, this document is also not considered to be relevant to this application.

Whilst the stadium is primarily used for the hosting of sporting events, it also benefits from planning permission to host up to 3 music concerts per calendar year. It should be noted that no such concert has been held at the stadium since Lady GaGa performed in 2012. The stadium is therefore not in constant use for other activities outside its primary use for sporting events.

### **Twickenham Stadium Approach to Sustainability**

The following section identifies the topic areas that were highlighted by the planning committee and provides further assessment of these matters:

The RFU would like to reassure Richmond Council that it takes matters relating to sustainability seriously and has its own operational procedures, policies and management systems in place to respond to this very subject.

The most relevant of these procedures is represented by Twickenham Stadium's ISO 20121 certification, a copy of which can be found in Appendix 1.

ISO 20121 is the international standard for Sustainable Event Management and requires that a compliant organisation develop policies and procedures to identify sustainability issues related to an event, assess the risk associated with them and where appropriate arrange monitoring or mitigation to manage each event's impact.

This management system is externally audited by the BSI on a 6 monthly basis. Under this management system the stadium has identified the following issues related to Monster Jam

### FELD Motorsport Approach to Sustainability

The Monster Jam event is organized by FELD Motorsport who are committed to the safe and sustainable running of all motor sport events that they host. The focus for FELD in running Monster Jam is to make these fun and attractive to a family audience and bring people close to the action so that they can enjoy the thrill of watching the trucks in action.

FELD have a substantial track record in the successful preparation of such events and they have provided further information about their approach in correspondence that can be found within Appendix 2.

### Carbon Emissions

In relation to carbon emissions arising from the hosting of the event, the RFU have identified the following key principles:

- Overall emissions from Scope 1 and 2 sources are considered to be comparable to the hosting of concerts or rugby matches at the stadium, although peak consumption levels are likely to be lower than that of a large rugby match due to the timescale of the event;
- The Stadium Building Management system will be optimised for the event to ensure energy is used efficiently throughout the event lifecycle;
- The Stadium has been awarded ISO20121:2012 in recognition for its Sustainable Management System for Events;
- Emissions from the event showpiece are unlikely to represent more than 1-2% of the overall event footprint and therefore should not be a significant added impact although we will also set out the sustainability policies operated by FELD.

### Spectator Travel

Public transport and more sustainable transport modes to and from the event will be supported in line with traffic management measures that will be agreed with the Council prior to the event. The modal split of trips to and from the stadium on event day are considered to be in line with those associated with concert events held at the stadium. The RFU have also committed to the following:

- Undertake a sample travel survey on the day of the Monster Jam event to identify travel patterns for those attending. Survey area and methodology to be agreed in writing prior to the event (intended sample size of 500 people);
- Preparation of an event specific Travel Management Scheme prior to hosting the event to include shuttle bus services;
- Monitoring and enforcing the Event Day CPZ on the day of the event.

### Waste Management

The RFU operate a zero to landfill policy Recycling 60% of all waste generated at events; The RFU engage with all event suppliers to try to eliminate waste from the event lifecycle wherever possible.

### Ecology and Biodiversity

The planning committee expressed some concerns relating to the Duke of Northumberland River that is adjacent to the stadium and the wildlife that this supports. The specialist ecological consultants, Applied Ecology, have now reviewed the issues raised and have provided a brief commentary on potential impacts arising from the hosting of the Monster Jam event.

The potential sources of pollution to the river habitat that have been reviewed are:

### **1 Noise pollution**

The noise management report modelled the event to derive a noise profile for the surrounding area. The resulting noise contour plan (attached at appendix 3) illustrates that only a small part of the river corridor would be subject to a slightly elevated noise profile during the event which would be in the order of 62 dB (A) Leq. This was not considered to be at a level that would be detrimental to the amenity of residents within the nearby properties and is not considered to have an adverse impact upon wildlife.

### **2 Light Pollution**

FELD Motor Sport have confirmed that any lighting proposed around the exterior of the stadium for example to illuminate compound/storage areas, will be directed away from the tree line of the River Corridor to avoid any impact upon the local bat population.

### **3 Pollution of the water environment**

A temporary bund will be created around any areas where fuel or oil will be stored to prevent any leakage into the river.

From their experience and knowledge of the Duke of Northumberland River and the RFU stadium, with the inclusion of the above measures it is not considered that the wildlife within this habitat will suffer any adverse impacts.

### Noise

The Noise report that supported the application was undertaken following a visit to a Monster Jam event in Spain earlier in 2015. Readings of the noise value from the monster Trucks when running were taken at this event to establish their noise profile and relate this to the acoustic model for Twickenham Stadium that has already been defined and agreed with the Council.

This presents a robust analysis of sound dispersal that is forecast to result from the hosting of the Monster Jam event. In layman's terms, the Monster Trucks will reach a volume of 62 Db (A) as heard outside of the Stadium, which is equivalent to conversational speech.

The technical analysis within this report establishes that the noise profile for the Monster Jam event will be below the maximum noise level that has already been permitted for concerts that allows for a standard noise limit of up to 87dba with peak noise limits set at, far in excess of that forecast for the Monster Jam event.

Vanguardia, the authors of the noise assessment report, have undertaken a review of the issues raised at planning committee and this notes the following:

- The noise management report submitted with the application was prepared

following a visit to a Monster Jam event that was hosted at a stadium with no roof. Observations and measurements were made at this event and whilst the trucks were audible outside of the stadium, the noise was not dominant in the area immediately surrounding the venue.

- Hearing protection will be required for staff at the event as they would have a greater exposure to the sources of noise and this is an employer requirement under the Control of Noise at Work Regulations. Spectators are attending to experience the thrill of the Monster Truck racing and freestyle show, part of which is the auditory sensation. They will not have the same extended exposure to noise as employees, but should it be wanted, noise protection is available to spectators at all Monster Jam events and will be available at Twickenham.
- A large music event generally starts in the afternoon and can continue past 2230 hrs. The music noise from a concert is likely to be higher in level over a more sustained period with a few short intervals of around 20 minutes. Monster Jam will have shorter period of elevated noise levels.
- When compared with the hosting of a music concert, the overall noise impact on nearby residential properties will be less than for a major music event. The noise levels will generally be lower, the event is much shorter and the finish time is much earlier.

Notwithstanding the above, the RFU have committed to monitor the acoustic conditions on the day of the event at their own cost with the results to be shared with the Council. Furthermore, the RFU will provide a complaints hotline and neighbour newsletter to ensure that residents have a clear line of communication to the RFU during the hosting of this event.

#### Air Quality

The activities associated with the proposed Monster Jam event have been reviewed by Gair Consulting, a specialist in providing advice in relation on air quality matters. Their review of air quality issues outlines that air quality impacts are only likely to arise from the following:

1. Traffic related impacts from the import and export of soil to create the track
2. Generation of fugitive dust during the creation and removal of the track
3. Emissions from the trucks within the arena during the performance

Emissions from the trucks during their movement around the site and into and out of the stadium were not considered any further by Gair consulting as these would be transient and it was concluded that emissions affecting air quality from this would be minimal.

In addition, the hosting of the Monster Jam event is not considered to dramatically differ from any other event held at the Stadium in relation to potential air quality impacts and impacts arising from the transport of attendees to and from the stadium would be less than would be associated with the permitted use of the stadium for sporting events as this would have fewer spectators.

Furthermore, public transport and more sustainable transport modes to and from the event will be supported in line with traffic management measures agreed with the Council prior to the event. The modal split of trips to and from the stadium on event day are considered to be in line with those associated with concert events held at the stadium.

The RFU stadium is within the GLA Low Emission Zone and the delivery vehicles that will serve the stadium will be compliant with these regulations to ensure that emissions from the delivery vehicles meet the required standards. These deliveries will be made outside of peak network hours, thereby avoiding congestion during the morning and evening peak, again ensuring that vehicles do not stand in traffic to minimise emissions.

Dust suppression measures will also be implemented during the site set up and take down for the event in the construction of the track. FELD Motorsport utilise such measures at their events using fresh water to control dust as is common practice on earth moving sites but they are generally far more sensitive to this than average construction sites because of the location of the venues and their proximity to populated areas. The delivery vehicles transporting the soil will be sheeted so that the dispersal of loose soil does into the atmosphere is minimized during transportation.

FELD also make provisions to process moisture into the track material at the source to reduce dust while transporting, and to make the material more suitable for use in track construction. In addition, the event is a spectator event, and their goal is ultimately to have no dust for the event as it would impact the spectator experience. A high volume water truck is typically used solely for this purpose and a dedicated track construction operator is designated to control dust as required.

Traffic related impacts from the import and export of soil to create the track will not be substantial as a result of the following:

- Traffic is most likely to be routed via the A316. Traffic flow data from the Department for Transport gives annual daily flows of circa 50,000. The addition of up to 200 HGV's to deliver the soil would therefore make up a small proportion of these trips of only 0.4% of this total flow.
- The stadium is within the Low Emission Zone and it is intended that trucks will comply with these standards.
- Movements will not take place within peak hours, thereby avoiding congestion.

- Trucks making deliveries to the stadium will not be allowed to idle when stationary within the stadium area

Generation of fugitive dust during the creation and removal of the track is also not considered to be a substantial issue as a result of the following:

- Only clean inert material will be used to create the track
- This material will be moistened at source
- The HGV's will be sheeted to prevent the material drying out and dispersing during transportation
- Water will be available throughout the construction period

Emissions from the trucks within the arena during the performance are not considered to be substantial as a result of the following:

- The monster trucks run on ethanol which is a relatively clean fuel when compared to other fuels such as diesel
- The products of combustion will principally be Water and Carbon Dioxide
- The nature of the event means that engines will not be revving fully for sustained periods so the engines will not be burning much of this fuel for very long.
- The stadium has an open roof and this should allow for the dispersal of any emissions.

On the basis of this review of likely air quality impacts, it is not considered necessary to undertake air quality monitoring of this event. Notwithstanding this, the RFU are willing to accept a planning condition that will require them to undertake air quality monitoring during the hosting of this event on the basis that a relevant and appropriate scope can be developed between the RFU's technical advisors and those acting for the Council.



## APPENDIX 1

# Certificate of Registration

EVENT SUSTAINABILITY MANAGEMENT SYSTEMS - ISO 20121:2012

This is to certify that:

Rugby Football Union  
200 Whitton Road  
Twickenham  
TW2 7BA  
United Kingdom


Holds Certificate Number:

SEMS 591636

and operates a Sustainability Management System for Events which complies with the requirements of ISO 20121:2012 for the following scope:

**The management of events organised with the Rugby Football Union conducted at Twickenham Stadium including sporting events and customer defined events utilising in house and 3rd party staff.**

For and on behalf of BSI:



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Gary Fenton, Chair, Certification Body Management Committee

Originally registered: 06/02/2014

Latest Issue: 22/08/2014

Expiry Date: 06/02/2017



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## APPENDIX 2



A DIVISION OF

FELD ENTERTAINMENT, INC

December 2, 2015

Dear Sir/Madam:

I am writing to you regarding Feld Motor Sports, Inc. ("FMS")'s proposed *Monster Jam* event at Twickenham Stadium, tentatively scheduled for June of 2016. We understand that this proposed engagement is coming up for review by local authorities and that some members of the community have raised questions about this matter.

FMS, a subsidiary of Feld Entertainment, Inc. ("FEI"), is a global leader in family entertainment and presents spectacles such as *Monster Jam*<sup>®</sup>, *Monster Energy Supercross*, and *AMSOIL Arenacross*. FMS's *Monster Jam* is the largest touring monster truck property in the world with over 350 events that span the globe and include both stadium events and indoor arena events throughout North and South America, Europe, Asia and the Middle East. *Monster Jam* offers wholesome entertainment appropriate for the whole family, appealing to fans of all ages.

As family entertainment companies, FMS and FEI are committed to offering safe, family-friendly entertainment and to conducting our show operations in a manner that respects and benefits our host communities. This means not only contributing to the local economy by employing local labor, generating revenue for local businesses, and paying local taxes, but also to making the comfort and safety of our patrons our paramount concern.

Toward that end, FMS has developed a show operations and safety program that is the industry leader in live motorsports events and is staffed with well-trained and experienced operations and safety personnel at each event. FMS develops a show operations format taking into account all aspects of a specific engagement whether the venue is in an open-air stadium or an enclosed venue. This includes track construction, designated restricted areas, air quality management, and noise management, among other considerations.

FMS trucks are kept in prime condition and are state-of-the-art, running on methanol, a highly-efficient wood-based alcohol which creates low-emissions and is a sustainable and renewable fuel source. As such, any potential impact on the environment is minimal, particularly considering that the average FMS show runs about two hours and includes numerous breaks and interludes in which engines are not

running. For this reason, we do not believe that FMS shows pose a potential environmental or biodiversity concern.

While FMS is confident that we have developed a highly-entertaining show that will appeal to the whole family, and that we will present it in a manner that ensures the comfort and safety of our patrons and the surrounding community, we would be happy to address any specific concerns or questions you might have about our operations and our proposed show. Please do not hesitate to contact me directly for further information. I can be reached at +1 630 566 6423.

Sincerely,

Paul Thompson

Senior Director of International Operations

Feld Motor Sports

## APPENDIX 3

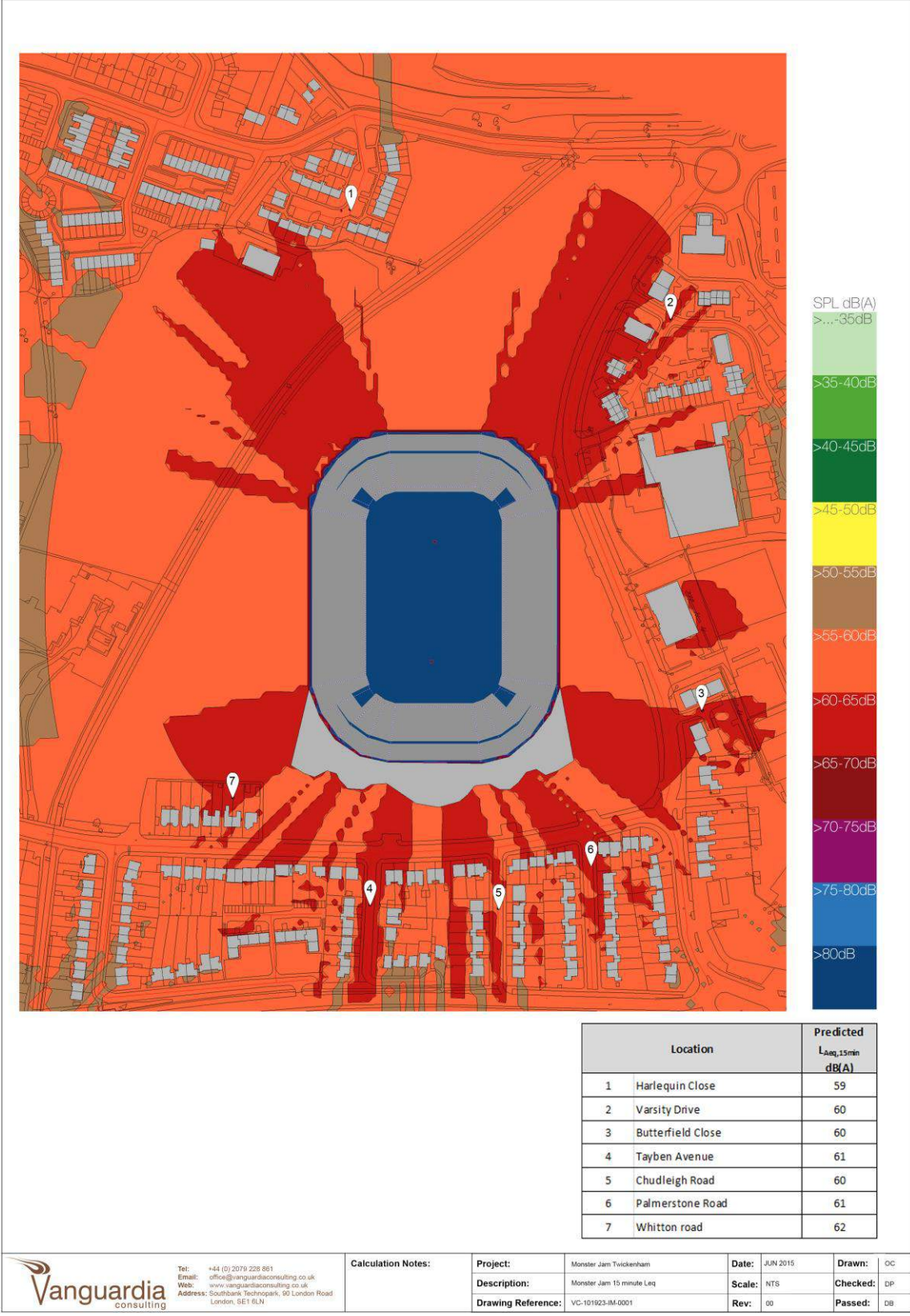


Figure 1 – IMMI contour plot showing noise breakout from Stadium during a Monster Jam event