

## **Policy CP1 (Sustainable Development) of LBRUT's adopted Core Strategy (2009)**

**“1.A The policy seeks to maximise the effective use of resources including land, water and energy, and assist in reducing any long term adverse environmental impacts of development. Development will be required to conform to the Sustainable Construction checklist, including the requirement to meet the Code for Sustainable Homes level 3 (for new homes), Ecohomes "excellent" (for conversions) or BREEAM "excellent" (for other types of development). This requirement will be adjusted in future years through subsequent DPDs, to take into account the then prevailing standards in the Code for Sustainable Homes and any other National Guidance, and ensure that these standards are met or exceeded”.**

Our response: the 'Sustainable Construction Checklist' is only relevant to the following types of development:

- New residential development providing 1 or more new dwellings
- New non-residential development providing 100sqm or more floor area

Given that the proposed Monster Jam event would not result in the creation of any new and permanent commercial floorspace nor involve the erection of residential development, it is considered that this part of Policy CP1 is not relevant.

**“The following principles will be promoted:-**

### **1.B Appropriate location of land uses**

**Facilities and services should be provided at the appropriate level locally, taking account of the network of town centres identified in policy CP8.**

**Higher density residential and mixed-use developments to be in town centres, near to public transport to reduce the need to travel by car”.**

As recognised in the previous Planning Committee Report (November 2015), the site is a permanent sports stadium and has planning permission to hold rugby matches of up to 82,000 people. The stadium also has planning permission (LPA Ref. 06/0154/FUL) to hold three concerts within any calendar year (between June and October) for up to 55,000 people.

Given that the proposed Monster Jam event will be held on a Saturday (from 3pm to 7pm) for up to 70,000 people (this is clearly less than the maximum permitted capacity of 82,000 people), it is considered that the principle of such an entertainment use on the site is acceptable.

### **“1.C Making best use of land**

**The use of existing and proposed new facilities should be maximised through management initiatives, such as co-location or dual use.**

**Redevelopment of sites should normally only take place where there can be an increase in the number of housing units and/or quantity of commercial floorspace”.**

As already noted above, the proposed Monster Jam event is considered to be consistent with how the stadium has been used for major sporting and entertainment uses.

#### **“1.D Reducing environmental impact**

**The environmental benefits of retaining and, where appropriate, refurbishing existing buildings, should be compared against redevelopment.**

**Development should seek to minimise the use of open land for development and seek to maintain the natural vegetation, especially trees, where possible.**

**Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised”.**

#### Noise

It is noted that LBRUT (Environmental Health) had no objections to the planning application as set out in the previous Planning Committee Report:

**“17. No objection subject to strict accordance with the details provided in section 3 and 4 of the Noise Assessment and Noise Management Scheme submitted by Vanguardia Consulting reference VC-101923SCS-DB dated June 2015. The noise management scheme shall thereafter be retained as approved”**

The submitted 'Noise Assessment and Noise Management Scheme – Working Document' (prepared by Vanguardia Consulting dated June 2015) modelled the event to derive a noise profile for the surrounding area that was based on a Monster Jam event in Spain and the acoustic model for Twickenham. The assessment presented a robust analysis of sound dispersal forecast resulting from the event. The Monster Trucks will reach a volume of 62 dB (A) Leq as heard outside of the Stadium, which is equivalent to the noise level generated by a typical conversational speech.

The technical analysis established that the noise profile for the event would be below the maximum noise level that has already been permitted for concerts (87 dBA).

Furthermore, the Monster Jam event will have shortened periods of elevated noise levels and would end earlier than permitted music concerts.

It is noted that the RFU have committed to monitoring the acoustic conditions on the day of the event and also have a complaints hotline to ensure transparent communication during the event.

#### Air Quality

With regard to air quality, the impacts are not considered to significantly differ from other major events in terms of transport-related impact caused by projected visitors as the number of attendees at the event will be lower (i.e. at up to 70,000 people) than the maximum permitted capacity of the stadium of 82,000 people for a typical rugby match.

The potential air quality impacts that would differ from regular events would arise from construction traffic that would be caused by HGVs transporting dirt, Monster Trucks and associated vehicles, and stage set-up equipment to and from the stadium.

The RFU is located within the Low Emissions Zone, and as such, HGVs accessing the premises will be compliant with these standards. In addition, the traffic flow data indicates the daily flow on the A316 as being circa 50,000 and therefore the addition of 200 HGVs will add only 0.4% to this flow. Furthermore, these construction related traffic movements will not take place during peak hours (i.e. Monday-Friday 7am-9am and 4pm-7pm), therefore, congestion will be minimised.

With regard to dust, only clean inert material will be used, the material will be moistened at the source and HGVs will be sheeted to prevent the material drying out and dispersing into the air during transportation. A high volume water truck will typically be used to spray water onto the dirt to keep airborne dust levels to a minimum during the construction, operation and dismantling of the event.

Emissions from the Monster Trucks during the Saturday event (from 3pm – 7pm) are not considered to be substantial given the vehicles would be run on methanol, which is a clean fuel, compared to other fuels such as diesel. In addition, the stadium has an open roof and the nature of the event means that engines will not be revving fully for sustained periods.

The Carbon Footprint Report submitted to the LPA on 28 July 2016 sets out that the emissions generated by the Monster Jam event would be lower than a regular event. The carbon footprint of a regular event is estimated at 218 tonnes of CO<sub>2</sub>e, with 82,000 spectators, whereas the Monster Jam event would represent 185 tonnes of CO<sub>2</sub>e with 70,000 spectators. When the event is delivered, it would represent less than a 1% increase in RFU's overall carbon footprint.

### Contamination

It is noted that the Council's Ecology Officer had no objections to the planning application as set out in the previous Planning Committee Report.

As set out in the submitted 'Sustainability Statement' (dated December 2015), our consultant ecologist, Applied Ecology, has reviewed concerns expressed by the planning committee relating to the Duke of Northumberland River. In relation to contamination, a temporary bund will be created around any area where fuel or oil will be stored to prevent any leakage into the River. Therefore, impacts to the ecology of the surrounding area are considered minimal.

**“1.E Environmental gain to compensate for any environmental cost of development will be sought”.**

While the RFU does not have formal arrangement in place for emissions offsetting, stadium upgrade projects have improved heating, cooling and lighting efficiency. In addition, the RFU has a green funding scheme for community rugby clubs, which has invested over £250,000 in energy efficiency and renewable generation.

### **Policy CP2 (Reducing Carbon Emissions)**

**“2.A The Borough will reduce its carbon dioxide emissions by requiring measures that minimise energy consumption in new development and promoting these measures in existing development, particularly in its own buildings”**

As stated above, the RFU has undertaken a large number of upgrades to improve its energy efficiency. These improved the system efficiencies of many of the stadium's core services and on-going optimisation of heating, cooling, lighting and IT systems.

The RFU is also involved in the government's CRC scheme that requires major consumers to report emissions and cover their emissions through the purchase of allowances to cover their operations. Last year, compliance with this scheme cost the RFU £158,571.

Further, Twickenham Stadium is ISO20121 certified, a certificate of international standard for Sustainable Event Management requiring development, management and monitoring of sustainability issues, relating to event management.

**“2.B The Council will require the evaluation, development and use of decentralised energy in appropriate development”**

This part of policy CP2 is not considered applicable to the Monster Jam proposal.

**“2.C The Council will increase the use of renewable energy by requiring all new development to achieve a reduction in carbon dioxide emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible, and by promoting its use in existing development”**

This part of policy CP2 is intended for new builds and therefore it is not considered applicable to the Monster Jam proposal.

### **Policy CP3 (Climate Change - Adapting to the Effects)**

**“3.A Development will need to be designed to take account of the impacts of climate change over its lifetime, including:**

- **Water conservation and drainage**
- **The need for Summer cooling**
- **Risk of subsidence**
- **Flood risk from the River Thames and its tributaries”**

Given the temporary nature of the proposed Monster Jam event within an established stadium setting, the issues of water conservation/drainage; summer cooling; risk of subsidence; and flood risk are not considered to be applicable. Again, we would like to reiterate that LBRUT (Environmental Health) did not object in the previous Planning Committee.

**“3.B Development in areas of high flood risk will be restricted, in accordance with PPS25, and using the Environment Agency’s Catchment Flood Management Plan, Borough’s Strategic Flood Risk Assessment and site level assessments to determine risk”.**

Again, similar to the reasons given above, this is not considered relevant to the Monster Jam proposal.