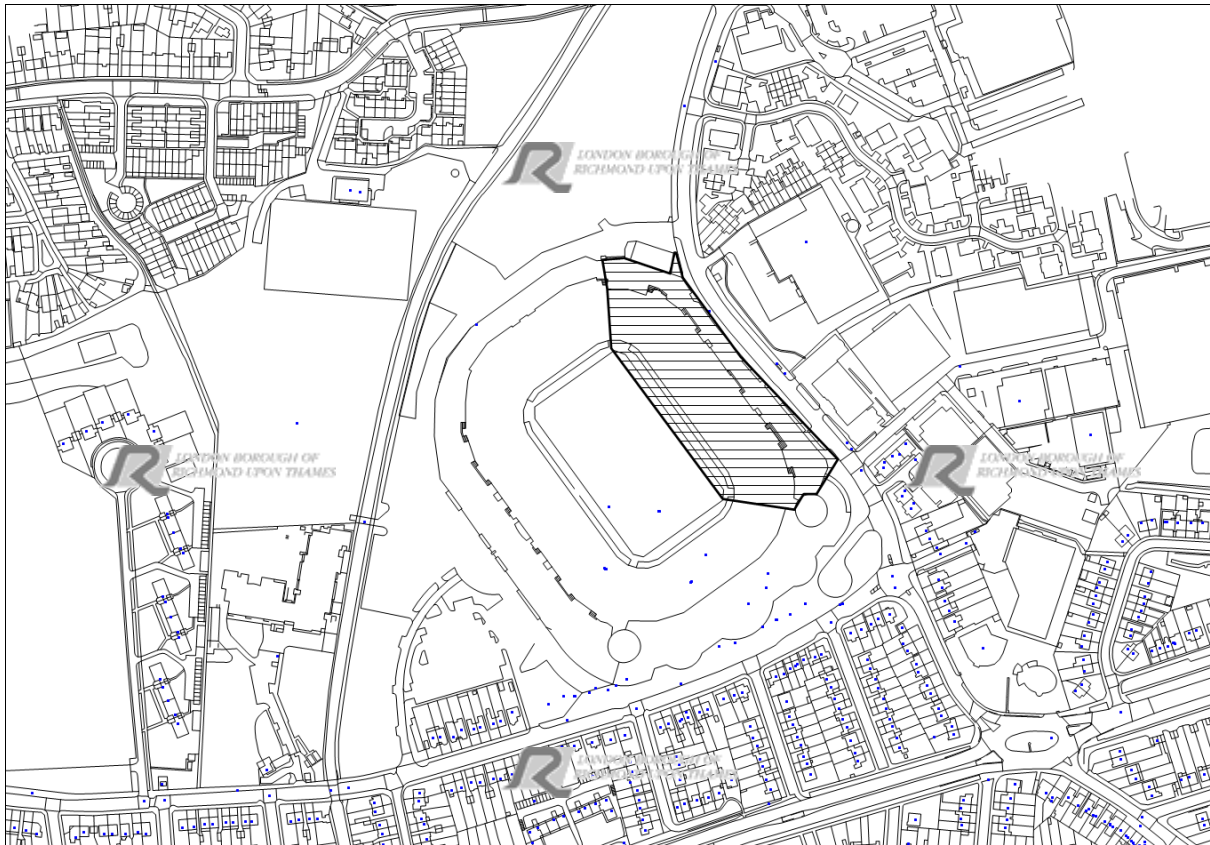


16/2611/FUL
Twickenham Rugby Football Union
Stadium, 200 Whitton Road
Twickenham TW2 7BA

St Margarets and North Twickenham
Ward
Contact Officer:
Ms R Nolan

http://www2.richmond.gov.uk/PlanData2/Planning_CaseNo.aspx?strCASENO=16/2611/FUL



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The Proposal: Structural alterations to, and extension of, the existing RFU Stadium East Stand to accommodate additional floorspace of 11,607sqm GEA for the provision of hospitality (corporate hospitality and debenture hospitality), conferencing and banqueting and other associated works and formation of new access on Rugby Road.

Applicant: Rugby Football Union (RFU)

Application Received Date: 30 June 2016

Development Plan Policies

National Planning Policy Framework (NPPF)

London Plan: The Spatial Strategy (2016) Policies: 2.6, 2.7, 2.16, 3.19, 4.5, 4.6, 4.7, 5.2, 5.3, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 6.3, 6.10, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.13, 7.14, 7.15, 7.19, 7.21

Core Strategy (2009) Policies: CP 1, CP 2, CP 3, CP 4, CP 5, CP 7, CP 8, CP 20

Development Management Plan (2011) Policies: DM DC 1, DM DC 3, DM DC 4, DM HD 4, DM SD 1, DM SD 2, DM SD 4, DM SD 5, DM SD 6, DM SD 7, DM SD 9, DM SD 10, DM OS 2, DM OS 5, DM TP 1, DM TP 2, DM TP 3, DM TP 6, DM TP 7, DM TP 8, DM DC 5, DM SI 2

SPDs/SPGs: Sustainable Design and Construction (2014); The control of dust and emissions during construction and demolition (2014); Character and Context (2014); Accessible London: Achieving an Inclusive Environment (2014); Design Quality (2006); Planning Obligations (2014); Refuse and Recycling Storage Requirements (2015); Sustainable Construction Checklist (2016); Security by Design (2002)

Summary of Application

The application seeks to provide additional space for Corporate and Debenture Hospitality for rugby matches and other Major Events at Twickenham Stadium.

Existing Corporate Hospitality within Twickenham Stadium caters for approximately 6,800 covers plus 500 covers for Debenture Hospitality. 905 of these covers (all corporate) are catered for within the East Stand, 2000 within boxes and the remainder in the rest of the stadium. Other hospitality is provided off-site at locations including Chase Bridge and Cardinal Vaughan Schools and varies from between 3700 to 5100 dependent on the popularity of the match/event. ... The proposals will create additional floorspace to allow approximately 5900 extra covers at the Stadium, all within the East Stand and of which 3670 would be for corporate hospitality and 2,230 would be for debenture hospitality. The resultant total hospitality provision within the stadium will increase to 13,200 covers (6800 within the East Stand, 2000 in boxes, 4400 remainder) from 7310, Hospitality spaces for RFU events would be 10475 Corporate and 2,730 Debenture Hospitality covers). The corporate hospitality facilities are proposed as replacement facilities for the existing off-site locations as such under these proposals the corporate hospitality provision at the site and in its vicinity which totals approx. 11,900 will be reduced to 10,475 and when taking account of debenture hospitality the total official licensed hospitality rises by 788 covers. There is no proposed increase in the seating capacity of the stadium as a result of these proposals as all corporate hospitality and debenture hospitality guests have a reserved seat in the stadium in all scenarios present and future.

It is also proposed that the new space proposed could be used for conferences and banqueting when not in use for Major Events. akin to the South Stand. So far events at the stadium have not exceeded circa 900 delegates.

The proposals comprise 11,607sqm GEA (11,011sqm GIA) of space achieved by extending the East Stand outward toward Rugby Road by circa 10m at levels 3 and above. The hospitality facilities include restaurants, bars, circulation space, service lifts and supporting back-of-house kitchens and facilities.

There are internal structural alterations proposed where the extension joins the existing building structure. The design seeks to maximise the best relationship between the new space/reconfigured space and the pitch (with its associated seating) and natural light from the east. All parts of the proposed development are lower in height than the height of the existing stadium crown. The RFU Store and World Rugby Museum are removed from the East Stand as part of the proposals.

At ground level a new double-height covered concourse is created underneath the extended upper floors. While the building line pushes forward toward Rugby Road the existing boundary line comprising of fencing, gates and turnstiles is generally drawn away from Rugby Road, less so toward the north and moreso to the south, giving over more space to the public realm area outside the enclosed stadium boundary. Turnstiles are proposed to be redistributed over three locations along the boundary instead of two. An

existing crossover on Rugby Road to the south of the site is relocated further south and would now serve as an emergency vehicle access.

There is no proposed increase in car parking associated with the proposals (although some spaces outside the application site but within the wider stadium site are proposed to be converted to Electric Vehicle Charging Points).

There are no proposed changes to the existing servicing arrangements insofar as how they access and egress the site. The proposed development accommodates a service route internally within the undercroft of the building which completes the route that circles the stadium.

Recommendation

APPROVE subject to the conditions and informatives and completion of a S106 agreement,

Site Description



Aerial view of existing site from the north (Mogden Sewage Works in foreground)

The application site ("the site") comprises the East Stand and immediate forecourt area on the Rugby Road side of Twickenham Stadium. The East stand has six levels with existing hospitality on levels 01 (St. George's Suite) and 03 (boxes, Obolensky's suite and Wakefield's suite). The application site forms part of a larger site, Twickenham Stadium which is the national rugby stadium for England originally constructed in 1908 and the subject of redevelopment of all 4 stands more recently from the 1980s through to the 2000s.

The application site is bound to the north by the Gate D access to the stadium site from Rugby Road, the groundskeeper's shed and the northern car park beyond. The eastern boundary of the site has fencing, gates and turnstiles which front onto Rugby Road with its primarily commercial frontage opposite on the eastern side. Diagonally opposite are low-rise

residential properties to the north-east and south-east of the application site primarily on Butterfield Close, Varsity Drive and Rugby Road. The southern part of the site directly adjoins the South Stand of the stadium and the western boundary is formed of the rest of the stadium itself. The site itself is primarily comprised of the seating and circulation areas (including concessions, toilets, staircases and lifts) of the East Stand inclusive of some of the stadium's existing corporate hospitality accommodation and the debenture hospitality accommodation. The World Rugby Museum and a Rugby Store are within the application site. The external areas of the site are comprised of the forecourt area to the east of the stadium including fencing, gates and turnstiles.

The larger stadium site primarily comprises the stadium, its ancillary car parking areas to the north and west provide 1250 car spaces and the energy centre at the western side of the site. There are also a number of other structures at the larger site including the temporary staff accommodation in the North Car Park adjacent Gate D; the maintenance shed just to the north of the proposal site adjacent Rugby Road; storage compounds primarily either side of the energy centre; and, turnstiles, fencing and security fencing generally at the stadium site perimeter though there are some within the site itself as well. The stadium site also contains a number of CCTV locations. Facilities for the parking of 106 cycles are also provided on site.

The stadium building itself includes a mix of uses including a Marriott Hotel, Virgin Active Gym, and the aforementioned World Rugby Museum and the Rugby Store. This wider site is roughly triangular in shape and is bound to north by Whitton Dene (with Mogden Sewage Works further to the north), to the east by Rugby Road and the uses described above, to the south by Whitton Road and its residential properties, and to the west by the Duke of Northumberland River (DNR) with Chase Bridge School and the Cardinal Vaughan Playing Fields on the opposite side of the river (accessible from the stadium via a bridge). The Duke of Northumberland River) Other Site of Nature Importance is adjacent the site. Evidence of the presence of water voles, a protected species, has recently been identified along the DNR next to the stadium site.

On rugby match days the wider stadium site is adapted to include various facilities depending upon the type of match and these may include: live music on a stage, additional stands/food trucks/food trailers offering food and beverages and display marquees. These are primarily located within an area called the West Village located to the west of the stadium and to the east of the DNR. Provision is also made for shuttle bus services and coach parking in the North Car Park.

While primarily known as the home of England's national rugby team, the stadium also hosts a variety of other events including other sporting events, concerts and the Watchtower convention in the stadium bowl and conferences and other events associated with the mix of uses in the building. The seating capacity of the stadium is 82,000 although this is limited to 55,000 for concerts. Approximately 300 people work at RFU on non-event days, this number rises to 3000 on event day.

Twickenham Event Zone' CPZ (R) is in operation on days when very large crowds of above 25,000 people are due to attend events at Twickenham Stadium. This is a one-day Community Parking Zone (CPZ) around Twickenham Stadium. If crowds are above 30,000 the full CPZ is normally implemented covering a large number of roads in the area but where the crowd numbers are around 30,000, a smaller zone is operated covering the roads immediately opposite the stadium.

While the stadium is located within the London Borough of Richmond upon Thames, both Whitton Dene and Rugby Road form part of the borough boundary with the opposite side of both roads falling within the London Borough of Hounslow.

Allocations

- Flood Zone 2
- PTAL 1b (south east corner PTAL 3)

Additionally the following allocations apply to the wider stadium site (but not the application site):

- Area Poorly Provided with Public Open Space (small area to the north-west of the site)
- Metropolitan Open Land (MOL) (area fronting the Duke of Northumberland River to the western boundary of the wider Stadium site)

It should also be noted that the Duke of Northumberland River is designated as MOL and an Other Site of Nature Importance (OSNI)

Relevant Planning History

The site has an extensive planning history with the most recent and relevant planning applications summarised below.

Stand Redevelopment

An application for redevelopment of the north stand to provide a new spectator stand including associated facilities and external works was approved in March 1989. A legal agreement accompanied this permission which secured the transfer of allotment land.

Application 90/1484/FUL granted permission for redevelopment of east side of rugby ground to provide new spectator stand including associated facilities and external works on 7th May 1992. This permission was amended in to include provision of a disabled spectators area at the rear of the lower tier Zone 5 wrap around, disabled emergency exit, lift and toilets under application Ref: 94/1185/FUL.

An application was permitted in November 1993 for the redevelopment of the west stand to provide a new Stand, new accommodation, associated facilities and external works. A S106 agreement accompanies this permission allowing a maximum of 30,000 attendees unless provision for car parking for all attendees within the ground is secured at a ratio of 10 parking spaces per 246 persons within a 1km radius of the centre of the stadium.

An application for the development of the South Stand was granted permission in 2003 to provide a new spectator stand, an RFU shop, ticket sales facilities, hotel, exhibition and conference centre, replacement office accommodation for the RFU, health and fitness club. The application was varied on 2nd December 2004 (Ref: 04/2389/FUL) to increase the maximum capacity of the stadium to 82,000 as well as reduction in floorspace of non-stand developments, hotel, health club, RFU retail store, increased conference floorspace, removal of basement car park and relocation to 200 designated parking spaces in what is known as the west car park and 24 residential units, 10 affordable housing units to the north of the site. This application was subject to conditions relating to the separate uses within the South Stand requiring the offices and retail shop to be occupied by the RFU only ancillary to the main stadium and restricting opening hours of the health and fitness club.

The S106 agreement linked to the South Stand permission required contributions relating to transport including for the refurbishment of Whitton Station. These financial contributions have been received by the Council and thus the associated obligations in the Section 106 Agreement were discharged

The S106 agreement also required the RFU to submit a non-match day travel plan in accordance with the approved travel plan document written by Faber Maunsell submitted with the original South Stand application and amended on 4th Sept 2003. The Councils Transport Officer has confirmed that match day and non-match day travel plans have not been subsequently submitted as required.

A further variation was completed on 5th March 2010 for a non-material amendment for the replacement of 4 aluminium framed windows with 4 louver panels of the same size and replacement of two timber doors with 2 aluminium louvered doors.

This S106 agreement linked to this application prohibited use of the allotment land for Corporate Hospitality at any time except in accordance with permission 96/2776/FUL allowing use of the land for purposes incidental or ancillary to the stadium use.

Concerts

In 2000 the RFU submitted an application for a Lawful Development Certificate to establish legally that the use of the site for an unlimited number of concerts did not require express planning approval. The Council took the view that planning permission was necessary and thus refused the Lawful Development Certificate application. The Planning Inspectorate dismissed the subsequent appeal and the High Court supported this view when the RFU challenged the Planning Inspectorate's decision.

A number of subsequent applications relating to the hosting of concerts were submitted as follows:

In 2001 planning permission was granted, on appeal to hold up to three concerts at the ground between June and October subject to conditions and planning obligations controlling several issues including sound levels, hours of use and Travel Plan undertakings, to minimise car borne traffic. The first concerts were held on 24th August and 20th September 2003, each with a capacity of 50,000, the maximum figure set by the appeal decision.

In 2005 a further application was submitted (ref: 05/0775/FUL) which originally sought to vary condition 3 of the appeal consent to allow the staging of three concerts with a maximum capacity of 65,000. This proposal was amended and planning permission was granted for two concerts on a temporary basis (one year) subject to a legal agreement. A condition secured that capacity could not exceed 55,000. Following this permission two U2 concerts were held at the stadium in July 2005 with both concerts reaching maximum capacity.

In June 2006, planning permission was granted for a permanent variation to condition 3 of planning permission 00/1098/FUL to increase the maximum capacity of concerts from 50,000 to 55,000 (ref: 06/0154/FUL). Following this permission, an Eagles concert was held in June 2006 and two Rolling Stones concerts were held in August 2006.

Later in 2006, an application was submitted to vary condition 2 of the original appeal consent to allow an increase from three to five concerts to be held during 2007 only (ref: 06/3036/FUL). This application was granted permission on the basis that the two additional concerts were held on Saturday and Sundays only. The approved capacity was 55,000. The permission was also subject to the payment of a planning obligation that would provide a sum of £50,000 per concert (for the additional two concerts) in order to fund permanent CCTV cameras and for the review, extension, re-lining and signing of the event day Controlled Parking Zone.

Planning permission was subsequently granted in 2007 (ref: 07/3802/FUL) for a 1 year period which allowed the staging of up to five concerts for 55,000. This permission was implemented in 2008 and 4 concerts were held. This permission imposed a condition which

did not allow concerts to be held on consecutive weekends and they could only be held on Saturdays, Sundays, Bank Holidays and 27 June 2008.

Planning permission was granted by Planning Committee in August 2010 for a variation to condition U09030 (Concerts) of planning permission 06/0154/FUL dated 18 April 2006 to increase the stadium capacity from 55,000 to 60,000 for 1 no. Help for Heroes charity (ref: 10/1849/VRC). This was held on 12th September 2010 and capacity at this concert reached 54,000.

Permission was granted at Planning Committee in March 2012 for the staging of 5 concerts in 2012, ref: 11/2430/FUL. This permission was never implemented as only 2 concerts were held that year.

An application for temporary change of use and erection of temporary seating and stage structures to permit up to five concerts to be staged at Twickenham Stadium was granted for the duration of 2013 only, for 55,000 attendees, concerts to be staged on weekends and bank holidays only. A condition was included on the permission to restrict temporary structures required in connection with the concerts.

Rugby World Cup

14/4197/FUL for the erection of temporary structures for purposes connected to the hosting the Rugby World Cup 2015 Tournament at Twickenham Stadium was approved for a period of 6 months between 1st June 2015 and 1st December 2015. This permission was subject to a condition (NS01) requiring the buildings and works carried out under this permission to have been removed from the site and the site returned to its former condition by 15th December 2015.

Other applications

Application Ref: (11/4079/FUL) granted permission for the erection of an Energy Centre within a compound area adjacent to the western site boundary and the Duke of Northumberland River (DNR). This application was subject to planning conditions requiring a green wall as well as a number of conditions safeguarding the DNR corridor.

Permission was granted on 1st May 2014 for proposed resurfacing of existing storage area, extension to Outside Broadcaster Compound, installation of refuelling point, cycle stands and ancillary works, and removal of outer fence line along western boundary (Ref:13/2130/FUL). The permission was subject to a deed of variation relating to the allotment land. The agreement allows temporary structures to be within the allotment land for the period immediately before and after playing days, not exceeding 14 days in total. Outside broadcasting vehicles are able to remain on the Allotment Land for up to 4 days in total during this period. Further this agreement allows mobile grow lights to be parked on the Allotment land.

A Unilateral Undertaking secured a financial contribution for the undertaking of water vole monitoring surveys and enhancement measures within the Duke of Northumberland River Corridor. This contribution has been received by the Council and monitoring has been carried out.

A S106 agreement accompanying the original planning permission granting consent for the Council allotments to be used as part of the RFU rugby ground restricted the use of the allotment land for purposes incidental or ancillary to the Rugby Ground. Further restrictions include no more than 1,650 private motor vehicles parking on the rugby and allotment grounds together at any one time.

Current applications at the RFU site

15/4218/FUL-Installation of security upgrades comprising the erection of 3 no. new turnstiles, inner ticketing fencing and retrospective permission for installation of CCTV. – pending decision

15/4455/FUL - Installation of security upgrades comprising the erection of peripheral fencing, 2 no. gates and retrospective permission for the installation of CCTV. – pending decision

15/5296/VRC - Application to remove condition number U87040 of planning permission 15/1184/FUL as removal of the tree is no longer required. – pending decision

15/2734/FUL - Temporary change of use and associated earthworks and trackway to permit one Monster Jam event to be held at Twickenham Stadium between 1 June and 30 September in 2017 only. – pending decision

16/4495/FUL - Proposed retention of external temporary surfacing for a fixed time period . pending decision

16/4225/ADV- 1500mm x 1040mm x 10mm Illuminated ATM Surround – pending decision.

Unauthorised Works

It is noted that there is a current enforcement case relating to unauthorised temporary surface and supporting facilities for which consent was given for the duration of the Rugby World Cup 2015 to be removed by 15th December 2015. This surface also relates to an alleged breach of Condition U2825 for outstanding soft landscaping details to be discharged. There is a further alleged breach in relation to kiosks being stored outside of approved storage areas, failing to comply with the requirements of Clause3(a) of the Deed of Variation of the Section 106 date 22nd April 2014 accompanying permission 96/2776/FUL. The Council is in discussions with the RFU on these alleged breaches and an application (ref: 16/4495/FUL) for the retention of the unauthorised surfacing was received on 24 November 2016

Off-site Licensed Operators (OLOs)

Application Ref: 08/4590/FUL granted permission for erection of a maximum of 4 marquee(s) for corporate hospitality on rugby match days at the RFU stadium on 6 occasions each year with parking for 110 vehicles at Chase Bridge School and use of the site for car parking on match days during the year when marquees are not erected. There is a condition attached to this permission restricting the use of the school site for car parking on match days during the year when marquees are not erected to no more than 5 occasions per year.

Kneller Hall (Ref: 03/1868/FUL) was granted permission for temporary erection of marquees for corporate hospitality on the sports grounds for RFU rugby match days on 6 occasions each year with parking for 70 vehicles.

Harlequin FC, Stoop was granted permission renewal of planning permission 00/1886/ful for use of training ground for hospitality tentage on rugby football union match days for up to 7 occasions in any one year (Ref: 03/0057/FUL). The permission was subject to conditions restricting the marquees to cover not more than 80% of the training pitch and be in situ for no more than 35 days in any one 12 month period. The permission is conditioned to restrict use of the hospitality tents to between 8am and 7.30pm, located no closer than 60m to any residential properties.

Application Ref: 09/3273/FUL for the redevelopment of land to rear of Stadium to provide 115 residential units in 3 blocks, car parking for 93 vehicles, associated landscaping works and creation of 2 additional vehicular and pedestrian access points onto Rugby Road was

allowed on appeal. This development has been constructed and therefore permission 03/0057/FUL is no longer implemented.

Land adjacent to self-storage was granted permission by Hounslow Borough Council for erection of a temporary hospitality facility on land adjacent to the self-storage facility and an associated temporary bridge link over Whitton Brook to be used only in association with Autumn Rugby Internationals and the Six Nations Championships associated landscaping works to the land bordering Whitton Brook and Rugby Road and the creation of an emergency means of access for the Environment Agency to the Whitton Brook from Rugby Road (Ref: 00967/30/P16). The permission is subject to a condition restricting the use to the following dates only: Saturday 27 February 2016 Saturday 12 March 2016 Saturday 12 November 2016 Saturday 19 November 2016 Saturday 26 November 2016 Saturday 3 December 2016 Saturday 4 February 2017 Sunday 26 February 2017 Saturday 11 March 2017.

Richmond upon Thames College was granted permission for use of land for siting of tents (except between 18 September 2015 and 31 October 2015) for use on up to 6 days a year for corporate hospitality purposes for a temporary period of five years (Ref:14/3998/FUL). The permission is subject to a condition limiting the number of people on site at any one time to 500. This permission will lapse on 10th march 2020.

Cole Court does not benefit from a specific permission and it is thought that this was undertaken as ancillary to the hotel use.

Cardinal Vaughn Memorial School Playing Fields was granted permission in August 2015 for the erection of temporary structures and temporary use of Cardinal Vaughan Playing Fields as vehicle parking and broadcast compound for the purposes of hosting the Rugby World Cup 2015 Tournament from 5th August 2015 to 16 November 2015. A condition of this planning permission was that the buildings and works carried out under this permission shall have been removed and the site reinstated to its former condition within 3 months of 16th November 2015.

Proposal



Proposed view from Rugby Road looking north west

The proposals comprise 11,607sqm GEA of space comprising an extension to the existing East Stand of Twickenham Stadium toward Rugby Road by circa 10m at levels 3 and above adjacent to the northbound Bus Shelter 0101 on Rugby Road and internal reconfiguration of existing space in the East Stand to allow the new and old spaces to work together. The new space is primarily being used to provide new corporate and debenture hospitality facilities (to include restaurants, bars, circulation space and supporting back-of-house kitchens and facilities) to be associated with rugby matches and other Major Events at the stadium. When not in use for Major Events, in order to maximise the use of the space, it is proposed that the spaces could be used to extend the existing conference and banqueting facilities offer at the stadium. In 2015, Twickenham Stadium hosted 379 events over 196 days on Non Major Event Days. Of these events 90% were attended by 300 people or fewer with 60% attended by 100 people or fewer.

There is no proposed increase in the seating capacity of the stadium as a result of these proposals as all corporate hospitality and debenture hospitality guests have a reserved seat in the stadium in all scenarios present and future. Ticketing for matches at Twickenham is governed by the RFU's Constitution which limits the number of hospitality seats to 11,000. Additionally of the RFU's 15,000 debenture holders, only approximately 500 can access on-site hospitality arrangements presently.

Existing Corporate Hospitality within the Twickenham Stadium caters for approximately 6,800 covers plus 500 covers for Debenture Hospitality. 905 of these covers (all corporate) are catered for within the East Stand, 2000 within boxes and the remainder in the rest of the stadium. The proposals will create additional floorspace to allow approximately 5900 extra covers at the Stadium, all within the East Stand and of which 3670 would be for corporate hospitality and 2,230 would be for debenture hospitality. The resultant total hospitality

provision within the stadium will increase to 13,200 covers (6800 within the East Stand, 2000 in boxes, 4400 remainder) from 7310 covers, Hospitality spaces for RFU events would be 10475 Corporate and 2,730 Debenture Hospitality covers.

While the debenture hospitality is an extended offer above existing in terms of quality of provision and number of guests, the corporate hospitality facilities are meant to be replacement facilities for existing off-site locations.

Presently, corporate hospitality is provided in part off-site at six RFU-sponsored locations which accommodate approximately 4,250 guests (based on 2014/15 and 2015/16 season figures) utilising tents and other temporary facilities. Committed arrangements for 2016/17 and 2017/18 seasons will see between 3,700 and 5,100 covers distributed across off-site locations (depending on the match) by Off-site Licensed Operators (OLOs). While the off-site locations are restricted to a degree by a number of planning conditions (e.g. car parking, number of marquees), these conditions do not restrict the number of guests. The six off-site locations previously used are: Access Self-storage, Chase Bridge School, Kneller Hall, Cardinal Vaughan Memorial School Playing Fields, Richmond upon Thames College and Cole Court. Subject to receiving planning permission for the proposed development, following commencement of its use, corporate hospitality tickets licensed by the RFU would not be available for these venues (or any other off-site venue) through the OLOs (subject to a legal agreement – see Heads of Terms). The covers previously provided at the off-site locations would instead be provided by the RFU at its proposed development subject of this application. Importantly, however, this does not extinguish the existing planning permissions for these sites and as such hospitality in some form, albeit not sponsored or licensed by the RFU, could continue at these locations.

Under these proposals the corporate hospitality provision at the site and in its vicinity which together totals approx. 11,900 will be reduced to 10,475 and when taking account of the extended number of debenture hospitality the total official licensed hospitality rises by 788 covers. There is no proposed increase in the seating capacity of the stadium as a result of these proposals as all corporate hospitality and debenture hospitality guests have a reserved seat in the stadium in all scenarios present and future.

In terms of the extension, a double-height open concourse is created with slab extensions being created above. New slabs are then created at levels 03 to 05 (only the central section of Level 05 is formed as a slab with north and south sections being roof) extended out approximately 10m from the face of the existing lift cores towards Rugby Road. An external but covered roof terrace is created at Level 05. All areas are designed to be inclusive and accessible to all users.

The external façade of the double-height covered concourse (the curved feature and columns) is clad in a mix of porcelain rainscreen cladding and porcelain tiles. Large areas of glazing form the Rugby Road frontage at upper levels complemented by expanses of aluminium shingle rainscreen cladding. Bands of louvres are also integrated for ventilation. The central portion of the upper façade is formed of curtain-wall glazing with fins for solar control. The western return flank wall is comprised primarily of a green wall facing the Duke of Northumberland River.

There are internal structural alterations proposed where the extension joins the existing building structure. The design seeks to maximise the best relationship between the internal spaces and the pitch (with its associated seating) to the west and natural light from the east. All parts of the proposed development are lower in height (proposed height of extension is 30.91m at its highest point of the roof of the covered terrace) than the height of the existing stadium crown (circa 39m).

Turnstiles are proposed to be relocated to the line of the outer wall of the extended floorplates on the edge of the two-storey high covered concourse. The perimeter fence to

Rugby Road is proposed to be semi-opaque double mesh security fencing of approximately 2.7m in height and 3.2m in overall height including signage and is generally pulled back from the existing enclosure line to a greater extent at the southern end of the proposals creating a larger public realm space to accommodate crowds arriving from Twickenham Station via Rugby Road. Details of the fence, turnstile and gate details are subject to a recommended condition.

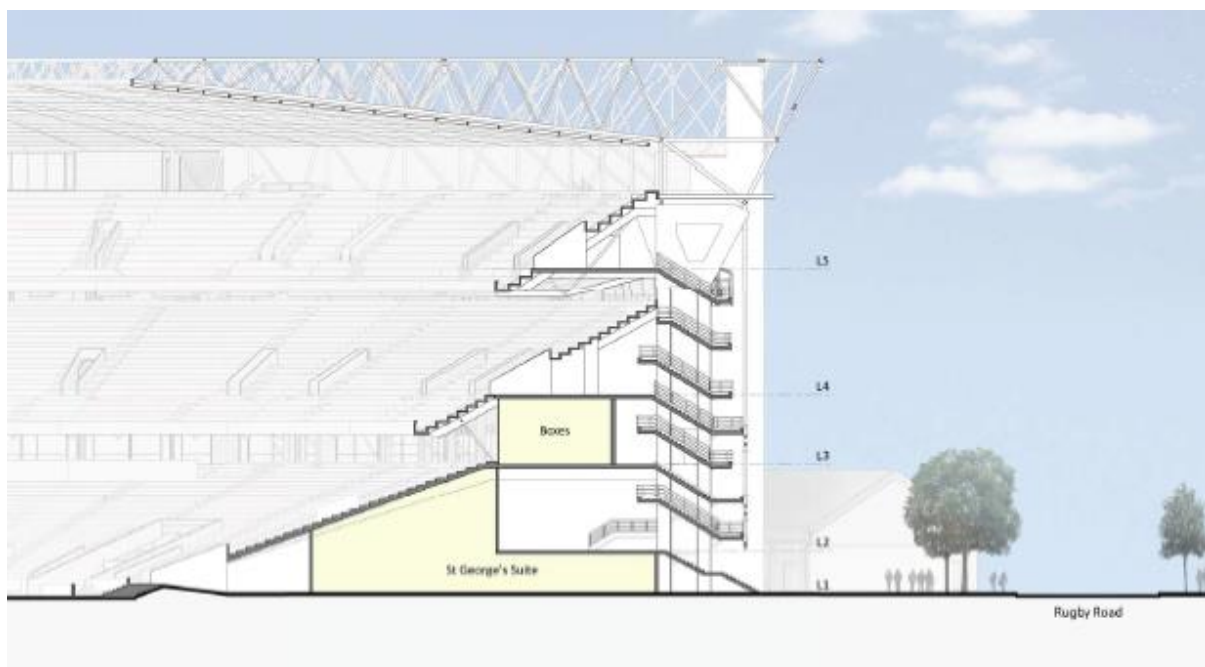
The existing RFU Store, World Rugby Museum and press areas are removed from the East Stand as part of the proposals. It is the applicant's stated intent to relocate the World Rugby Museum to the South Stand but that does not form part of this application. The applicant intends to reprovide the press facilities within the West Stand.

All car parking at the wider stadium site is outside the application site boundary and there are no proposed changes to the number of car parking spaces arising from these proposals, just as there is no change to the capacity of the stadium. The applicant has proposed converting 14 existing standard car parking spaces to Electric Vehicle Car Parking spaces (EVCPs) and future proofing 42 additional spaces for the same.

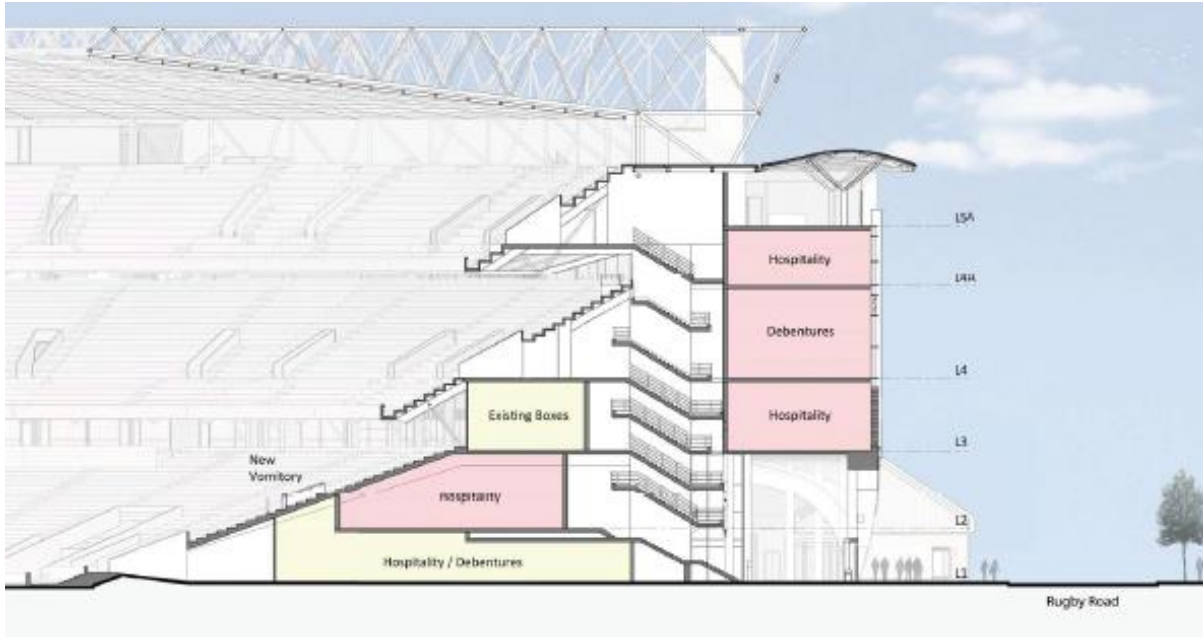
The two-storey clearance in the covered concourse provides clear access around the stadium for high vehicles completing the existing route and is wide enough to allow two vehicles to pass. There are no proposed changes to the way service vehicles access or egress the site (all access gates are outside of the application boundary with the exception of a relocated access/egress on Rugby Road which will be for emergency vehicles only).

The application proposes a Combined Heat and Power (CHP) system as well as photovoltaic panels. Plant is accommodated at roof level to the north and south of the terrace.

Two street trees on Rugby Road are proposed to be removed.



Section through existing East Stand



Section through proposed East Stand

Applicant Consultation

A Statement of Community Involvement (SCI) was submitted with the application. It notes that pre-application meetings were undertaken with the Local Planning Authority; Dr Tania Mathias, MP; Lord True, Leader of the London Borough of Richmond upon Thames; as well as with each of the local sites currently used by the RFU's affiliates for off-site hospitality facilities. There were also two public exhibitions held in May and June 2016 at Twickenham Stadium with notification of these events made via mailout to 31,000 local households, advertisements on 27 May in the Hounslow Chronicle and Richmond and Twickenham Times and letters sent to local stakeholders, political representatives and community groups. Details were also available on the RFU website. A stakeholder preview was also held prior to the May exhibition. The SCI reports a total of 53 guests attended the events and 17 feedback forms were received and some of the findings were:

- The majority of responses on the proposed design of the East Stand were positive (88%) with 38% commenting very attractive (the top response).
- 67% of those who provided feedback on the management of construction raised concerns they would like the RFU to address during construction such as traffic management (33%)

Public and Other Representations

The following provides a summary of responses received to the consultation exercise undertaken by the Local Planning Authority:

Support	Object	Comment	Total Number of Representations Received
1	13	0	14

Summary of Support

One supporting representation was received from Amsterdam.

Summary of Objections

Thirteen representations were received objecting to the proposals. One representation was received from the Butterfield Close Residents' Association and a number of Butterfield Close

residents also made individual representations. Other objections were received from other local residents, Cardinal Vaughn School and FORCE as summarised below:

Topic	Matters Raised	Comment
Unauthorised car parking	Visitors to the stadium use the private car parking associated with Butterfield Close residential properties and Rugby Road properties notwithstanding a number of measures residents have tried (signage and marking of spaces); Butterfield Close residents' car park is now abused daily by gym goers who have also threatened our ground maintenance staff when confronted about their unwelcome presence on private land; on street parked cars using the development block access to residents' car park; seeking RFU provision of gates for the residential development	Stadium capacity and consequent on-street car parking demand are unaffected by this proposal
Anti-social behaviour	Abuse from stadium patrons; public urination on private property; threatening behaviour of stadium users; vast expansion in space allocated to public bars could increase the problems of drunkenness, street urination, and rowdiness when a match takes place; the council needs to consult the Borough Commander about the application and his thoughts on possible conditions/legal agreements	Stadium capacity remains unchanged by the proposals, while corporate hospitality facilities form part of the proposals these are likely to be mainly replacement facilities for existing off-site facilities; additional debenture hospitality is provided on-site;
Litter	Litter management scheme to be associated with new development	Refuse arrangements are subject of a recommended condition and given all hospitality is being brought on-site there should be less opportunity for litter off-site
Impact of increased use of the stadium	Proposals to develop the East Stand and to increase the scale of the operation will only serve to further increase and exacerbate the existing problems that we are experiencing; injurious to private facilities and right to retain use of private residential property for exclusive use of residents	Stadium and car parking capacity for major events are unaffected by this proposal; while additional conferencing facilities would be available as a dual use of the space relevant assessments of impact have been supplied (e.g. transport) and are discussed in detail in this report
Traffic generation		Maximum stadium and car parking capacity are unaffected by this proposal; a full Transport Assessment

		has been provided and is discussed in detail below. Travel Plans are an agreed Head of Term and will be required by legal agreement.
Noise disturbance and stress		A Noise Impact Assessment has been provided which demonstrates negligible effects and potential benefit on noise emissions from within the stadium bowl as a result of the more solid façade compared to the existing situation. Noise will be controlled by a recommended condition.
Adequacy of parking		Stadium and car parking capacity are unaffected by this proposal. Travel Plans will be required by legal agreement as an agreed Head of Term.
Landscaping	Need to ensure there is a whole site-landscaping strategy and further work done to protect the Duke of Northumberland corridor and the protected species of water voles that live there; support the recommendation of the Ecological Assessment for the use of native trees and shrubs in landscaping, trellises with pollinator-friendly climbing plants and the consideration of green walls in appropriate areas of new construction; would like to see these measures extended to construction that has been undertaken under previous planning applications	Given the restricted nature of the application boundary there is little opportunity for soft landscaping. Details of hard landscaping form part of the application. Following negotiations, the applicant has proposed a green wall to the western flank return wall of the proposed development facing the DNR. Details of the green wall including planting will be secured by a recommended condition. A contribution equal to the CAVAT value of the two street trees being removed forms a Head of Term to be used for replacement trees within the borough. Details of previous applications are beyond the scope of this planning application.
Lack of light and overshadowing	Lack of light will lead to depression and exhaustion	A Daylight and Sunlight, Overshadowing and Solar Glare Report has been submitted which demonstrates that any impact on surrounding residential properties is acceptable.

Loss of privacy		Separation distances from the development to the nearest residential property are approximately 50m to dwelling and 30m to private external amenity space which is considered adequate to address any matters of overlooking/loss of privacy.
Smell		An Odour Assessment has been submitted which demonstrates that, subject to mitigation measures controlled by a recommended condition, the development will not result in an unacceptable impact in regard to odour.
Off-site Management	Match day plans to include traffic management, waste disposal, security and crowd management; lack of support from RFU to address issues	A Major Event Day Travel Plan is included as a Head of Term to form an obligation within the legal agreement, on-site refuse arrangements are subject of a recommended condition; crowd management features (digital directional signage) are proposed above the turnstiles
CCTV Cameras	RFU already have illegal CCTV cameras on Whitton Road, RFU cannot be allowed to disregard local residents for its own interests anymore	CCTV cameras on Whitton Road are currently the subject of assessment under a separate planning application.
Impacts on Cardinal Vaughan Memorial School	Immediately next to the stadium and pupils education will be significantly disrupted by impact of major building works; long term provision on education detrimentally impacted by expansion of RFU site	A Construction Management Plan and Construction Logistics Plan have been submitted and recommended conditions will be utilised to minimise any disturbance to neighbouring uses, the local transport network, ecology and habitat etc.
Overdevelopment	Overdevelopment of the site causing significant disruption and detriment to the local community (residents and businesses)	It is considered that there is no harm in terms of appearance and neighbour amenity from this scale of development and the impact on local town centres has been assessed as part of this application with no significant harm identified.

Design	Pushing the development to the edge of the public footpath is likely to result in congregation of visitors on public footpath and roads leading to longer road closures greater negative impact on locals and increasing negative impact of local economy; does not match the South Stand and is not stepped giving an overwhelming cliff-face design; conference facilities need to be taken out and relocated to the North or West Stands to allow for stepped design	While the development is pushed forward the enclosure line is generally drawn back providing additional space in the public realm adjacent the pavement. The design has been carefully considered through a pre-application process and is considered acceptable by the LPA. The conference facilities are simply a dual use of the same space not additional space.
Failure of the RFU to comply with conditions and legal agreements of previous planning permissions	Much of the former allotment site now degraded to hardcore; need to ensure there is a whole site-landscaping strategy and further work done to protect the Duke of Northumberland corridor and the protected species of water voles that live there; need to ensure compliance with previous planning permissions before granting new ones	The proposed development is to the east of the stadium and the DNR forms the western boundary of the wider site so the development will not be directly adjacent the DNR. Notwithstanding this, construction-related areas would be located in the North Car Park and a CMP, CLP and CEMP would be required by recommended condition to minimise impacts of the development during construction; compliance with previous planning permissions is a separate matter to determination of this planning application
Impact on Metropolitan Open Land	may also make it harder to preserve the open outlook of the Metropolitan Open Land on the West side of the Stadium as this will need to be factored in. The maintenance shed looks very incongruous next the proposed East Stand Development and fear that if the council grant permission there will be another application almost immediately to move the maintenance shed onto the MOL area. Thus there is foreseeable cumulative impact.	The proposed development is not located within MOL. The proposed facade facing the MOL is comprised primarily of a green wall with louvered vents and is considered an improvement on the existing situation. There is a Head of Term to be included in a required legal agreement for best endeavours for the removal of the shed to an area of the site, such site to be located outwith the MOL.
Additional toilets	need for extra toilets after matches and more alleyway gating; public toilets could be incorporated into the	180 additional toilets and 100 additional urinals are being provided within the

	<p>new riverside development (site of old swimming pool) and that a contribution should be sought to cover some of the construction and running costs; current use of mobile toilets and urinals has a detrimental impact on the street scene, and in many cases modesty is not preserved. Some pop-up urinals (urilift) could be installed along London Road, Twickenham town centre and Whitton High Street to reduce the numbers of temporary ones needed</p>	<p>proposed East Stand.</p>
<p>Impact of additional conferencing facilities</p>	<p>Increase in conference space is going to lead to a rise in demand for car parking spaces - where are the cars going to be accommodated and will a controlled parking zone be introduced (who should pay for it); unlikely that a conference centre geared to business events is going to have most visitors attend by public transport; would like to see agreements for car parking to be provided for delegates at Tesco Mogdan and the Aragon Road car parks to avoid having to turn all the land around the stadium into one enormous car park as most of it is supposed to be Metropolitan Open Land</p>	<p>The submitted Transport Assessment has demonstrated that there is sufficient car parking to support the scenarios required to be tested by the Local Planning Authority and the Council's Transport Officer has not raised issue with the assessment.</p>
<p>Loss of Trees</p>	<p>Little public benefit in chopping down trees to increase bar space; no one else would be allowed to do this.</p>	<p>There is an agreed Head of Term for full CAVAT value of the two trees to be lost to be made as a contribution through the legal agreement to be used specifically to fund replacement trees.</p>
<p>Alcohol</p>	<p>Need to consult the public health committee of the council as they have a Richmond upon Thames Community Safety Partnership Plan and as part of this a 'Borough Alcohol Strategy'. The RFU could be asked to do more to tackle the 'bing drinking' culture in rugby; whether there needs to legal conditions to ensure that children do not see adverts for alcohol inside the grounds; measures to restrict alcohol consumption; points to the need for the council to undertake an alcohol impact survey of the proposals as evidence suggests that the central</p>	<p>This is a licensing matter, not a planning matter.</p>

	Twickenham areas is already at 'saturation point' and this will add to it	
Impact on Twickenham town centre	Out of town development and the impact on Twickenham town centre should be looked at by means of a professional report; more people eating and drinking at the rugby ground will likely result in business closures in Twickenham town centre and investment will be undermined	A full assessment of town centre impacts has been provided as part of the application within the Planning Statement. Subject to recommended conditions and a legal obligation for signage/town centre promotion, the Local Planning Authority is satisfied that the development would not cause unacceptable harm to the town centre.
Contributions and Public Benefit	Historic contributions the RFU have made to the local area is peanuts - and in no ways compensates the area for the massive disruption they cause; if the council grants permission they are effectively giving them a planning windfall as this type of development would never normally be granted and more of the gain should be captured for public benefit	The application is considered on its planning merits and contributions are only sought where required to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development (NPPF paragraph 204).
Plant	Strongly opposed to any development in the stadium which has the effect of increasing the load through the current energy centre, thereby causing any further increase in noise levels, emissions, light pollution or hours of operation of the centre; any further plant or equipment should be located away from the DNR frontage and much nearer to the stadium including the location of the proposed Combined Heat and Power generator and the proposed photo-voltaic array; plant and equipment mounted on any part of the stadium roof should not contribute any increase to noise and light levels on non-match days	Combined Heat and Power (CHP) and Photovoltaic Panels are proposed at the stadium to provide energy for the development (and to an extent to other elements of the stadium). Roof top plant is enclosed. Only the energy for heating and chilled water within the East Stand will be provided from the energy centre and there are no proposed changes to the energy centre.
Construction	Support the location of the delivery and construction compounds on the Rugby Road side of the North Car Park rather than on the DNR side; concerned to ensure that no damage to the DNR pathway nor pollution of the DNR should result from these construction works and supports the recommendations of the Ecological Assessment that no works be carried	Construction-related compounds would be located in the North Car Park and a CMP, CLP and CEMP would be required by recommended condition to minimise impacts of the development during construction.

	out within 10 metres of the bank top of the DNR and that the construction compound fencing be located at least 15 metres from the bank top.	
Duke of Northumberland River	RFU to recognise the strategic value of the DNR corridor as a long-term community asset	The proposed development is on the other side of the stadium to the DNR. The DNR to be protected during construction by recommended conditions for CMP, CLP, and CEMP. The part of the development facing the DNR is primarily a green wall with louvered vents.

FORCE:

Previous permissions

The RFU has not fully discharged its obligations under the previous planning consent adjacent to the DNR (13/2130/FUL). FORCE believes that these obligations must be fully discharged prior to any new planning permission being approved. The RFU has failed to recognise the importance of the Duke of Northumberland River and reneged on previous commitments.

Energy and related impacts

FORCE is strongly opposed to any development in the Stadium which has the effect of increasing the load through the current energy centre, thereby causing any further increase in noise levels, emissions, light pollution or hours of operation of the centre. FORCE believes that any further plant or equipment related to development of the Stadium should be located away from the DNR frontage, and much nearer to the Stadium. This includes the location of the proposed Combined Heat and Power generator and the proposed photo-voltaic array. Plant and equipment mounted on any part of the Stadium roof should not contribute any increase to noise and light levels on non-match days.

Construction

FORCE notes from the Construction Management Plan the proposal to use the North Car Park for construction compounds and temporary car parking. FORCE supports the location of the delivery and construction compounds on the Rugby Road side of the North Car Park rather than on the DNR side. FORCE notes that the construction access is adjacent to the DNR pathway access at Whitton Dene, and that the temporary car park is proposed to be situated along the length of the DNR pathway. FORCE is concerned to ensure that no damage to the DNR pathway or pollution of the DNR should result from these construction works. FORCE supports the recommendations of the Ecological Assessment that no works be carried out within 10 metres of the bank top of the DNR, and that the construction compound fencing be located at least 15 metres from the bank top.

Biodiversity

FORCE notes the assertion of the Ecological Assessment that “Although the DNR has bank habitat which might be suitable for water voles, there are no historic records of its presence.” LBRuT has undertaken several surveys of this reach in the last two years as part of the Duke’s River project and has mapped out a large network of water vole burrows and thereby established that there is a significant and established water vole colony along this reach of the river. FORCE supports the recommendation of the Ecological Assessment for the use of native trees and shrubs in landscaping, trellises with pollinator-friendly climbing plants and the consideration of green walls in appropriate areas of new construction. FORCE would like to see these measures extended to construction that has been undertaken under previous planning applications, the conditions of which remain to be fulfilled, especially with regard to the energy centre.

Comment: the discharge of planning conditions not relevant to the determination of this application are a separate matter; the Energy Centre provides energy for the stadium as a whole which is its intent and there are existing conditions in place as per planning permission 11/4079/FUL which control the noise of the mechanical plant to no more than 5db above background noise; CHP and PVs are located at the stadium away from the DNR frontage and will be subject to appropriate controls on their impacts; the draft Construction Management Plan submitted with the application is not recommended for approval at this time and a revised Construction Management Plan is required to be submitted in advance of commencing works on site by a recommended condition - such measures will be reviewed at that time; comments on biodiversity are noted and a green wall is now included in the proposals; the determination of this application cannot extend measures to previously determined applications where not relevant to the current application.

Consultation

London Borough of Richmond upon Thames

Air Quality: no objection subject to conditions.

Comment: Conditions recommended.

Daylight/Sunlight/Overshadowing and Solar Glare: Loss of daylight and sunlight would be within the BRE guidelines for all the nearby dwellings, and is assessed as negligible. Loss of sunlight to gardens would also be within the BRE guidelines, and assessed as negligible. In regard to disability glare (caused by solar glare reflecting off the proposed development), the main concern is for motorists travelling south down Rugby Road (Viewpoints 2, 4 and 5 of the applicant's report) as motorists will be travelling directly towards the building. Sunlight can be reflected in some cases within 10 degrees of the driver's line of sight which indicates a significant risk of disability glare. The applicant's report states that instances of solar glare would be transient, lasting only a few seconds for the motorist, however, BRE advise at 30 miles per hour, in 3-4 seconds a car would travel 40-50 metres, giving plenty of scope for an accident to occur. While the applicant has taken further measures to reduce the reflection from the glass to below that from normal double glazing, including specific measures in the worst affected area, and suggested a Stage 2 Road Safety Audit to identify any residual effects with suitable mitigation measures to be agreed if required. BRE have confirmed this is a sensible approach subject to the timing of the Safety Audit being inclusive of the times of year when glare is predicted to occur but not leave it too long in order to minimise risk to the public.

Urban Design: generally acceptable from an urban design point of view; an improvement on the rather utilitarian existing façade on Rugby Road; fenestration good with noticeable reveals and design variations; views from most viewpoints appear to likely be either improved or neutral; the retention of the groundskeeper's shed strikes a discordant note in the view from the north; sample board is acceptable; increase in slab paving is positive; tree removal is regrettable - replacement tree planting should be provided elsewhere in the vicinity; electronic signage is shown by the gates which looks quite neat; do not support the additional 'banner' signage shown in the Rugby Road visualisation fixed to an RFU light column.

Comment: Materials conditioned; contribution for replacement trees to be secured through legal agreement; banners do not form part of application.

Ecology: no objections subject to conditions

Comment: Conditions recommended.

Energy and Sustainability: An 11.97% reduction in carbon emissions has been made within the East Stand. With the addition of savings made to the rest of the stadium through

the CHP and PV this saving is increased to 23.01% against a policy target reduction of 35% (against Building Regulation Part L 2013) for this element of the building which has not been met. The target should be achieved on-site and a contribution to the Carbon Offset Fund is a last resort. The National Calculation Methodology results in a carbon offset contribution of £76,932 based on site usage over 30 years. An 18.16% reduction against a policy target of 20% has been made in carbon emissions through the addition of CHP and PV, when stadium wide savings are taken into account, for the East Stand. If only savings within the East Stand were taken into account this would be 6.43%.

The refurbished element has reduced emissions by 19.6% when compared to the existing building. There is no requirement for this element.

These improvements to the rest of the stadium will not take place if the East Stand does not go ahead. In consultation with the Council's Policy officer, it was therefore felt that it is acceptable to count the stadium wide savings in emissions towards the East Stand energy strategy, so long as the savings were apportioned to identify where they had been made.

Conditions and legal obligations recommended.

Comment: These comments are addressed in Professional Comments: Energy and Sustainability. Conditions recommended and legal obligation included in Head of Terms.

Environmental Health (Noise and Odour): No in principal objections subject to conditions.

Comment: Conditions recommended.

Flood Risk and Drainage: Within Flood Zone 2, but very close to Duke of Northumberland's River (non-tidal), which is Zone 3a. Surface-water run-off is already restricted with an underground storage tank to the north of the stadium. No changes in rainwater drainage are proposed as there is no change in run-off. Although the Micro Drainage runs indicate Flood Risk, the stated water levels would not cause flooding in Rugby Road or the neighbouring properties. The FRA can be approved.

Policy:

Allocation and Economic Impact

Within the draft Local Plan the emerging site allocation SA 11 refers to the redevelopment of the East Stand and provides conditional support for additional facilities including hospitality "provided that they are complementary to the main use of the site as a sports ground." The justification of the draft policy goes on to say that "The applicant will have to demonstrate that additional facilities do not lead to harmful impacts on the vitality and viability of Twickenham centre." Additional information was requested in respect of: impacts on town centres including potential diversion of trade and bringing forward allocated sites; capacity arguments; clarity on who has access to hospitality and how long it would be open pre and post-match; and additional justification for why it needs to be on-site. Such information was provided to the satisfaction of officers such that there is no in principle objection to the proposal from an economic impact standpoint subject to conditions and obligations restricting support for off-site hospitality locations, restriction on post-match operating times and improved linkages/signage to town centre.

Sustainability

Overall, the sustainability credentials of the proposed East Stand redevelopment are poor and largely non-compliant with policies CP2, DM SD 1 and DM SD 4 and the Sustainable Construction Checklist score is low. However justification is provided within the report and further concessions have been made, such as the introduction of a green wall. The inclusion of CHP within the Stadium is positive. The applicant will provide a carbon offset payment to the Council's recently approved Carbon Offset Fund which will [help to fund beneficial carbon reduction projects elsewhere in the borough in order to 'offset' the extra emissions from the stadium expansion](#). No formal policy objection is raised subject to conditions and obligations.

Green Wall

The applicant has demonstrated that a green roof is not technically feasible on the lightweight roof structure. The provision of a green wall is policy compliant.

Museum

Any alterations in terms of the cultural offer of the existing museum and the benefits to tourism and the local economy would need to be assessed, and its loss would be resisted.

Comment: Conditions recommended and obligations to be secured by legal agreement. The applicant's stated intent is to replace the museum within the South Stand but the replacement proposals do not form part of this application.

Safety at Sports Grounds: no comment received.

Transport: Servicing Management Plan would be required; no objection to the crossover on Rugby Road being made smaller but there are no plans showing the size of vehicle that they will have accessing and that it can do so; will a s278 be needed for any works to the crossover or will our contractor carry out the work (any other works to public highway); Visitor Travel Plan required; any tree replanting proposed for the trees that will be removed; stacking of vehicles coming into gate D for servicing or construction should not result in any obstruction of the public highway - to address this through the management plans; no construction related activities should occur on match/event days such as concerts; robust travel plans for staff/visitors, whether major or non-event and continued travel planning (non match day staff/visitors, match/event day staff/visitors and construction operatives) as drafts are unacceptable in current form; and, any information on the west village use.

Draft Construction Management Plan

Does the whole footway on Rugby Road in front of the East stand need to be closed for part of the works? Would prefer that 2.0m was left open to pedestrians. What is the impact if any on bus stops? A condition survey of public highway will include carriageway as well as footway.

Solar Glare

Observed vehicle speeds are often in excess of 30mph on Rugby Road, the road carries a large number of HGVs and also has a single controlled crossing point outside of William Web Ellis House which may also be compromised by glare. A driver being blinded for several seconds by sunlight is an unacceptable risk in this location. Particular issue with viewpoints 2 (as drivers will try to overtake a stationary bus at the bus stop and the solar glare may blind the driver to vehicles coming the other way or even another bus) and viewpoint 5 (Rugby Rd frequently has traffic back up past the East Stand so drivers could be coming off the bend blind to stationary traffic). Following further proposed mitigation measures including a Stage 2 Road Safety Audit to assess any residual impact following mitigation with additional mitigation measures required to address any impacts identified the officer is satisfied subject to recommended conditions including covering of glazing for the maximum amount of time to minimise risk.

Comments: Service Management Plan required by recommended condition; vehicle tracking subsequently provided and is acceptable; applicant satisfied for works to be carried out either way; only other highways works are making good the existing crossover and temporary relocation of bus stop and pedestrian crossing; Travel Plans for staff and visitors to be required by legal obligation and included in Heads of Terms; a contribution toward replacement trees has been agreed and forms one of the Heads of Terms; no vehicle stacking at Gate D included in recommended conditions; restriction on construction activity on event days included as recommended condition; west village provides food, beverage and entertainment facilities of varying degrees related to events at the stadium and is outside of the application site. The applicant has advised the whole footway would need to

be closed during construction (but a 2m wide path opened on event days) and the bus stop temporarily relocated; condition survey included in informatives; solar glare conditions are recommended as advised by officer

Trees: The Council do not allow the removal of Council owned trees to facilitate development. With the loss of significant highway trees, we would require a Section 106 agreement to the full CAVAT values (the trees have been valued as assets, using the CAVAT valuation system which gives values of T2-£42,288 and T3-£44,890) to ensure future tree planting. Without the tree replacement contribution we would not be able to recommend approval of the tree loss.

Comment: Contribution to be secured by legal agreement.

Other Consultees

LB Hounslow:

Access

The proposals include the reduction of the dropped kerb currently located opposite Rugby House - would question why this dropped kerb is still required at all and whether it could be relocated further to the north to avoid conflict with the access opposite. On this basis, this Council objects. It would appear there are no other changes to the carriageway, but we would wish the Applicant to confirm this and would wish to comment further if there are any such changes.

Cycle Parking

No additional cycle parking is proposed as part of the proposed development. The Council considers that the development should aim to provide cycle parking to encourage the use of staff cycling to and from the proposed development. As it does not, this Council objects.

Trip Generation

Match Day - The number of visitors to the stadium is unlikely to increase as the capacity of the stadium is remaining as per the existing. The impact of supporters attending the matches will be further staggered as a result of the proposed development, with the facilities allowing more people to arrive early and depart later.

Additional staff will be required to assist with the catering, however with no extra car parking available, the majority of these trips are likely to be via sustainable modes and therefore not expected to impact significantly upon the highway network.

During match days, the comprehensive measures in place for the existing operation of the site should ensure that there is no significant impact upon the local road network.

Non-Match Day - The non-match day trip generation could result in additional trips to the site and the Transport Assessment provides a Sensitivity Test showing both 300 capacity and 900 capacity events taking place at the same time. However, the size of the proposed development suggests that this number of visitors (1,200) could be exceeded and this Council considers that further information should be sought to demonstrate why this is considered to be worst case. In the absence of such clarification, this Council objects on the basis that the application has not shown that the site and the surrounding transport network have capacity to meet this demand on non-match days. Notwithstanding this, the assessment still shows a substantial number of visitors arriving at the site by rail (42%). Without the stewards and signage associated with match days, there could be difficulties for pedestrians navigating their way to and from the stations safely. As such we request a contribution to pay for a legible London wayfinding sign at Hounslow (*Network Rail*) Station by means of a Section 106 agreement or equivalent provision. Construction Logistics Plan

The routes in the Construction Logistics Plan are yet to be agreed. However, we would expect the construction traffic to approach from the south via A316 Chertsey Road and the Council objects if this is not the case.

Comment: The access in question is for emergency vehicles only and as such will not be frequently used; the only other change to the carriageway is removing and making good the existing access (there are additional temporary measures during construction); as the development does not increase the capacity of the stadium no additional car or cycle parking is being provided; the scenario tested is as agreed with officers of the Local Planning Authority; the transport work identifies that on non-match days there would be circa 12 people arriving via Hounslow train station which was considered insufficient to justify the contribution requested; a response was issued by officers to LB Hounslow seeking its further comments but no further comment was received.

London Fire Authority: no comment received.

Metropolitan Police (Design Out Crime): The crime issues that affect the stadium are theft person and the consumption of alcohol within the stadium leading to aggressive and possibly violent behaviour. Also the increase in the number people who will be entering the stadium during fixtures, even if they will not be spectators within the stadium bowl and only using the new facilities. With the increase of onsite facilities there should be robust controls to ensure those who are not ticketed for access to the bowl as a spectator are not able to gain access to the bowl, thus affecting the stadium's capacity.

The careful management of the increase in numbers entering the stadium is vital, especially with increased enclosure of under stand walkways. Access should the stadium should be enhanced through an increase in the number of turnstiles and signage to manage the approach of spectators.

Concerns over the enclosure of the current external access stairway. Once they become enclosed sufficient access and alternative routes should be in place in the event of an incident within the enclosed section of the stairs.

The increase in capacity will have a significant impact on the residents who are neighbours to the stadium. With significant works being carried out at neighbouring sites, including Richmond College, plans should be in place to limit any increase in impact on local residents, which includes the possible increase in parking requirements and the extended hours of the operation of the stadium for events.

There are concerns from the borough over the increase in facilities for the provision of alcohol; the Borough licensing officer has been asked to make comment.

Comment: There is no proposed increase in the stadium capacity arising from these proposals; although the number of turnstiles on the Rugby Road frontage is reduced from 45 to 43 they are dispersed over three locations instead of two and include digital wayfinding signage above for crowd management; there are a number of internal access and egress routes including connections through to other stands; the potential impacts of the development have been assessed as part of the application and insofar as much as these are planning matters they will be controlled as required by recommended conditions and/or legal obligations; no comment has been received from the licensing officer.

Thames Water: no comment received.

TfL: Subject to the comments below being addressed, the proposal as it stands would not result in an unacceptable impact to the Transport for London Road Network (TLRN):

Cycle Parking

No additional cycle parking but there will be additional staff trips as a result of the extension as such request the applicant provides more information about current cycle parking spaces and their usage to assess if more need to be provided.

Travel Plans (TP)

Travel Plans to provide more information on how these figures were reached, commitment to undertaking surveys that are TRICS compliant in the periods of 1, 3 and 5 years of occupation, sets out objectives that reflect current policy and guidance in relation to travel

plans directly linked to targets and should be supported by measures required to achieve them, an appointed TPC is welcomed, it is required by ATTrBuTE that sufficient time to spend on the TP is allocated for them with information on this to be provided in the TP, more information on how the TP will be implemented, funded and monitored; existing Visitor TP should be updated to reflect changes the proposal will bring to the stadium.

Construction Logistics Plan (CLP) and Construction Management Plan (CMP)

Applicant to provide more information on the proposal in the CLP and CMP, for instance the size and nature of the scheme; TfL appreciates that deliveries will be undertaken outside peak hours where feasible; requests the use of banksmen who will be present at all times and designated Gatemen to manage deliveries, pre-bookings and approve prior to arriving and assist pedestrians and cyclists crossing the site access; the applicant has provided a construction programme in the CLP with stages and indicative dates but request the applicant provides an overview for each stage of construction; deliveries will be consolidated where possible; commitment to using wheel washing facilities where necessary to keep the public highway clean; satisfied the applicant has demonstrated that vehicles will be able to access and egress from the site in forward gear; contractor vehicles should include side-bars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with cyclists and other road users and pedestrians on the capital's roads; strongly recommends the use of construction contractors who are registered on the Fleet Operator Recognition Scheme (FORS). If contractors have already been appointed and are indeed FORS accredited, the CMP/CLP should be amended to reflect this.

Footways and Carriageways

The footway and carriageway on the A316 Chertsey Road must not be blocked during the extension. Temporary obstructions during the extension must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A316 Chertsey Road.

No skips or construction materials shall be kept on the footway or carriageway on the TLRN at any time. Should the applicant wish to install scaffolding or a hoarding on the footway whilst undertaking this work, separate licences may be required.

Conditions

It should be conditioned that off-site hospitality areas will no longer receive corporate hospitality tickets from the RFU. It is TfL's understanding that non-major event day activities may occur both within the South Stand and the East Stand , thus it should be conditioned that these are scheduled and do not coincide so as to ensure that there is no major uplift in the trip generation as estimated by the applicant.

Comment: The details of Travel Plans (including a review of cycle parking) will be required by legal agreement; a CLP and CMP are required by recommended condition and will address many of the above matters; the note on footways and carriageways is recommended as an informative; a legal obligation is being negotiated to secure no future support of off-site hospitality locations (except during any future hosting of the Rugby World Cup); a condition is recommended to address the scenario regarding Non-Major Events occurring in the East Stand at the same time as other parts of the stadium .

Amendments

Since the original submission of the application the following amendments have been made:

- Addition of a green wall to the western elevation flank wall at the north end of the development;
- Provision of additional photovoltaic panels (subject to planning permission and outside the application site but on the South Stand of the stadium adjacent the development);

- Specification of Electric Vehicle Charging Points (subject to planning permission and outside the application site but within the stadium car parks serving the development);
- Amendments to Construction Logistics Plan to respond to consultee comments;
- Alterations for clarity on provision of accessible wheelchair seating; and,
- Changes to glazing specification.

Reconsultation

- None considered necessary.

Heads of Terms

The following are the agreed heads of terms to be included in the Section 106 legal agreement which would be required should planning permission be granted:

- Travel Plans for Major Event Days, Larger Scale Non-Major Event Days and Smaller Scale Non-Major Event Days including for staff and visitors;
- Contribution of £87,178 equal to the full CAVAT value for the loss of two street trees, such contribution to be used for replacement trees in the borough;
- Obligation using best endeavours for the demolition and potential replacement of the maintenance shed fronting Rugby Road within three years, subject to the grant of planning permission for a replacement facility the location of such replacement facility not to be proposed to be located within Metropolitan Open Land;
- Commitment to local training and employment initiatives;
- Provision of on-site signage promoting Twickenham Town Centre and website link from englandrugby.com to trytwickenham.com;
- Commitment to provide 56 Electric Vehicle Charging Points (14 active, 42 passive) at the wider Stadium site with a review mechanism for converting additional passive points to active points until such time as all points are active;
- Provision of a Community Liaison Officer by the RFU jointly reporting to the RFU and London Borough of Richmond upon Thames, including the additional payment of a bond in the amount of £24,000 to be drawn down upon by the Local Planning Authority for the purposes of appointing a new Community Liaison Officer in the circumstance that the Local Planning Authority determines the RFU's Community Liaison Officer has not fulfilled the duties of the role adequately;
- Contribution of a carbon offset payment in the amount of £76,932 in regard to the shortfall in carbon dioxide emissions the proposed development achieves against policy targets to the Council's Carbon Offset Fund;
- Restriction on the RFU supporting any Offsite Licensed Operators providing hospitality and/or any existing or future offsite hospitality locations for any Major Event at Twickenham Stadium, with an exception in the circumstance of England hosting any future Rugby World Cup;
- Commitment to provide photovoltaic panels on the South Stand (subject to any permissions required) to achieve the carbon reduction target for photovoltaic panels (35.76 tonnes) set out in the approved Energy Statement with provisions for reviewing and implementing other renewable energy sources if the identified reduction of 35.76 tonnes of carbon cannot be achieved by the photovoltaic panels including a commissioning test upon completion of installation
- Relocation of World Rugby Museum within Twickenham Stadium, new museum facility to be comparable to the existing facility and be reprovided no later than 3 years from the commencement of use of the East Stand Extension
- TMO contribution and costs associated with footway closure, temporary bus stop relocation and temporary pedestrian crossing relocation
- [Contribution in the amounts of £9,777.20 + VAT for removal of street trees and associated paving works].
- Requirement to enter into S278 for proposed emergency access

Professional Comments

Principal of Use

The National Planning Policy Framework (NPPF) paragraph 14 establishes the presumption in favour of sustainable development. Paragraphs 18 and 19 go on to confirm the government's commitment to securing economic growth and ensuring the planning system supports such sustainable economic growth.

London Plan Policy 4.5 *London's Visitor Infrastructure* supports London's visitor economy and seeks to stimulate its growth improving the range and quality of uses. Supporting text to the policy stresses the strategic importance of providing a world-class experience to visitors and that other locations such as outer London town centres and especially those identified in Policy 2.16 (which includes Richmond) with specialist strengths in leisure/tourism, should play an increasing role in provision for visitors in order to extend the benefits of tourism across the capital and reduce pressures on central London.

London Plan Policy 4.6 *Support for and Enhancement of Arts, Culture, Sport and Entertainment* sets out that London's diverse range of sporting and other cultural enterprises should be supported and that developments should: fulfil the sequential approach (and complete an impact assessment where necessary); be accessible by public transport; be inclusive and accessible to all; and address deficiencies in facilities and provide a cultural focus to foster more sustainable local communities.

London Plan Policy 3.19 *Sports Facilities* supports the enhancement of sports and recreation facilities while policies 2.6 *Outer London: vision and strategy* and 2.7 *Outer London: economy* support economic growth in outer London with strategic economic opportunities specifically recognised.

Policy CP 20 *Visitors and Tourism* sets out that the Council will support the sustainable growth of the tourism industry for the benefit of the local area by (as relevant) encouraging the enhancement of existing tourist attractions including sport stadia particularly that of the RFU; promoting sustainable transport; requiring facilities to be accessible to all; and enhancing the environment around attractions.

Twickenham Stadium is England's national rugby stadium and a major tourist draw for the area. Additionally it provides a venue for other major sporting events, such as National Football League (NFL), and for large-scale concerts. The proposed development seeks to improve the existing facilities to create a modern, world, class facility for its visitors. Policy at national, regional and local level supports such sustainable economic growth subject to a number of provisions including inclusivity, accessibility and promoting sustainable transport. These are explored in more detail in the detailed sections of the report following. The one element which would not have policy support is the potential loss of the World Rugby Museum (see section "Museum" below).

Design



View of proposed development from Rugby Road

Part 7 of the NPPF recognises the need for good quality inclusive design as a key aspect of sustainable development and LP Policies 7.1 *Lifetime Neighbourhoods*, 7.2 *An Inclusive Environment* and 7.3 *Designing Out Crime* are all consistent with the NPPF's approach. LP Policies 7.4 *Local Character*, 7.5 *Public Realm* and 7.6 *Architecture* seek to ensure that development respects the local character, promotes high quality public realm and that architecture makes a positive contribution. Policy 7.6 sets out design principles advising that buildings should be of high quality design including: optimising the potential of sites; promoting high quality inclusive design; not cause unacceptable harm to surrounding development; comprise materials and details which compliment local architectural character; be of proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm. London Plan Policy 7.7 *Location and design of tall and large buildings* sets out the criteria against which such buildings should be assessed including: relationship to surrounding buildings/environment/public realm; achieving high standards in architecture and materials and limiting effects and impacts (on matters relating primarily to amenity and views).

Policy CP 1 *Sustainable Development* seeks to maximise the use of new development through its co-location or dual use. CP 7 *Maintaining and Improving the Local Environment* states that proposals will have to illustrate that they connect positively with their surroundings to create safe and inclusive places through the use of good design principles including layout, form, scale, materials, natural surveillance and orientation, and sustainable construction. This is expanded upon by DM DC 1 *Design Quality* which states that new development must be of a high architectural and urban design quality based on sustainable design principles and be inclusive, respect local character and connect with, and contribute positively, to

its surroundings. Policy DM DC 3 *Taller Buildings* states that taller buildings will be generally inappropriate in all areas of the borough except the identified areas within Twickenham and Richmond. The *Design Quality SPD* provides additional guidance on matters of design.

Policy DM SD 5 *Living Roofs* states that living roofs should be incorporated into new developments where technically feasible and subject to considerations of visual impact (or to provide evidence and justification if a living roof cannot be incorporated) with an aim to use at least 70% of any potential roof plate area as a living roof. Supporting text to the policy provides for living/green walls, which is vegetation over a building's vertical surfaces, as an alternative if living roofs cannot be incorporated.

Policy DM OS 2 *Metropolitan Open Land* states that when considering developments on sites outside Metropolitan Open Land (MOL), any possible visual impacts on the character and openness of the MOL will be taken into account.

Design and Scale

The design of the proposed extension to the East Stand evolved throughout the pre-application stages. The height of the proposed extension is subservient to the existing stadium building while the extension respects the existing proportions of the stadium while extending out further.

The distinctive, flowing design is considered to be a major improvement on the utilitarian existing façade on Rugby Road. All views from the viewpoints provided (as requested by the Local Planning Authority) appear to be either improved or neutral.



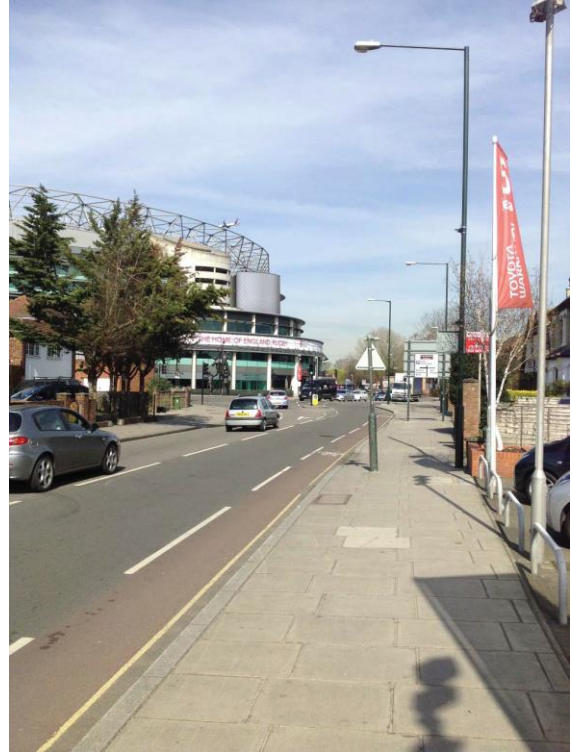
Existing view from Rugby Road looking south west



Proposed view from Rugby Road looking south west



Existing view from Whitton Road looking north



Proposed view from Whitton Road looking west north west

The brutalist and functional nature of the existing façade of the East Stand is proposed to be enclosed with a new modern façade comprised primarily of glazing and aluminium shingle rainscreen cladding at upper levels (level 3 and above) with a mix of porcelain rainscreen cladding and porcelain tiles at lower levels. Materials are considered acceptable, avoiding too brash an appearance at this scale. The main aluminium shingle rainscreen cladding has a slightly bronze finish which is considered will soften the appearance. A sample board was provided and it is recommended that a condition be included to ensure use of these materials.

In terms of details, fenestration benefits from noticeable reveals and design variations which are welcome. It is considered that the proposed design is such that it would have the potential to continue around the building towards the west. The introduction of a green wall (on the western return façade of the northern end of the development) facing into the Metropolitan Open Land and onto the Duke of Northumberland River is welcomed. Its relationship to this aspect is an improvement over the stark nature of the existing building.

Taller Building

In respect of DM DC 3, it is recognised that Twickenham Stadium is one of the very few sites outside of the borough's main centres, where there is an existing 'tall' building. The Council's borough-wide Sustainable Urban Development Study (2008) defines a 'tall' building as a building of 18 metres in height or higher. Whilst by definition the extension to the Stadium is classified as a 'tall' building, this needs to be assessed within the context of the existing structures and stadium complex and the surrounding area.

The proposed extension will not exceed the height of the existing stadium. While it will not be taller or significantly bulkier than the existing stadium it will be significantly taller than adjacent uses on Rugby Road and therefore falls to be considered by London Plan Policy 7.7.

As an extension to an existing tall building, its consideration is rather unique in the context of the policy as it is accepted it cannot be located elsewhere where tall buildings are deemed acceptable. It has been demonstrated that this scheme will not cause any material harm to the character and appearance of the area. In fact, it is considered that the proposal makes a positive contribution to the existing townscape, character and local distinctiveness of the area. In addition, the proposed scheme will deliver wider public benefits, including public realm benefits, visual benefits and improvements (in terms of visual impact by way of the green wall) to the nearby designated Metropolitan Open Land and the design will contribute more positively to the streetscape than the existing building. Bulk, scale and massing is considered acceptable in its context as an extension to the existing building. Its impacts in terms of overshadowing have been assessed and are acceptable. Matters of noise and reflected solar glare (see Solar Glare section) are proposed to be dealt with by condition. On this basis, while not consistent with policy, the proposals are acceptable on this matter.



Massing as seen from the south east



Massing as seen from the north

Boundary Treatment

Where the development adjoins the pavement the boundary is comprised primarily of fencing broken by gates and turnstiles. The fencing is 2.7m in height and comprises semi-opaque double mesh security fencing with signage above with a maximum overall height of approx. 3.2m. At present there are 45 turnstiles divided between two locations on this frontage whereas the proposal includes 43 turnstiles divided among three locations. Integral to the fencing is an LED display system which can be used to direct visitors to the correct turnstiles and assist with crowd management by, for example, identifying particular turnstiles as “No bag” or “Accessible” to facilitate more efficient entry. Details of fencing, gates and turnstiles are subject of a recommended condition.

Landscaping

The proposed landscaping is restricted to hard landscape given the nature of the development and the volume of people to be managed in these spaces during large events. The proposals generally widen the publically open area particularly at the southern end of the proposed development. Information provided by the applicant notes that the majority of customers seek the shortest route into the ground from their direction of travel and this would be the closest entrance for those arriving by train and walking from the station. As such widening the area to accommodate the potentially the greatest flows of visitors entering the stadium for major events should be beneficial, complemented by the crowd management measures at the gates described previously. The area of slab paving is increased to the new boundary line replacing the existing Tarmac which is positive.

Living Wall

A living wall comprising 112sqm forms a large proportion of the western return façade. The living wall is broken up by a series of louvres required for kitchen ventilation. The applicant has provided a living wall in place of a living roof which it stated was not suited to the proposed construction of the development and would have consequential impacts in terms of increasing the height, amount of façade and cost of construction. The applicant has provided evidence that a green roof is not technically feasible on the lightweight roof structure and a green wall instead. Policy DM SD 5 recognises that 'Living/green walls... may be an alternative if living roofs cannot be incorporated'. The provision of a green wall is a welcomed response to the policy objectives in the absence of a green roof and has additional visual benefits, particularly for views from the MOL and DNR.

Lighting

There is no additional external lighting to the façade of the proposed extension (though new lighting is proposed in the undercroft) or CCTV proposed by this application.

Inclusive Design

The facilities have been designed in consideration of the aspects of "Design for Maximum Access – Design guidelines for people with restricted mobility" and the following have been included in the proposals:

- Designated wheelchair access point in each new bank of turnstiles;
- 14 additional wheelchair viewing positions within the bowl, each with companion seats and access to accessible toilet facilities;
- Each new space is fully accessible by wheelchairs with step-free access;
- Accessible WCs provided to all new hospitality areas with sinks no higher than 865mm from the floor and grab bars beside toilets;
- Tables and counters are provided at a variety of heights;
- Entry doors to rooms are at least 815mm; and
- Avoidance of thick carpets, uneven floors and other floor surfaces that could pose slipping and tripping hazards.

Maintenance Shed

The maintenance shed which sits outside the application boundary but directly adjacent and in the foreground of the development when approached from the northwest along Rugby Road strikes a discordant note in the view from the north and would be much better removed. Best endeavours for the RFU to remove or replace (outside the MOL) the maintenance shed within three years forms an agreed Head of Term and will be included in the Section 106 legal agreement.



Contextual view of the Proposed Development with Maintenance Shed removed

Design Summary

The proposals comprise good quality, inclusive design optimising the potential of the site and improving the architecture of the building utilising high quality materials and a good level of detailing more properly activating the frontage to Rugby Road and defining the public realm. Subject to appropriate conditions the proposals generally accord with the policies and SPD noted above or where not compliant with policy in the case of DM DC 3, an assessment has concluded that the proposals are acceptable in the unique circumstances of this application.

Transport

The NPPF (paragraph 34) states that developments which generate significant amount of movements should be supported by a Transport Statement or Assessment. These should seek to maximise sustainable transport options, ensure the development is accessible to all and minimise transport impacts. It recognises that Travel Plans are a key tool to exploit opportunities for the use of public transport. This is supported by paragraph 29 which states that the transport system needs to be balanced in favour of sustainable transport modes.

London Plan Policy 6.3 *Assessing Effects of development on Transport Capacity* sets out that development that impacts (including cumulative impacts) on transport capacity and networks are fully assessed using Transport Assessments and development should not adversely affect safety on the transport network. London Plan Policy 6.3 also sets out the requirements for Construction Logistics plans and service and delivery plans for developments. 6.10 *Walking* seeks to ensure provision of high quality pedestrian environments. The Mayor's *Transport Strategy* sets out policies and proposals to achieve the goals set out in the London Plan.

Policy CP 5 promotes safe, sustainable and accessible transport modes including the use of Travel Plans and applications for major development being supported by a Transport

Assessment. Policy DM TP 2 reiterates the requirement for a Transport Assessment. Policy DM TP 1 *Matching Development to Transport Capacity* states that higher trip generating development will only be permitted in areas which are accessible by transport other than the private car. DM TP 3 *Enhancing Transport Links* states that all new developments must be designed to improve accessibility in conjunction with Policy DM TP 6 *Walking* and the Pedestrian Environment which seeks to protect, maintain and improve the pedestrian environment. DM TP 7 seeks provision of appropriate cycling facilities.

Policy DM TP 8 *Off Street Parking - Retention and New Provision* requires development proposals to demonstrate that the new scheme provides an appropriate level of off street parking to avoid an unacceptable impact on on-street parking conditions and local traffic conditions.

The application site has a PTAL rating of 1b. The development would be served by the car parking provided by the wider stadium site comprising 1,250 spaces in the North and West car parks. 106 cycle parking spaces are also provided by the wider site. As there is no increase in capacity of the stadium no additional car or cycle parking is proposed. TfL have requested further detail on cycle parking to accommodate additional staff (approximately 800 additional food and beverage staff are predicted) which has been provided and demonstrates sufficient cycle parking to support the development at this time, but a monitoring mechanism should be provided as part of the Travel Plan obligation to be secured within the required Section 106 legal agreement.

The site is located within Controlled Parking Zone (CPZ) R, which is active on any Twickenham Stadium Major Event Day with an expected crowd over 30,000 people. The standard time of restricted parking is between 10am – 6pm, although signs are displayed if this is altered.

A Transport Assessment has been submitted in accordance with NPPF, London Plan Policy 6.3, CP 5 and DM TP 2. It identifies that peak arrival time for hospitality guests is approximately 3.5h prior to the match starting. In the circumstance where the offsite hospitality sites no longer continue to operate alongside the development the consolidation of the hospitality offer in the east stand is forecast to reduce the number of person and vehicle trips in the area as the corporate hospitality guests travel directly to the stadium in advance of the peak time for General Admission spectators, staff, servicing and waste removal trips to the off-site hospitality sites would come off the network but to an extent be replaced at the stadium. Where the offsite locations do continue there is likely to still be benefit as there is still likely to be a reduced number of guests arriving in the peak-time as the attendees at the offsite locations would otherwise have been General Admission guests in any case. While there would be no change in numbers of people coming to the stadium (other than staff arriving outside of peak guest arrival and departure times) the flow to and from the stadium may be dispersed over a greater period of time.

The Transport Assessment also confirms that the existing shuttle bus service and coach parking required during Major Events would continue to be operated and remain unchanged during construction works. This is confirmed by the Construction Logistics Plan.

In regard to the proposed conference and banqueting use of the development, the applicant tested a scenario where a 900 guest conference occurred in the South Stand simultaneously to a 300 guest conference in the East Stand. Conference sizes were agreed with the Local Planning Authority based on historic evidence of conference provided by the applicant. It has been demonstrated that such a use results in an uplift of between 38 and 52 vehicles in the morning peak (90% of events of this size finished outside the PM peak) and that there was sufficient car parking capacity within the wider site to accommodate these vehicles in accordance with DM TP 8. The Council's Transport Officer has reviewed the assessment

and raised no issue in this regard subject to the submission of Travel Plans for two types of non-major events, the smaller scale event of under 3000 people and the larger scale non-major event of over 3000.

Servicing and Waste

Delivery, servicing and waste access to the stadium is provided via Gate D on Rugby Road just north of the proposed development. Deliveries follow a circular route within the stadium site as existing. However, with the proposed projection of the East Stand the route now lies within the footprint of the East Stand and vehicles will travel within the double-height concourse space. The development has been planned such that two articulated lorries of up to 16m in length and 2.5m wide can pass side by side at the proposed East Stand. Vehicles will park on the internal servicing road and unload goods into the proposed service lift at the north east corner of the stadium and general lifts will also be used for the transfer of goods through the stadium. Vehicles will park to one side of the internal road to allow other vehicles to pass.

The proposals result in an uplift in deliveries to the stadium for Major Event days representing an additional seven articulated lorries and three other servicing vehicles (total deliveries increase from 40 vehicles to 50 vehicles), distributed over the five days preceding the event. There is no proposed uplift for Non-Major Event days. The Transport Assessment includes an outline of Delivery Service Plan measures. A Delivery Service Plan is required by recommended condition.

New waste and recycling storage provision is provided on ground floor level adjacent to lift 5 to accommodate for the 19% (14,778l) increase (based on a bespoke calculation) in waste for the East Stand on a major event day associated with the proposals and will be transported to the external waste store in the north west corner of the stadium before being emptied into a skip ready for collection. The proposals make provision for the internal storage of waste to the estimated calculated requirements for this type of development and the access arrangements are acceptable in accordance with the *Refuse and Recycling Requirements SPD*.

Construction Logistics Plan (CLP)

A CLP has been provided which has an indicative programme of works commencing in March 2017 and completing in June 2018. TfL have made a number of comments on this document which the applicant has included in an updated revision to the document. On match days it is proposed that a 2m wide part of the footpath on Rugby Road would be reopened for pedestrian access and the shuttle bus and coach parking facilities would operate as normal. There would be no construction works permitted on Major Event Days (as per a recommended condition). The CLP is not proposed to be an approved document but a CLP is required by recommended condition.

Travel Plans

A Major Event Day and Non-Major Event Day Travel Plans have been provided in accordance with the NPPF and CP 5. Additional work will be required to make Travel Plans acceptable and this will be secured by the Section 106 legal agreement and is included within the Heads of Terms.

With the development in place impacts on the transport network are predicted to be limited on Major Event days as there is no increase in stadium capacity nor car parking (all onsite car parking is pre-booked) though there will be an increase in on-site staff. On Non-Major Event days such as conferences again the impact is predicted to be limited based on the scenarios tested. Officers agree that subject to conditions and a requirement to secure effective and appropriate Travel Plans, the transport impacts of the proposed development will be acceptable.

Energy and Sustainability

Paragraph 93 of the NPPF states: “*Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.*”

London Plan Policy 7.6 *Architecture* notes that buildings should incorporate best practice in resource management and climate change mitigation and adaptation. London Plan Policy 5.2 *Minimising Carbon Dioxide Emissions* states that proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the Mayor’s hierarchy: (i) Be Lean (use less energy); (ii) Be Clean (supply energy differently); and (iii) Be Green (use renewable energy). The Mayor’s *Sustainable Design and Construction* SPG states that a 35% reduction in carbon dioxide emissions (in relation to Part L Building Regulations 2013) needs to be achieved. Policy 5.2 further states that carbon dioxide reduction targets should be met on-site or where clearly demonstrated this is not possible the shortfall may be provided off-site or through a cash-in-lieu contribution to secure savings elsewhere.

London Plan Policy 5.3 *Sustainable Design and Construction* sets out that major development should meet the minimum standards outlined in supplementary planning guidance including sustainability principles. London Plan Policy 5.6 *Decentralised Energy in Development Proposals* sets out the energy hierarchy prioritising connection to existing networks or futureproofing for future connection. London Plan Policy 5.7 *Renewable Energy* seeks a reduction in carbon dioxide emissions through the use of onsite renewable energy generation. London Plan Policy 5.9 *Overheating and Cooling* provides the cooling hierarchy with active cooling systems being the least preferred option. London Plan Policy 5.10 *Urban Greening* and Policy 5.11 *Green Roofs and Development Site Environs* promote green infrastructure (including green roofs and walls) in major developments to contribute to urban greening.

Policies CP 1 and DM SD 1 *Sustainable Construction* set out that development will be required to conform to the Sustainable Construction checklist, including the requirement to meet BREEAM "excellent" (for non-residential development). Policy DM SD 9 *Protecting Water Resources* and Infrastructure specifies meeting a minimum of 2 credits on water consumption and consider utilising rainwater harvesting wherever possible.

Policies CP2 and DM SD 2 *Renewable Energy and Decentralised Energy Networks* set out that the council will seek to reduce its carbon dioxide emissions (DM SD 1 also sets out carbon emission reduction targets which have been superseded by London Plan 2016 targets); require the evaluation, development and use of decentralised energy in development. CP 2 seeks an increase in 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 by promoting its use in existing development. This is supported by DM SD 2 which seeks to maximise micro-generation of renewable energy. DM SD 2 further requires provision to be made for future connection to a local energy network should one become available. DM SD 3 *Retrofitting* supports high standards of energy and water efficiency through retrofitting and encourages proposals for conversions and extensions to comply with the Sustainable Construction Checklist.

Policy DM SD 4 *Adapting to Higher Temperatures and Need for Cooling* states that all new development proposals should reduce reliance on air conditioning systems and demonstrate this in accordance with the cooling hierarchy.

CP 1 also states that environmental gain will be sought to compensate for any environmental cost of development.

Carbon Dioxide Emissions

Policies CP2, DM SD 1 and London Plan Policy 5.2 state that developments must achieve a 35% reduction in CO2 emissions on-site beyond Building Regulations 2013. The revised Energy Statement (dated September 2016) states that the total reductions in regulated carbon emissions for the stadium amount to 23.01% over baseline emissions rates. This is below the 35% target. It is disappointing that, given the large scale nature of the scheme, the RFU is unable to achieve the policy standard of a 35% reduction in CO2 emissions on site. However, the Council has approved a Carbon Offsetting Fund so the remaining CO2 (c. 10%) may be offset by a cash in lieu contribution to the Council's Offsetting fund. The Council has adopted the London Plan price of carbon of £60 per tonne over 30 years. The applicant has put forward a case that the Stadium is only used to full capacity on major event days (approximately 52 per year) and is largely unoccupied for the remainder of the time. They have therefore calculated a pro-rata CO2 usage per day based on major event days and associated set up/tear down days to be applied in the calculation of any carbon offset payment. Discounts for offsetting are not given in this Local Authority area on this basis and as such the applicant will be required to make the full carbon offset payment of £76,932.

Energy Hierarchy

The Energy Statement demonstrates how the mayor's Energy Hierarchy has been followed.

- Be Lean: achieved by use of various techniques including thermal efficiency, low energy lighting and efficient boilers. Details of the proposed specification have been given. A 5.92% reduction has been reported for the new build area.
- Be Clean: In terms of decentralised energy the report states is no existing or proposed district heat network to connect to. The applicant has investigated the Mogden Sewage Works Heat Network and provided evidence that connection is not feasible at this time. This has been confirmed by Thames Water as operators of Modgen Sewage Works. The proposals have been designed to allow for future connection points and a site plan showing the location of the plant rooms and energy centres have been provided which also proposes a connection route. Combined Heat and Power (CHP) has been proposed. Details of the proposed system have been given, however this is to be confirmed at a later date and a pre-commencement condition is recommended to control this. The report states this has been sized to meet baseline demand including the hotel and gym in the South Stand. There has previously been some discussion about the acceptability of this arrangement and it has been agreed that the only way CHP on the site will be practicable and feasible is for its use to be beyond the East Stand development, and this is accepted. The reported savings include savings to the South Stand as well as the East Stand. A total 10.16% reduction in emissions has been made within the East Stand, where as a 14.35% reduction has been made when Stadium wide savings are taken into account. The total is applied against the policy targets as the South Stand savings would not be realised unless the proposed development comes forward.
- Be Green: PV panels have been recommended for the South Stand, although not technically part of the proposed development it again is considered that electricity generation and emissions reductions as a result of panels installed here can be counted. The electricity generated will be used across the whole site. A 79kWp system has been proposed and a roof plan has been provided for this. The panels will be mounted onto a flat section of the South Stand roof with A-frames so they are at an angle, the applicant has confirmed this will be 30-40 degrees. A section was previously provided showing 4 rows of panels. These appear to be in pairs with a larger gap in the middle, it is not clear from the plans provided if the front panel of

each pair will shade the rear panel due to them being located closely together. Following the applicants comments we will recommend a pre-commencement condition to resolve this. It should be noted that the photovoltaic panels may themselves be subject to the requirement for planning permission, such application needing to be determined on its own merits and assessed against the relevant policies of the Local Planning Authority. The report states that a 79kWp system will be able to reduce emission by 35.76 tonnes. A total 11.97% reduction has been made at this stage when PV is allocated based on floor area. When all the new PV is taken into account a 23.01% reduction has been achieved.

Overheating and Cooling

Results of overheating analysis have been provided in the energy strategy. The analysis has been done in accordance with TM52 and TM49 weather files have been used, therefore complying with the London Plan. Through passive design measures such as insulation, air tightness, thermal mass and energy efficient lighting and by utilising outside air and cooling coils to ventilate and cool spaces the risk of overheating is reduced to the required levels.

Policy DM SD 4 states that all new development proposals should reduce reliance on air conditioning systems in line with the cooling hierarchy. The report give details of how the cooling hierarchy has been followed and it appears that active cooling is required. Area weighted average building cooling demand (MJ/m²) have been provided for the notional and actual building in a table as required by the London Plan. The design of the building does not allow for natural or passive ventilation so cooling coils are required. This is the least favoured option in the Cooling Hierarchy, however explanation has been provided so this is accepted.

BREEAM

The applicant has confirmed that 2 separate assessments are being proposed under BREEAM New Construction and BREEAM Refurbishment and Fit-Out. The 2 pre-assessments provided show BREEAM Very Good will be achieved. The policies require BREEAM Excellent. The revised report shows the new build element will achieve BREEAM Very Good with a score of 60.5% and all mandatory BREEAM Excellent credits. The refurbished element will achieve BREEAM Very Good with a score of 65.07%, mandatory credits do not appear to be mentioned however the applicant has confirmed that these will be achieved. All credits not awarded under the BREEAM assessments have been explained. Although the application falls short of meeting the policy requirement for BREEAM Excellent, the applicant has provided detail explaining why BREEAM Excellent is not feasible for this site. Conditions are recommended to ensure BREEAM targets are achieved.

Sustainable Construction Checklist (SCC)

The applicant has submitted a completed checklist. The checklist appears to be completed correctly. The development achieves a score of 37 resulting in a C rating. Such a score is classified as 'minimal effort to increase sustainability beyond general compliance'.

Energy and Sustainability Summary

Though the development fails to satisfy a number of policy targets in respect of reduction of carbon emissions (*Sustainable Design and Construction SPG*, DM SD 1), reduction of carbon emissions by renewables (CP2) and BREEAM (CP 1, DM SD 1) explanation has been provided and in respect of overall reduction of carbon emissions a Head of Term has been agreed for a contribution to be made to a carbon offsetting fund (calculated based upon the shortfall against the policy target) in accordance with London Plan Policy 5.2. The applicant has made some effort in respect of the addition of a living wall and the inclusion of Electric Vehicle Charging Points (to be secured by legal agreement) within the wider stadium site, as well as exploring the potential connection to Mogden Sewage Works in accordance

with London Plan Policy 5.6 and DM SD 2. Therefore, on balance, in regard to matters of energy and sustainability, the proposals are considered acceptable.

Daylight, Sunlight and Overshadowing

Policy DM DC 5 Neighbourliness, Sunlighting and Daylighting seeks to ensure that the design and layout of buildings enables sufficient sunlight and daylight penetrates into buildings and seeks to protect adjoining properties from overshadowing in accordance with established standards. The supporting text to the policy references compliance with specified BRE guidelines.

The applicant has submitted a Daylight, Sunlight, Overshadowing & Solar Glare Report which assesses the relevant properties (primarily located on Varsity Drive and Butterfield Close) agreed between the applicant and the Local Planning Authority during pre-application discussions. BRE, on behalf of the Local Planning Authority, assessed the Report and concluded that loss of daylight and sunlight would be within the BRE guidelines for all the nearby dwellings, and is assessed as negligible. Loss of sunlight to gardens would also be within the BRE guidelines, and assessed as negligible. On this basis, the proposals accord with DM DC 5 in respect of matters of daylight, sunlight and overshadowing.

Solar Glare London Plan Policy 7.7 *Location and Design of Tall and Large Buildings* states that tall buildings should not affect their surroundings adversely in terms of (amongst other items) reflected glare. Policy CP 7 *Maintaining and Improving the Local Environment* states that proposals will need to illustrate that they connect positively with their surroundings to create safe and inclusive places.

The Daylight, Sunlight, Overshadowing and Solar Glare Report submitted by applicant concludes that the effects of solar glare are considered to be of minor adverse significance, with motorists travelling along Rugby Road towards the stadium only experiencing glare caused by the proposed development for a matter of seconds at any one time.

The report has been reviewed by the British Research Establishment (BRE) as specialist consultants on behalf of the Local Planning Authority. BRE considered that in regard to disability glare, the main concern is for motorists travelling south down Rugby Road itself (Viewpoints 2, 4 and 5 of the applicant's report) as motorists will be travelling directly towards the building. There is particular concern about viewpoints 4 and 5 which are closer to the building. Sunlight can be reflected at a range of times and months of the year, and is less likely to be intercepted by trees. In some cases this is within 10 degrees of the driver's line of sight which indicates a significant risk of disability glare. Disability glare happens when a bright source of light impairs the vision of other objects and can affect motorists' ability to drive safely. The applicant's report states that instances of solar glare would be transient, lasting only a few seconds for the motorist, however, BRE advises that at 30 miles per hour, in 3-4 seconds a car would travel 40-50 metres, giving plenty of scope for an accident to occur.

A Senior Engineer for the Council noted that observed vehicle speeds are often in excess of 30mph on Rugby Road, the road carries a large number of HGVs and also has a single controlled crossing point outside of William Web Ellis House. The engineer concluded that a driver being blinded for several seconds by sunlight is an unacceptable risk in this location. The Engineer further noted that there are well used mandatory at any time cycle lanes on both sides of the road, a section of which is on a bend. Therefore the likelihood and severity scores when risk assessed at Stage 1 and 2 Safety Audits would be increased in the event of solar glare.

Concerns were also expressed by the Council's Principal Transport Officer in regard to glare. The officer was concerned, looking at the viewpoint V2 of the applicant's report when

coming off the roundabout, due to the two bus stops as drivers may try to overtake a stationary bus and the solar glare may blind the driver to vehicles coming the other way or even another bus. The officer was also concerned about viewpoint V5 (where the driver is going to come off the bend) as Rugby Road frequently has traffic backed up past the East Stand so drivers could be coming off the bend blind to stationary traffic.

The severity of glare also depends on the type of glazing and its reflectance. The applicant has done further work on this aspect through the course of the application. The application now specifies an anti-reflective glazing for the outer pane and that the overall reflectance of the whole glazing configuration would be 6.5% at normal incidence. While the applicant has taken measures to reduce the reflection from the glass to below that from normal double glazing, BRE is unable to confirm whether the building would actually dazzle motorists in practice with such mitigation in place.

Further discussions resulted in the applicant proposing amendments including additional mitigation as follows:

- The reflectivity of the glass where the glare occurs (about 7 bays) being reduced to about 5%, from the 7% as was proposed noting this would not affect the overall performance of the façade (for lighting, energy, etc) if slightly higher reflectivity glass was used elsewhere on the façade where there is no issue with reflectivity;
- A condition/obligation for a Stage 2 Safety Audit to be undertaken once the façade is installed to assess whether the residual glare is then, in fact, a problem or not for oncoming drivers. (The applicant anticipates that it would not be as the level of reflectivity proposed would now mean that 95% of the light from the sun would not be reflected);
- In the circumstance where the Safety Audit identifies a residual problem, film or similar mutually-agreed mitigation measures would then be installed to further reduce any remaining glare. The applicant has suggested these could be integrated with an attractive graphic, such as a rose, so that it did not appear as an add-on. Any film applied to the external surface may be subject to planning permission.

The BRE have again reviewed this proposed approach and consider it a sensible approach but note that the timing of the safety audit needs to be addressed with care - needing to wait for those times of year when glare is predicted to occur, but not leaving it too long in order to avoid too much risk to the public.

The Council's Principal Transport Officer has confirmed such an approach is acceptable subject to a robust condition on timing of occupation of the building and when safety audits and remediation need to be done. The Officer also considered that the development should be shrouded during construction with further consideration given to when such covering should be removed. The Officer notes that careful consideration of timing needs to be made between the glazing being unveiled, the safety audit(s) and the remediation if needed being put in place so that the risk for accidents is minimised. These considerations form recommended conditions.

On the basis of the advice received and subject to recommended conditions, the proposals could be made to comply with this aspect of London Plan Policy 7.7 as CP 7.

Noise

Paragraph 123 of the NPPF states that planning decisions should aim to avoid noise giving rise to significant adverse impacts and to reduce and minimise other adverse impacts including by use of planning conditions.

London Plan Policy 7.15 *Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes* sets out that development should seek to manage noise using a variety of strategies including avoiding and mitigating adverse noise impacts. Policy CP 1 states that *“Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.”*

A Planning Noise Report provides an assessment of the potential noise impacts of the development against a long term baseline noise survey undertaken in March 2016. Two Match Day surveys were also undertaken in February and March 2016 at offsite hospitality locations.

Relevant Noise Impact Assessment Positions were established for properties on Varsity Drive and Butterfield Close, being the closest noise sensitive receptors. These were assessed on the basis of a number of noise sources: traffic (for match days and conference events of up to 300 guests); patron noise; breakout (from the stadium bowl); and, breakout from internal areas (with no significant amplified music). All impacts were predicted to be negligible with the solid façade resulting in beneficial containment of noise in some cases. Negligible is defined as a sound change level of 0.0-0.9dB for short term impacts and 0.0-2.9dB for long term impacts.

In respect of the offsite hospitality locations, if their use does end as a result of the end of their relationship with the RFU, the impact on residents located in the vicinity will reduce.

The report also considers plant noise, identifies plant zones and proposed plant and establishes plant noise limits. Conditions are recommended to control potential noise and vibration impacts, including any mitigation measures required, arising from plant.

Given that the nature of the proposed development introduces a beneficial acoustic measure (sealed façade) and a detailed assessment of impacts has been provided, it is anticipated that the development will have a negligible acoustic impact during operation. This is also on the basis that stadium capacity remains unchanged. Subject to the recommended conditions being included (including any mitigation required), it has been demonstrated that the proposed development will not give rise to any significant adverse impact in respect of noise in accordance with London Plan Policy 7.5 and CP 1.

Air Quality

London Plan Policy 7.14 *Improving Air Quality* sets out that development proposals should minimise increased exposure to poor air quality and seek to improve it being at least air quality neutral through sustainable design and construction and ensuring any provision required to improve emissions is provided onsite. The Mayor’s *“The control of dust and emissions during construction and demolition”* SPG provides additional guidance. Policy CP 1 states that *“Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.”*

An Air Quality Assessment (AQA) has been submitted which considers the impacts of the proposed development would have on air quality. The site lies within an Air Quality Management Area (AQMA).

Construction Phase Impacts have been assessed for two zones: the East Stand construction zone and the contractor’s compound zone. There are four broad categories which have been assessed: demolition, earthworks, construction and trackout. Not all activities are relevant to both zones (e.g. there is no site access in the East Stand construction zone and therefore trackout is not applicable). For the East Stand construction zone the greatest risk from dust soiling and Particulate Matter with a mean aerodynamic diameter of less than 10 microns (PM10) effects is during construction where the risk is ‘medium’, during demolition and

earthworks the risk is 'low.' In respect of the contractors' compound zone there is a low risk of dust soiling, PM10 effects and ecological impacts (on the DNR) from earthworks and trackout. All risk levels referenced above are without mitigation.

The Operation Phase is not expected to have significant impacts on air quality because;

- The capacity of the stadium will not increase on match days and no additional car parking will be provided;
- The creation of vehicle trips associated with conferences was sensitivity tested based on modal split and potential impacts were shown to be below IAQM criteria; and
- CHP including an emissions control scheme will (subject to a recommended condition) comply with emission limits.

Best practice mitigation measures are identified in IAQM Guidance and the Mayor of London's SPG on the *Control of dust and emissions during construction and demolition*. The AQA identifies 24 mitigation measures for a medium risk site.

Given the type of potential air quality impacts identified it is considered that these can be minimised by recommended conditions such that the development will accord with London Plan Policy 7.14, CP 1 and the *Control of dust and emissions during construction and demolition* SPG .

Odour

Policy CP 1 states that "*Local environmental impacts of development with respect to factors such as noise, air quality and contamination should be minimised.*"

The provision of additional corporate and debenture hospitality space is supported by a number of kitchens which range from being similar to a high-end steak restaurant to providing an offer similar to a smokehouse and pizzeria to hot tapas. In order to ensure no unacceptable impacts arise from associated kitchen odours a Kitchen Odour Risk Assessment has been undertaken by the applicant in accordance with Defra guidance on *Control of Odour and Noise from Commercial Kitchen Exhaust Systems*.

The risk assessment for odour is divided into four parts:

- Dispersion: Poor (discharge not low level, but below eaves, or discharge rate below 10 m/s) to Moderate (discharging 1m above eaves at a rate of 10-15 m/s)
- Proximity to receptors: Medium – there are residential properties located within 100m (nearest approximately 40m)
- Size of kitchen: Large – more than 100 covers or a large-sized take away
- Cooking type and grease loading: Low – most pubs, Italian, French, pizza or steakhouse

Based on the total rating a high level of odour abatement is required for each kitchen.

The following odour abatement systems are recommended by the Assessment and required by recommended condition:

Abatement Stage	System
Particle Filtration	Fine filtration system to protect odour removal system
Odour Removal	Carbon Filtration/UV Ozone
Emissions Discharge	High level discharge

Subject to the recommended condition the impacts of the development in regard to kitchen odour will be minimised in accordance with CP 1.

Town Centre Impacts

The NPPF seeks the application of a sequential test for applications for main town centre uses not in a town centre or allocated in an up-to-date Local Plan and including an assessment of impact in specified circumstances (paragraphs 24 and 26). London Plan Policy 4.7 *Retail and Town Centre Development* adopts a similar approach as does Policy CP 8 *Town and Local Centres* which also identifies Twickenham and Whitton as District Centres.

The applicant has provided an assessment of the impact of the proposals on nearby town centres as well as applied the sequential test for the proposed conference and hospitality use of the site.

Sequential Test

The applicant states that the corporate hospitality facilities need to be located in close proximity to the stadium bowl in order to provide a world-class hospitality experience and that the distance and travel times associated with the existing offsite locations are a significant defect of the existing arrangement. Addressing such deficiencies is supported by London Plan Policy 4.7 as noted earlier in this report.

The applicant also contends that hospitality facilities are not considered main town centre uses as defined by the NPPF, however has undertaken an assessment given concerns about the potential impacts of the proposals on the borough's town centres and Class A3/A4 uses in particular. The applicant accepts that the conferencing use would comprise a main town centre use.

The applicant undertook a sequential test including an assessment of specific sites identified by the Local Planning Authority. The applicant has also cited the decision of the Supreme Court in the *Tesco Stores Limited v Dundee City Council* ([2012] UKSC 13) in which Lord Hope stated at paragraph 37 of the Judgement that *"it is the proposal for which the developer seeks permission that has to be considered when the question is asked whether no suitable site is available within or on the edge of the town centre."*

In assessing potentially sequential sites none were identified that were either suitable or available for the development proposed. On the basis of the assessment provided, officers are satisfied that the sequential test has been satisfied.

Impact

With regard to impact, the applicant considered three scenarios as agreed in pre-application discussions:

1. *Potential impact arising from conferencing and banqueting on Non-Major Event days.*
A list of existing local conference and banqueting facilities was provided which identified that only two (Isleworth Public Hall and the Twickenham Community Building) are within a designated town centre with the majority being in out of centre locations. The applicant considers that the proposed development is unlikely to lead to a substantial trade diversion from existing conference facilities as: very substantial surplus capacity already exists for conferences within the South Stand as existing facilities are underused; existing facilities are very much smaller than the capacity of the stadium and are likely to offer a different product; and the layout of the proposed facilities within the East Stand are designed for corporate hospitality which increasingly favours fixed features and less flexible space. In the case of the two facilities located within a town centre the assessment concludes that even if some diversion were to occur, such impact would not be sufficient to lead to significant adverse effect on overall town centre vitality and viability. Officers are satisfied on this point.
2. *Potential impact arising from the East Stand development leading to additional provision of offsite (non-RFU licensed) corporate hospitality space (i.e. assuming*

existing OLO sites continue to provide corporate hospitality as at present and that East Stand's offer would be a net increase) on Major Event days.

The assessment contends that corporate hospitality facilities are only open to those who have pre-arranged and purchased tickets to attend unlike general Class A3/A4 uses. It is suggested that corporate hospitality packages offer less flexibility and are more structured (reception meal, pre- or post-match discussion and commentary possibly followed by a supper) and cost more. The facilities are not designed for – and nor are they accessible to – those attending matches on General Admission tickets who may choose to use the facilities within the town centre. The applicant refers to the Council's 2014 Retail Study which identifies unmet need for additional Class A3/A4 floorspace within Twickenham town centre which additional corporate hospitality space is unlikely to impact upon given its limited usage in conjunction with Major Events at the stadium. It is also suggested that town centre turnover on RFU match days is restricted by physical capacity rather than by demand. The assessment includes a calculation of approximate physical capacity of A3 and A4 uses in Twickenham town centre based on Fire Regulations floorspace factors and making an additional 35% allowance for outdoor space which suggests a physical capacity of approximately 15,000 people. The ability of the offsite locations to continue to operate should also be considered. For example, the site at Richmond upon Thames College is a temporary permission for 5 years from 2015, but the site now benefits from outline planning permission (ref 15/3038/OUT) and Reserved Matters (ref. 16/3293/RES) for which enabling works have commenced onsite. The Access Self Storage permission, granted by LB Hounslow, is also a temporary permission expiring in 2017.

3. *Potential impact arising from the East Stand development effectively releasing additional Class A3/A4 restaurant/bar space on Major Event days (i.e. assuming that the existing OLO sites switch from providing corporate hospitality to providing more open-access type facilities, providing an alternative location for people who may otherwise be in the town centre at pubs, restaurants etc.).*

The RFU considers the likelihood of this occurring is relatively low as such open access/non-ticketed facilities could potentially already be provided on open land around the stadium but in practice does not occur except within the curtilage of public houses and restaurants indicating little demand for such facilities and that some of the existing offsite permissions relate only to corporate hospitality as opposed to general hospitality functions. They have undertaken an exercise which demonstrates that projected impacts in this scenario would equate to less than half of the amount that the Council's 2014 Town Centre Study projects that expenditure is likely to exceed turnover in Twickenham alone leaving expenditure capacity to support floorspace growth. The 7 matches could amount to £770,000 of spending. In overall terms, Twickenham's 2017 turnover is estimated, by the 2014 report, as £162m. Trade draw of £770,000, should this occur, would represent less than 0.5% of overall turnover which is not significantly adverse, taking account also of the context of the overall capacity for additional floorspace. It should also be noted that the Local Planning Authority would need to consider whether such use of the existing sites would require planning permission.

The assessment concludes that the proposals will have "little or no effect on the town centres" primarily because the proposals relocate corporate hospitality rather than increasing provision. Match tickets will not be supplied by RFU to existing Offsite Licensed Operators (OLOs) should they continue to offer hospitality (to be secured by legal obligation). The RFU considers that it is unlikely that OLOs will continue to provide hospitality without its support and associated provision of match tickets because of high setup costs and they would be unlicensed by the RFU.

It is considered that the proposal will not lead to a material increase in entertainment and refreshment facilities available to General Admission ticket holders, and it is unlikely that the proposed East Stand would adversely affect the prospects of allocated sites coming forward for development.

It is accepted that the current arrangements for offsite hospitality detract from the experience. Improving the visual amenity of stadium and reducing visual sprawl and disturbance and traffic generation arising from existing temporary facilities should they cease to operate without the support of the RFU would be a benefit. Given that the hospitality ends up to 90 minutes after the match (also included as a recommended condition) thus allowing the opportunity to visit the town centre afterwards if desired is welcomed. It is also acknowledged that hospitality is offered to only a relatively small proportion of match-goers.

Subject to conditions restricting access to and operation times of the proposed corporate and debenture hospitality facilities and obligations to be secured through a Section 106 legal agreement for provision of signage/promotion of local town centres to stadium visitors officers, officers are satisfied that there would not be significant adverse impact caused to nearby town centres as a result of these proposals nor would there be any significant adverse impact on allocated sites in accordance with the NPPF, London Plan Policy 4.7 and CP 8.

Flood Risk

In accordance with the NPPF (paragraph 99), new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. London Plan Policy 5.12 Flood Risk Management requires proposals to comply with requirements of the NPPF and associated technical guidance.

Policy DM SD 6 Flood Risk sets out the Council's requirements for flood risk including the provision of a Flood Risk Assessment as required and appropriate development and the sequential test in respect of flood risk.

The Flood Risk Assessment submitted with the application identifies that the proposed development is located within NPPF Flood Zone 2 (medium probability between 1 in 100 and 1 in 1000 annual probability of river flooding or between 1 in 200 and 1 in 1000 annual probability of sea flooding in any year) and is considered "Less Vulnerable" according to the NPPF. As the development is an extension to the existing stadium all of which lies within Flood Zone 2, it determines that consideration of other locations is not practical and alternative sites at lower flood risk are not available (as to extend to any side would be within Flood Zone 2). Therefore the proposals are considered to be acceptable within Flood Zone 2. On this basis further application of the Sequential Test or Exception Test is not required.

The proposed development is not considered to impact upon the fluvial flood risk to the site or elsewhere nor are anticipated flood depths (0.1m – 0.3m) considered to give rise to significant hazard to users of the proposed development. Flood risk from public sewers, pluvial, ground water and reservoirs have been considered and regarded as low.

Through future climate change, the site is predicted to become located within Flood Zone 3a but the nature of the development will not create a significant loss of floodplain storage nor are anticipated flood depths anticipated to be significant.

The proposals are considered to satisfactorily address the relevant policies in respect of flood risk.

Drainage

Policy CP 3 Climate Change – Adapting to the Effects states that development will need to be designed to take account of the impacts of climate change over its lifetime, including for (amongst other matters) water conservation and drainage.

Policy DM SD 7 Sustainable Drainage sets out the drainage hierarchy for developments to follow stating any discharge should be reduced to greenfield run-off rates wherever feasible and including a requirement for evidence that capacity exists in the public sewerage network to serve their development where water is being discharged to a public sewer.

Policy DM SD 10 Water and Sewerage Provision notes that new development will need to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve the development including provision of such evidence.

The existing site is comprised entirely of hardstanding and therefore the proposed development will not lead to an increase in impermeable area. The proposed surface water drainage strategy is to maintain the existing regime with limited alterations (to divert around foundations etc.), ensuring that all of the surface water run-off from the roof (albeit rainwater is intercepted at a higher level the impact on drainage will not be significant) will be discharged to the site's existing private surface water network which takes the majority of flows from the development footprint to the north discharging into an underground water tank (approximately 218m³) located to the north of the stadium with a small area also draining to an attenuation feature to the south of the stadium.

In respect of adapting to climate change the Council's Highway Asset Co-ordinator requested the applicant provide the 1:100 year flood and 1:100 year flood plus 30% climate change events which demonstrated that although micro drainage runs indicate flood risk, the stated water levels would not cause flooding in Rugby Road or the neighbouring properties. On this basis the officer was satisfied that this was acceptable.

As there is relatively no change to level of run-off and it continues to be discharged to the private surface water network, and the applicant has provided additional material to satisfy requirements in respect of adaptation to climate change, the proposals are considered to comply with the relevant policies.

Ecology

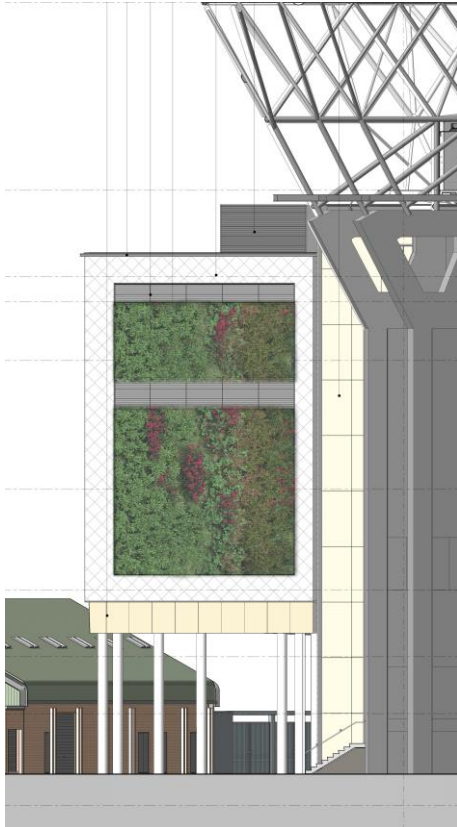
In determining planning applications paragraph 118 of the NPPF directs local planning authorities to aim to enhance and conserve biodiversity including encouraging opportunities to improve biodiversity. London Plan Policy 7.19 *Biodiversity and Access to Nature* seeks for developments to make a positive contribution to the protection, enhancement, creation and management of biodiversity. Policy CP 4 encourages biodiversity enhancements.

Policy DM OS 5 Biodiversity and new development requires all developments to enhance existing and incorporate new biodiversity features and habitats into the design of buildings themselves as well as in appropriate design and landscaping schemes of new developments.

An Ecological Assessment was submitted in support of the application and it identified that the development site has no ecological value. It acknowledged that the Duke of Northumberland River's Sites of Importance for Nature Conservation (SINC) lies immediately to the west of the northern car park of the wider stadium site and is proposed to be used during the construction period of the development for compounds and temporary parking. It notes that protection measures will be required and these are included in the recommended conditions. While not noted in the Ecological Assessment, evidence of the presence of water voles, a protected species, has been identified along the DNR next to the stadium site. A condition will be used to secure ecological enhancement measures including the provision

of a minimum of three house sparrow terrace boxes as previously discussed with the applicants and recommended by the Ecological Assessment.

A green wall has also been included in the proposals as described above. It is considered that in securing the green wall and ecological enhancement measures and protecting the existing ecological features which may be impacted during construction of the proposed development the proposals comply with the objectives of LP 7.19, CP 4 and DM OS 5.



West elevation illustrating green wall

Trees

London Plan Policy 7.21 *Trees and Woodland* states that existing trees of value should be retained and any loss as a result of development should be replaced.

Policy DM DC 4 *Trees and Landscape* states that the borough's trees and landscape will be protected and enhanced. The policy notes that where trees are felled, the Council will normally require that an appropriate replacement be planted. It is also important to note that "landscape" refers to the design of all space between buildings, and includes walls and boundaries and paving materials, as well as planting.

The Arboricultural Impact Assessment identifies two large Category B street trees for removal to facilitate the development. It notes extensive crown pruning would be required for construction and some degree of root damage would be expected (irrespective of mitigation works). The two trees identified for removal stand 3m beyond the eastern boundary of the site just south of Gate D and the maintenance shed on the Rugby Road frontage. The report refers to the two trees as T2 and T3. Both are London Planes.

The significant highways trees have been valued by the Council's Tree Officer as assets, using the CAVAT valuation system which gives the trees values of £42,288 (T2) and £44,890 (T3). In order for such a loss of significant trees to be considered acceptable in

consideration of the policies LP 7.21 and DM DC 4 appropriate replacement trees are required. On this basis, a contribution will be secured via a Section 106 agreement for the full CAVAT values listed above to ensure future tree planting within the Borough and is included in the agreed Heads of Terms listed in this report.

Archaeology

DM HD 4 *Archaeological Sites* seeks to protect, enhance and promote archaeological heritage. The associated Map 1 identifies Archaeological Priority Areas (APA). The site is not within an APA and a condition has been recommended.

Community Infrastructure Levy

The development is liable for Mayoral CIL in accordance with the relevant charging schedules. The development is not liable for Borough CIL given its use fits within the 'standard charge (all other uses not covered above)' category of the adopted charging schedule which has a £0 per square metre charge.

Other Matters

Museum

The World Rugby Museum is currently provided within the East Stand at level 2. There is currently no direct public access to it and visitors need to be escorted to the entrance.

Policy CP20 encourages enhancement of existing tourist attractions including sport stadia, particularly those of the RFU. Policy DM SI 2 resists the loss of social infrastructure. The loss of the World Rugby Museum would be resisted and consideration needs to be given to the impact of the loss to the cultural offer, tourism and the local economy although there is nothing in planning terms which requires the museum to be kept open and therefore the loss can only be given limited weight.

The application states that the RFU's current intention is to relocate the museum to within the south-west drum of the stadium within the South Stand on level 2 within what is currently underused RFU office accommodation. This is illustrated in the Design and Access Statement including a programme for the works. If relocated to this location the RFU state that the museum would have a ground floor lobby directly accessible from the street significantly improving its accessibility and prominence. While details have been provided in the Design and Access Statement, the physical relocation of the World Rugby Museum is not proposed by this application.

The latest update from the RFU confirmed that "a [Board minute from the last meeting on the 9th November](#) stated that 'The proposal to Council (RFU Council) would assume that the museum moves to the space above the shop and Live room'
This will go forward to the [\[RFU\] Council meeting on the 2nd December](#)"

[A Head of Term has been agreed requiring relocation of a comparable museum facility within 3 years of commencement of use of the East Stand Extension.](#)

Construction

A Construction Logistics Plan (CLP) has been submitted to assess the potential transport implications of the development during the construction phase. It considers the cumulative impacts of construction occurring simultaneously at the East Stand and Richmond upon Thames College which benefits from planning permission and is within proximity to the application site.

The CLP establishes that the construction compound will be located in the north car park which will still be able to accommodate car parking, coach parking and the shuttle bus service.

The CLP estimates that during the peak construction period which is limited to two months there would be an estimated 23 construction vehicles servicing the East Stand site. There would be an additional month of 17 average daily trips before the number of average daily trips falls to below 5 for the remainder of the construction programme.

A planning condition is recommended for a CLP.

Screening Opinion

A Screening Opinion was issued by the Council on 22 June 2016 confirming that the Council did not consider the application for the development proposed at the East Stand required an Environmental Impact Assessment. Notwithstanding the red line site being slightly smaller for the site at the time of application, the application as made reflects the development considered by the Screening Opinion.

Recommendation

APPROVE [subject to a S106 agreement, conditions and informatives]

Standard Conditions

AT01 - Development begun within 3 years

DV48 - Approved drawings

Drawings

Existing

15735-001 Rev P01; 15735-003 Rev P01; 15735-005 Rev P01; 15735-010 Rev P01; 15735-011 Rev P01; 15735-012 Rev P01; 15735-013 Rev P01; 15735-014 Rev P01; 15735-015 Rev P01; 15735-016 Rev P01; 15735-017 Rev P01; 15735-018 Rev P01; 15735-020 Rev P01; 15735-021 Rev P01; 15735-022 Rev P01; 15735-023 Rev P01; 15735-030 Rev P01; 15735-031 Rev P01; 15735-032 Rev P01; 15735-033 Rev P01 received 15.7.16.

Proposed

15735-002 Rev P01; 15735-004 Rev P01; 15735-007 Rev P01; 15735-110 Rev P02; 15735-111 Rev P02; 15735-112 Rev P02; 15735-113 Rev P02; 15735-114 Rev P02; 15735-115 Rev P02; 15735-116 Rev P02; 15735-117 Rev P02; 15735-118 Rev P02; 15735-143 Rev P01; 15735-144 Rev P01; 15735-145 Rev P01; 15735-146 Rev P01; 15735-147 Rev P01; 15735-148 Rev P01; 15735-149 Rev P01; 15735-150 Rev P01; 15735-151 Rev P01; 15735-152 Rev P01; 15735-153 Rev P01; 15735-154 Rev P01; 15735-155 Rev P01; 15735-156 Rev P01; 15735-157 Rev P01; 15735-158 Rev P01; 15735-159 Rev P01; 15735-200 Rev P02; 15735-201 Rev P02; 15735-202 Rev P02; 15735-203 Rev P02; 15735-240 Rev P01; 15735-241 Rev P01; 15735-242 Rev P01; 15735-243 Rev P01; 15735-300 Rev P02; 15735-301 Rev P02; 15735-302 Rev P02; 15735-303 Rev P02; 15735-340 Rev P01; 15735-342 Rev P01; 15735-344 Rev P01 received 15.7.16
15735-346 Rev P01 received 22.7.16

15735-006 Rev P02; 15735-1000 Rev P1; 15735-1001 Rev P1; 15735-1002 Rev P1; 15735-1003 Rev P1 received 24.8.16
15735-341 Rev P02 received 15.11.16

Documents

Energy Statement Rev 9 received 21.10.16
BREEAM Pre-Assessment Rev F received 15.8.16
Sustainability Checklist dated August 2016 received 3.8.16
Planning Noise Report Rev 04 received 15.7.16
Flood Risk Assessment Rev 2 received 15.7.16
Arboricultural Impact Assessment received 15.7.16
Ecological Assessment received 15.7.16
Air Quality Assessment Rev D received 15.7.16
Kitchen Odour Risk Assessment received 15.7.16
REASON: To accord with the terms of the application, for the avoidance of doubt and in the interests of proper planning.

- BD12A** - Details - Materials to be approved
- DS04** - Access for disabled people #the building hereby approved#
- DV09** - No plumbing/pipes on ext' faces
- DV11** - Use of roof restricted
- DV18A** - Refuse arrangements
- DV30** - Refuse Storage
- DV28** - External illumination
- DV29F** - Potentially Contaminated Sites
- DV42** - Details of foundations - piling etc
- LB12B** - Archaeology
- LT01** - Location of trees - Adj' Dev't Sites
- LT02** - No felling/lopping (Tree Operations)
- NS** - Hard Landscaping - Details Required
Samples of materials for all hard landscape works as shown on approved drawing 15735-006 Rev P02 shall be submitted to and approved in writing by the Local Planning Authority. Hard landscaping works shall then be carried out in accordance with the approved details and in any event prior to the occupation of the development. REASON: To ensure that the proposed development does not prejudice the appearance of the locality and to preserve and enhance nature conservation interests

- LT16** - Prohibited Activities
- NO12** - Noise and Vibration of Plant- Specification/Layout
Prior to first occupation of the development hereby approved, a scheme for the control of noise and vibration of any plant (including details of ventilation, refrigeration, air conditioning and air handling units) to be used in pursuance of this permission shall be submitted to and approved in writing by the Local Planning Authority. This shall then be so installed prior to first occupation of the premises and this shall be so retained and operated in compliance with the approved scheme. REASON: To protect the amenity of occupiers of residents of nearby properties

- TEL02** - Removal of Graffiti
The applicant and/or future owner of the development hereby approved shall ensure that any graffiti or similar defacement is removed within seven days of being notified of it by the Local Planning Authority. REASON: To protect the visual amenities of the area.

- VR07** - Concourse Lighting
No concourse lighting shall be installed in the undercroft fronting Rugby Road of the development hereby approved other than in accordance with detailed drawings/specifications to be submitted to and approved in writing by the Local Planning Authority, such drawings/specifications to show design, siting, type and level of extent of illumination. REASON: To protect the amenities of the locality.

Non-Standard Conditions

- NS01** - Construction Logistics Plan
Prior to the commencement of development a Construction Logistics Plan (CLP) in line with London Freight Plan 2008 shall be submitted to and approved in writing by the Local Planning Authority. The approved CLP shall thereafter be adhered to throughout the construction period. The Plan shall:
- include phased drawings showing construction routes for plant and vehicles, traffic management layout and signage;
 - include analysis of access points to accommodate the swept paths of construction vehicles;
 - utilise selected operators that are committed to best practice and utilise selected operators that are committed to best practice and are a member of Transport for London's Freight Operator Recognition Scheme (FORS);and
 - ensure that delivery vehicles arrive one at a time and do not wait on Rugby Road at any time nor result in the stacking of vehicles coming into Gate D for construction causing any obstruction of the public highway, to avoid congestion, idling vehicles and potential increases to NO2.
- REASON: To ensure that the scheme accords with TfL guidance 'Building a better future for freight: Construction Logistics Plans' and policy 6.14 Freight of the London Plan (2015) by improving the safety and reliability of deliveries to the site, reducing road congestion for buses and general traffic and minimising the environmental impact during construction.
- NS02** - Construction and Environmental Management Plan
Prior to the commencement of development a Construction and Environmental Management Plan (CEMP) shall be submitted to and approved in writing by the Local Planning Authority. The approved Construction and Environmental Management Plan shall thereafter be adhered to throughout the construction period. The Construction and Environmental Management Plan shall address, but is not limited to, the following matters:
- pre-commencement checks/surveys for bats and other protected species and notable species, with subsequent mitigations as deemed appropriate;
 - further protected and notable species checks/surveys should demolition and/or construction works not take place until after the second anniversary of the date of approval of surveys submitted pursuant to a)
 - appropriate working practices and safeguards for other wildlife, flora and fauna that are to be employed whilst works take place on site
- REASON: In the interests of ecology, highway and pedestrian safety together with the amenity of the area.
- NS03** - Construction Method Statement
No development shall take place, including any works of demolition, until a Construction Management Statement (to include any demolition works) has been submitted to and approved in writing by the Local Planning Authority. The approved plan shall be adhered to throughout the construction period. The Statement shall provide for: 1. The size, number, routing and manoeuvring tracking of construction vehicles to and from the site, and holding areas for these

on/off site; 2. Site layout plan showing manoeuvring tracks for vehicles accessing the site to allow these to turn and exit in forward gear; 3. Details and location of parking for site operatives and visitor vehicles (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction); 4. Details and location where plant and materials will be loaded and unloaded; 5. Details and location where plant and materials used in constructing the development will be stored, and the location of skips on the highway if required; 6. Details of any necessary suspension of pavement, roadspace, bus stops and/or parking bays; 7. Details where security hoardings (including decorative displays and facilities for public viewing) will be installed, and the maintenance of such; 8. Details of any wheel washing facilities; 9. Details of a scheme for recycling/disposing of waste resulting from demolition and construction works (including excavation, location and emptying of skips); 10. Details of measures that will be applied to control the emission of noise, vibration and dust including working hours. This should follow Best Practice detailed within BS5288:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites; 11. Details of any highway licenses and traffic orders that may be required (such as for licences for any structures / materials on the highway or pavement; or suspensions to allow the routing of construction vehicles to the site); 12. Details of the phasing programming and timing of works; 13. Where applicable, the Construction Management Statement should be written in conjunction with the Arboricultural Method Statement, and in accordance with British Statement 5837:2012 'Trees in relation to design, demolition and construction - recommendations', in particular section 5.5, 6.1, 6.2, 6.3 and 7; 14. A construction programme including a 24 hour emergency contact number; 15. A deliveries schedule avoiding deliveries to/from the site in peak hours (0800 -0930 and 1600-1700 and if unavoidable ensure that a robust construction logistics plan is in place to ensure that delivery vehicles arrive one at a time and do not wait on Rugby Road at any time, to avoid congestion, idling vehicles and potential increases to NO2 16. See also TfL guidance on Construction Logistics Plans. 17. Details demonstrating how all construction-related activities in the North Car Park comply with the approved Ecological Assessment, particularly in respect of the relationship between construction-related activities and the Duke of Northumberland River 18. Details of a phasing plan to demonstrate how the stadium will continue to function on match and event days during construction including crowd management, access and egress, car and coach parking, deliveries and servicing and shuttle bus services. 19. Travel Plan for construction staff REASON: In the interests of highway and pedestrian safety together with the amenity of the area and ecology.

NS04 - Construction Noise Management Plan

A Construction Noise Management Plan (CNMP) for all ground works, demolition and construction phases of the development site to which the application refers, shall be submitted to and approved in writing by the LPA. Details shall include control measures for noise and vibration, including working hours, best practice and (noise and vibration levels). Approved details shall be implemented throughout the construction/demolition period.

The CNMP shall follow the Best Practice detailed within BS5288: 2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites. The CNMP should include an acoustic report undertaken by a suitably qualified and experienced consultant and include all the information below;

The following information must be supplied as part of the CNMP

- i. Baseline Noise Assessment – undertaken for a least 24-72 hours under representative conditions.

- ii.Noise Predictions and Significance Effects - Predictions should be included for each phase of the demolition, and construction, vehicle movements and an assessment (including proposed significance threshold limits) of the significance effect must be included (Annex E BS5288 2009 Part 1).
- iii.Piling- Where piling forms part of the construction process, a low vibration method must be utilised wherever possible and apply the good practice guidelines detailed in Annex B BS5288 2009 Part 2.
- iv.Vibration Monitoring - All Piling activities undertaken near sensitive receptors must include continuous vibration monitoring and must include audible and visual alarms.
- v.Proposed Noise & Vibration Mitigation Measures – Mitigation measures must be included as recommended by BS5288 part 1 &2
- vi.Proposed Noise Monitoring – Permanent/ Periodic noise and vibration monitoring must be undertaken for the duration of the demolition and construction phases which may result in a significant impact. The location, number of monitoring stations and the measurement data must be agreed with the Local Planning Authority prior to the start of construction.
- vii.Communication with residents, including organisational control, communication methods and auditing.
REASON: To protect the amenities of adjacent noise sensitive properties and minimise disturbance in the local area during construction.

- NS05** - Construction Dust Management Plan
- A Dust Management Plan for all ground works, demolition and construction phases of the development site to which the application refers, shall be submitted to and approved in writing by the LPA a dust management plan has been submitted to and approved by the Local Planning Authority. Approved details shall be implemented throughout the construction/demolition period.
- The dust management plan shall include the following details:
- (a) Demonstrates compliance with the guidance found in the control of dust and emissions from construction and demolition Best Practice produced by the Greater London Authority (GLA) http://static.london.gov.uk/mayor/environment/air_quality/docs/construction-dust-pg.pdf
 - (b) The dust management strategy must include a risk assessment of dust generation for each phase of the demolition and construction. The assessment and identified controls must include the principles of prevention, suppression and containment and follow the format detailed in the guidance above. The outcome of the assessment must be fully implemented for the duration of the construction and demolition phase of the proposed development and include dust monitoring where appropriate.
 - (c) where the outcome of the risk assessment indicates that monitoring is necessary, a monitoring protocol including information on monitoring locations, frequency of data collection and how the data will be reported to the Local Planning Authority;
 - (d) details of dust generating operations and the subsequent management and mitigation of dust demonstrating full best practicable means compliance and covering construction activities, materials storage, on and off site haul routes, operational control, demolition, and exhaust emissions; and
 - (e) where a breach of the dust trigger level may occur a response procedure should be detailed including measures to prevent repeat incidence
- REASON: To comply with best practice as set out in the Control of dust and emissions during construction SPG to protect the amenity of nearby properties.

- NS06** - Non Road Mobile Machinery (NRMM)

All Non Road Mobile Machinery (NRMM) used on the construction of the development must be registered online with the Greater London Authority's NRMM website <http://nrmm.london/>. All NRMM must be compliant with the requirements of the Greater London Authority's Low Emission Zone Policy.

REASON: In the interests of minimising the impact on air quality.

NS07 - RFU Match and Event Days

There shall be no construction works within Twickenham Stadium on Major Event Days .

REASON: In the interests of general safety and highways safety.

NS08 - Green Wall

Within three months of commencement of construction of the approved development, full details of an extensive green wall to be located on the western flank wall of the development as shown on approved plan 15735-341 Rev P02 shall be submitted to approved in writing by the Local Planning Authority. The submission must provide/comprise the following information:

- a) Details on materials used in the design, construction and installation of the green wall and the use of biodiversity based extensive/semi-intensive soils;
- b) Details on substrate and plants used in the green wall, prioritising the use of native species and a cross section of the green wall;
- c) Details on additional ecological features to be incorporated within the proposed green wall; and
- d) A 10 year management and maintenance plan including any landscape and/or ecological features.

The development shall be carried out strictly in accordance with the green wall details approved in writing by the Local Planning Authority and prior to the first occupation of the building. The green wall shall be maintained as such thereafter in accordance with the approved management and maintenance plan and no alterations to the approved scheme shall be permitted without the prior written consent of the Local Planning Authority. The development hereby approved shall not be occupied until evidence that the green wall has been installed in accordance with the approved details has been submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the development has an acceptable level of sustainability.

NS09 - Bird Boxes

Details including number, type, specification, height and location of bird boxes (minimum of three sparrow terrace boxes) to be submitted to and approved in writing by the Local Planning Authority and thereafter to be implemented as approved prior to the first occupation of the building.

REASON: To ensure the implementation of ecological enhancement measures in the interests of ecology and proper planning.

NS10 - Lighting Strategy

Within 3 months of the commencement of development a Lighting Strategy for internal lighting shall be submitted to and approved in writing by the Local Planning Authority. Such strategy to include:

- a) Details of proposed operating times and levels for all lighting in the development;
- b) Details of measures to control lighting when the development is not in use;
- c) Details of measures to control lighting when the development is in use such that it does not cause unacceptable adverse impacts on nearby properties; and

- d) A maintenance plan to ensure such details are maintained for the life of the development.

The approved Lighting Strategy shall be implemented prior to the use of the development commencing and thereafter the lighting shall be maintained in accordance with the approved Strategy.

REASON: To protect the amenity of nearby properties and in the interests of reducing the energy consumption of the development.

NS11 - Acoustic Compliance Report

Within 28 days of the first occupation of the building, an acoustic compliance report must be submitted to the Local Planning Authority which demonstrates that the development has complied with condition NS 12.

REASON: In the interests of amenity of nearby properties.

NS12 - Mechanical Services Noise Control Condition

a) The mechanical services plant hereby permitted shall be installed in strict accordance with the details provided in the approved Planning Noise Report submitted by Vangaurdia Consulting reference VC-102159-AA-RP-0002 dated 27/06/2016 and approved drawings. The plant shall thereafter be retained as approved. The plant shall not be used unless the equipment is installed in compliance with these details.

b) A commissioning acoustic assessment shall be undertaken within 2 weeks of mechanical services commissioning, in order to demonstrate that the Plant Noise Criteria detailed in Table 9 and Table 12 in the Planning Noise Report submitted by Vangaurdia Consulting reference VC-102159-AA-RP-0002 dated 27/06/2016 has been achieved. The results of the assessment shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of adjacent noise sensitive properties and minimise noise impacts generally.

NS13 - Commercial Kitchen Extraction Odour Control

The commercial kitchen extraction plant and equipment hereby permitted shall be installed in strict accordance with the details provided in the Kitchen Odour Risk Assessment report submitted by Air Quality Consultants Ltd reference J2581/1/F3 dated 12th July 2016 and approved drawings and specifically the odour abatement systems detailed in Table 3 in section 3 of the report. The plant shall thereafter be retained as approved. The plant shall not be used unless the equipment is installed in compliance with these details

REASON: To minimise the impact of kitchen odour to protect the amenity of nearby properties.

NS14 - Energy

The development shall be implemented in accordance with the approved Energy Statement Rev 9 and shall not commence until full Design Stage calculations under the National Calculation Method have been submitted to and approved in writing by the Local Planning Authority to show that the development will be constructed in accordance with the approved Energy Strategy (Energy Statement Rev 9).

Prior to first occupation of the building(s) evidence (e.g. photographs, installation contracts and as-built certificates under the National Calculation Method) shall be submitted to the Local Planning Authority and approved in writing to show that the development has been constructed in accordance with approved Energy Statement Rev 9.

REASON: To ensure that the development makes the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan Policy 5.2.

NS15 - BREEAM – Very Good

- a) Within three months of work starting on site a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) Design Stage certificate and summary score sheet must be submitted to and approved in writing by the Local Planning Authority to show that a Very Good rating (with a minimum score 60 and all mandatory BREEAM Excellent credits) shall be achieved.
- b) Within 3 months of completion of the building hereby approved a BREEAM UK New Construction 2014 (or such equivalent standard that replaces this) Post Construction Review certificate and summary score sheet shall be submitted to and approved in writing by the Local Planning Authority to show that a Very Good rating (with a minimum score 60 and all mandatory BREEAM Excellent credits) has been achieved. All the measures integrated shall be retained for as long as the development is in existence.
- c) Within three months of completion of the building(s)work starting on site a BREEAM Refurbishment and Fit-out (Parts 1, 2, 3 and 4) 2014 (or such equivalent standard that replaces this) Design Stage Certificate and London Borough of Richmond Upon Thames, Twickenham RFU East Stand summary score sheet must be submitted to and approved in writing by the Local Planning Authority to show that a Very Good rating (with a minimum score 65 and all mandatory BREEAM Excellent credits) shall be achieved.
- d) Within 3 months of completion of the building hereby approved a BREEAM Refurbishment and Fit-out (Parts 1, 2, 3 and 4) 2014 (or such equivalent standard that replaces this) Post Construction Review certificate and summary score sheet shall be submitted to and approved in writing by the Local Planning Authority to show that a Very Good rating (with a minimum score 65 and all mandatory BREEAM Excellent credits) has been achieved. All the measures integrated shall be retained for as long as the development is in existence.

REASON: In the interests of promoting sustainable forms of developments and to meet the terms of the application.

NS16 - Combined Heat and Power (CHP)

Within three months of the commencement of the development hereby approved, full details and specification of the Combined Heat and Power (CHP) system, including location of all elements of the system including the flue and an emissions control scheme for the proposed CHP, and which parts of the development the CHP serves, shall be submitted to and approved in writing by the Local Planning Authority.. The CHP shall thereafter be installed in accordance with the details approved in writing by the Local Planning Authority prior to the first use of the development.

REASON: In the interests of reducing carbon emissions and protecting air quality.

NS17 - Boundary Enclosure

Within three months of the commencement of the development details of the gates, fence and turnstiles forming the external boundary of the application site, and any other associated measures to improve the resilience of East Stand, shall be submitted to and approved in writing by the Local Planning Authority. The relevant part of the development shall then be built out in accordance with those details and retained in situ thereafter.

REASON: To ensure that the proposed development does not prejudice the appearance of the locality and contributes to the creation of safe, inclusive and

resilient places in accordance with Core Strategy Policy CP7 and London Plan (2016) policy 7.13.

- NS18** - Glazing Details
Details of all glazed elements of the building façade including glazing specification (including measures to reduce solar glare), rebates, method of fixing, framing to support glazing and any additional measures to reduce solar reflectance shall be submitted to and approved in writing by the Local Planning Authority within 3 months of commencement of construction of the development. The development shall then be built out in accordance with these details.
REASON: To minimise to an acceptable level the impact of solar glare from the development on road users in the interests of highways safety and to increase the resilience of the development in accordance with London Plan (2016) policies 7.7 and 7.13 and Core Strategy Policy CP 7.

- NS19** - Road Safety Audit
Prior to the commencement of development a programme for a Stage 2 Road Safety Audit specifically assessing the impact of solar glare/reflectance from the development
a) shall be submitted to and approved in writing by the Local Planning Authority. This programme shall
i) Set days/times for the assessment of the effect of the solar glare/reflectance from the development
ii) Include a methodology with clear objectives, targets, actions and timeframes for assessment and reporting of results with recommendations

Stage 2 Road Safety Audit shall be carried out in accordance with the approved programme. In the event that the Stage 2 Road Safety Audit identifies any risks caused by the development (including from solar glare/reflectance), within 28 days of completion of the Stage 2 Road Safety Audit, details of further measures to mitigate such identified risks, including a programme for implementation and review, shall be submitted to and approved in writing by the Local Planning Authority. Thereafter such measures shall be implemented in accordance with the approved details and the programme of implementation and review.

REASON: In the interests of highways safety and to minimise risk to road users.

- NS20** - Service and Delivery Management Plan
A Service and Delivery Service Plan shall be submitted to and approved in writing by the Local Planning Authority and thereafter the approved Plan shall be implemented prior to the first use of the development and maintained for the life of the development unless otherwise agreed in writing with the Local Planning Authority. Such plan to include at minimum the number and type of vehicles, day and time of deliveries (in relation to event day/time), site access and location of delivery at the site. The Plan shall also ensure that the stacking of vehicles coming into any gate for servicing must not result in any obstruction of the public highway at any time.
REASON: To ensure that the proposed development does not prejudice the free flow of traffic, the conditions of general safety along the neighbouring highway or the amenities of the area.

- NS21** - Real-time Transport Information Screens
Details of real-time transport screens (providing information on local public transport options) to be provided in public areas including number, location and information shall be displayed to be submitted to and approved in writing by the

Local Planning Authority and thereafter installed in accordance with the approved details prior to first use of the development.

REASON: To promote sustainable modes of transport in the interests of good transport planning and reducing the impact of the development on air quality.

- NS22** - Maximum Attendance
The maximum capacity for any event shall not exceed 82,000 guests/spectators.
REASON: To limit the impacts of the development to those assessed.
- NS23** - Operating Times
When hospitality facilities are being used in conjunction with a Major Event, such facilities shall close to guests no later than 90 minutes after the end of the Major Event.
REASON: To minimise the economic impact of the development on town centres and minimise impacts on the amenity of local residents and transport.
- NS24** - Access to Hospitality Facilities – Major Events
When hospitality facilities are used in conjunction with Major Events, they shall be accessible to those attending on hospitality packages (Corporate or Debenture Hospitality) only (and not at any time to General Admission ticket holders).
REASON: To minimise the economic impact of the development on Twickenham and Whitton town centres.
- NS25** - Operating Times – Terrace
The terrace hereby permitted at Level 05 of the development shall not be in use between the hours of 2300 and 0700 on any day.
REASON: To protect the amenity of nearby properties.
- NS26** - Restriction –Hospitality Tickets -
The number of Hospitality Tickets sold (each ticket being equivalent to one guest) for any event at Twickenham Stadium shall not exceed 13,250 of which the number of Corporate Hospitality Tickets shall not exceed 10500 .
REASON: To minimise impacts on the town centre.
- NS27** - Restriction – Hospitality Tickets
The number of Hospitality Tickets sold (each ticket being equivalent to one guest) for any Major Event at Twickenham Stadium shall not exceed 13,250 subject to the following :
- a) The number of Hospitality Tickets sold (each ticket being equivalent to one guest) for any Major Event at Twickenham Stadium where the development hereby approved is used to provide such hospitality shall not exceed 6,850 within the development hereby approved.
 - b) For RFU events, of the 6,850 tickets within the development hereby approved, no more than 4,600 tickets shall be sold for Corporate Hospitality and no more than 2,250 tickets shall be sold for Debenture Hospitality.
REASON: To minimise impacts on the town centre.
- NS28** - Access to Hospitality Facilities
The development hereby permitted shall not be used at any time other than by guests of Major Events or Non-Major Events hosted at Twickenham Stadium and those on pre-organised RFU tours of Twickenham Stadium and shall not be accessible at any time to visiting members of the general public.
REASON: To ensure the hospitality facilities are used for their intended purpose only and not any other purpose such as a restaurant or bar outside of stadium

events to minimise the economic impact of the development on Twickenham and Whitton town centres and on the amenity of nearby properties.

- NS30** - CCTV
Within six months of commencement of development details of CCTV cameras to be used in conjunction with the development shall be submitted to the Local Planning Authority. Work shall not commence on this part of the development until the submitted details are approved in writing by the Local Planning Authority. The approved CCTV cameras shall thereafter be installed and operational prior to the first use of the development.
REASON: In the interests of Secured by Design principles to ensure a safe and secure environment.
- NS31** - Amplified Noise
There shall be no amplified noise within the hospitality areas and terrace such that it is audible outside the application site.
REASON: To protect the amenity of nearby properties.
- NS32** - Porous Hardsurfacing
That all new external hardsurfacing shall be porous and constructed and laid out in accordance with details to be submitted to and agreed in writing by the Local Planning Authority.
Reason: In the interest of sustainable construction and to avoid excessive surface water runoff.
- NS33** - The disabled lift shall not be constructed otherwise than in accordance with details to be submitted to and approved in writing by the Local Planning Authority, such details to specify the design and external finishes thereof. The agreed lift shall be implemented before the development hereby permitted is brought into use
REASON: To ensure the provision of a satisfactory and convenient form of development for people with disabilities.
- NS35** - Glazing During Construction
Prior to commencement of development details of coverings for all glazed elements of the development hereby approved during its construction shall be submitted to and approved in writing by the Local Planning Authority. All glazed parts of the development shall be covered in accordance with the approved details from time of installation until such time as may be agreed in writing by the Local Planning Authority.
REASON: To minimise any potential period of impact from solar glare in advance of undertaking a Stage 2 Road Safety Audit in the interests of highways safety.
- NS36** - Southern Access/Egress on Rugby Road
The new access/egress proposed from Rugby Road shall be used only in emergencies and/or for pedestrians and emergency vehicles only and not used by any other vehicles at any time.
REASON: To ensure that the access is used in accordance with its intended use for which it has been tested and assessed in the interest of highways safety.
- NS38** - Structural Columns- Details
Prior to commencement of development details of structural columns, including a cross-section and materials, shall be submitted to an approved in writing by the Local Planning Authority. The development shall then be built in accordance with

the approved details. REASON: In the interests of delivering a resilient building pursuant to London Plan Policy 7.13.

Standard Informatives

COMH07 -Composite Informative

Reason for granting:The proposal has been considered in the light of the Development Plan, comments from statutory consultees and third parties (where relevant) and compliance with Supplementary Planning Guidance as appropriate. It has been concluded that there is not a demonstrable harm to interests of acknowledged importance caused by the development that justifies withholding planning permission. **Principal Policies:** Where relevant, the following have been taken into account in the consideration of this proposal:- National Planning Policy Framework (NPPF)

London Plan: The Spatial Strategy (2016) Policies: 2.6, 2.7, 2.16, 3.19, 4.5, 4.6, 4.7, 5.2, 5.3, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 6.3, 6.10, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6, 7.7, 7.13, 7.14, 7.15, 7.19, 7.21

Core Strategy (2009) Policies: CP 1, CP 2, CP 3, CP 4, CP 5, CP 7, CP 8, CP 20

Development Management Plan (2011) Policies: DM DC 1, DM DC 3, DM DC 4, DM HD 4, DM SD 1, DM SD 2, DM SD 4, DM SD 5, DM SD 6, DM SD 7, DM SD 9, DM SD 10, DM OS 2, DM OS 5, DM TP 1, DM TP 2, DM TP 3, DM TP 6, DM TP 7, DM TP 8, DM DC 5, DM SI 2

SPDs/SPGs: Sustainable Design and Construction (2014); The control of dust and emissions during construction and demolition (2014); Character and Context (2014); Accessible London: Achieving an Inclusive Environment (2014); Design Quality (2006); Planning Obligations (2014); Refuse and Recycling Storage Requirements (2015); Sustainable Construction Checklist (2016); Security by Design (2002)

Building Regulations The applicant is advised that the erection of new buildings or alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made. For application forms and advice please contact the Building Control Section of the Street Scene department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411). If you alter your proposals in any way, including to comply with the Building Regulations, a further planning application may be required. If you wish to deviate in any way from the proposals shown on the approved drawings you should contact the Development Control Department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411).

Damage to the public highway Care should be taken to ensure that no damage is caused to the public highway adjacent to the site during demolition and (or) construction. The Council will seek to recover any expenses incurred in repairing or making good such damage from the owner of the land in question or the person causing or responsible for the damage.

BEFORE ANY WORK COMMENCES you MUST contact Highways and Transport, London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ (Telephone 020 8891 7090 ask for the Streetscene inspector for your area or email highwaysandtransport@richmond.gov.uk) to

arrange a pre commencement photographic survey of the public highways adjacent to and within the vicinity of the site. The precondition survey will ensure you are not charged for any damage which existed prior to commencement of your works.

If you fail to contact us to arrange a pre commencement survey then it will be assumed that any damage to the highway was caused by your activities and you will be charged the full cost of repair.

Once the site works are completed you need to contact us again to arrange for a post construction inspection to be carried out. If there is no further damage then the case will be closed. If damage or further damage is found to have occurred then you will be asked to pay for repairs to be carried out.

Noise control - Building sites; The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department. Under the Act the Council has certain powers to control noise from construction sites. Typically the council will limit the times during which sites are permitted to make noise that their neighbours can hear. For general construction works the Council usually imposes (when necessary) the following limits on noisy works:- Monday to Friday 8am to 6pm Saturdays 8am to 1pm Sundays and Public Holidays- No noisy activities allowed Applicants should also be aware of the guidance contained in British Standard 5228;2009- Noise and vibration control on construction and open sites. Any enquiries for further information should be made to the Commercial Environmental Health Team, 2nd Floor Civic Centre, 44 York Street, Twickenham TW1 3AB.

- IE01A** - Food Hygiene
The applicant is advised to contact Commercial Environmental Health Team, 2nd Floor Civic Centre, 44 York Street, Twickenham TW1 3AB with regard to Food Hygiene Regulations.
- IE06** - Details of piling-EHO consultation
The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department. Where developments include foundations works require piling operations it is important to limit the amount of noise and vibration that may effect local residents. There are a number of different piling methods suitable for differing circumstances. Guidance is contained in British Standard BS 5228 Noise control on Construction and Open Sites - Part 4: Code of Practice for noise and vibration control applicable to piling operations. Where there is a risk of disturbance being caused from piling operations then the council under section 60 Control of Pollution Act 1974 can require Best Practicable Means (BPM) to be carried out. This may entail limiting the type of piling operation that can be carried out. The types of piling operations which are more suitable for sensitive development in terms of noise and vibration impact are; Hydraulic Piling * Auger Piling * Diaphragm Walling
- IH03B** - Vehicular Crossover
The permission hereby granted shall not be construed as authority to carry out works on the publicly maintained highway. The applicant is advised that all such

works must be carried out by the Council's own appointed contractor following approval from Highways Management Group, London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ or highwaysandtransport@richmond.gov.uk. Further details and application forms can be obtained from the Civic Centre by telephoning 0845122660 or online <http://www.richmond.gov.uk/crossovers.htm>. Application forms must be accompanied by a copy of the planning consent to which the application relates and the relevant part of the approved drawing. The cost of these highway works will be charged to the applicant.

IH05A - Street Trees

The applicant must consult Streets Tree Section, London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ (Telephone 020 8891 7808) with regard to arrangements for the removal of street trees (s) and any replacements they may consider appropriate.

IL10A - Building Regulations Required

The applicant is advised that the erection of new buildings or alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made. For application forms and advice please contact the Building Control Section of the Street Scene department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411).

IL12A - Approved Drawings Numbers

If you alter your proposals in any way, including to comply with the Building Regulations, a further planning application may be required. If you wish to deviate in any way from the proposals shown on the approved drawings you should contact the Development Control Department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 7300).

IL13 - Section 106 Agreement

This planning permission has a Section 106 Agreement which must be read in conjunction with it.

IL24 - CIL Liable

The applicant is advised that this permission results in a chargeable scheme under the Borough's and the Mayor of London's Community Infrastructure Levy.

IL25B - NPPF APPROVAL - Para. 186 and 187

In accordance with paragraphs 186 and 187 of the National Planning Policy Framework, Richmond upon Thames Borough Council takes a positive and proactive approach to the delivery of sustainable development, by:

- Providing a formal pre-application and duty officer service
 - Providing written policies and guidance, all of which is available to view on the Council's website
 - Where appropriate, negotiating amendments to secure a positive decision
 - Determining applications in a timely manner.
- In this instance:
- The application was acceptable as submitted, and approved without delay.
 - The application was amended following negotiations with the Council to ensure the scheme complied with adopted policy and guidance, and a decision was made without delay.

- The application was recommended for approval and referred to the first available Planning Committee, where the agents / applicants had an opportunity to present the case.

IL29 - Construction Management Statement
The applicants are advised that when drafting the Construction Management Statement, as secured via condition, each 'point' of the condition should form a sub-heading in the Statement. Where a point is not applicable please state this, with justification.

IX03 - Soil and surface water drainage
The applicant is advised to consult Thames Water Utilities, Sewerage and Sewage Treatment Operations, Hogsmill Valley Works, Lower Marsh Lane, Kingston, KT1 3BW (Tel: 020 8213 8729) about the disposal of surface water and/or sewage from the development.

Non-Standard Informatives

NI01 - Combined Heat and Power (CHP)
CHP flue must be approximately 1m high above roof level to avoid adverse effects on dispersion. All boilers including the CHP must have NOx emissions of less than 0.04 g/KWH of heat supplied.

NI02 - TLRN Footways and Carriageways
Footways and Carriageways
The footway and carriageway on the A316 Chertsey Road must not be blocked during the extension. Temporary obstructions during the extension must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A316 Chertsey Road.
No skips or construction materials shall be kept on the footway or carriageway on the TLRN at any time. Should the applicant wish to install scaffolding or a hoarding on the footway whilst undertaking this work, separate licences may be required please see,
<https://www.tfl.gov.uk/info-for/urban-planning-and-construction/highway-licences>

NI03 - Definitions
Major Event: an event at Twickenham Stadium attended by 30,000 people or more. These may include such events as International Rugby events, other sporting events, concerts.

Larger Scale Non-Major Event: an event at Twickenham Stadium attended by more than 3,000 people. These may include such events as large conferences, banquets or weddings.

Smaller Scale Non-Major Event: an event at Twickenham Stadium attended by fewer than 3,000 people These may include such events as conferences, banquets or weddings.

NI04 - Lowest Reflectance Glazing
The applicant is advised that details submitted pursuant to condition NS18 Glazing Details should use the lowest reflectance (5%) glazing on the adjoining bays south-eastwards, up to the next opaque element, which on elevation (drawing no : 15735-3546-P01) submitted is the area to the left of the red glazing while on the plan this is the area to the right of the red glazing. This is because

there are points, between viewpoints 4 and 5 at which these glazing panels are close to the line of sight of drivers and could reflect sunlight to them, which have not been modelled in Point 2's Daylight, Sunlight and Solar Glare Report received 21st July 2016 or in subsequent correspondence.