

Comment on a planning application

Application Details

Application: 24/2800/FUL

Address: David Lloyd Staines Road Twickenham TW2 5JD

Proposal: Conversion of existing tennis courts to padel courts with associated lighting and canopies and removal of existing tennis floodlighting and fencing.

Comments Made By

Name: Mr. Peter Woolliams

Address: 25 Taylor Close Hampton Hill Hampton TW12 1LE

Comments

Type of comment: Object to the proposal

Comment: New sporting facilities at the David Lloyd centre supports wellness and local fitness which is important and it is clear that the design follows good practice for safety of players. The documents provided have significant missing information around lighting and noise pollution that are needed to fully assess it against the national and local planning policies, as it stands it should be rejected as it is highly likely that the current designs would not be compliant. Of the valid reasons to object this application is covered by: Noise and disturbance, Local and national policies and nature conservation.

The changes to floodlighting make no mention of the design or potential light pollution generation covered by NPPF section 15 (conserving and enhancing the natural environment) and the 2018 Richmond Local Plan section LP9- Floodlighting that notes that mitigations and the impact of nearby biodiversity are important considerations to address. Also LP10 on (light) pollution.

The existing lighting at the Centre already results in significant light trespass over the Hampton Heath site of interest for nature conservation (sinc) which should be protected against impacts that will harm the wildlife found there. Artificial light at light (even very low levels) are increasingly being demonstrated to have significant negative effects on a wide range of plant, invertebrate, aquatic and other species including humans.

The lighting should be designed by a suitably qualified lighting consultancy using modelling to predicted light distribution and adjustments made to its design to avoid any escape beyond the boundary of the site.

It is not sufficient to just use "full cut off" fittings as with the very tall poles is likely to result in significant light trespass, especially as court sides are transparent. "Warmer" colour lights must be used with a minimum blue light content as this is shown to have the greatest impact on wildlife, a "colour temperature" of <3000K should be used, ideally lower. The lighting levels should comply with (not exceed) those recommended by good practice, eg sports lighting guidance from the Institute of lighting professionals or Sports England. It is likely that fully opaque site fencing will be needed. Care is also needed that light scattering off the transparent roof (from dirt/wear) is suitably baffled so that it does not become a source of light trespass itself.

Well designed lighting of the outdoor facilities at the Centre could enable reduce energy costs, optimum illumination for users and a darkening of the Heath area which would benefit the work of the Heath Friends in seeking to improve its already impressive biodiversity and would demonstrate the Centre's sustainability credentials. This would be inline with the Local Plan Floodlighting section that states "Favourable consideration will be given to the replacement or improvement of existing lighting where it provides improvements to existing adverse impacts."

As Padel is played with hard bats it can generate higher levels of noise compared to tennis. No consideration is provided or mitigations given the proximity to nearby housing and the Heath.

<https://www.mediterrapadel.com/en/blog/22/managing-padel-court-noise-how-far-should-they-be-from-residential-areas> suggests at least 100m between Padel courts and the nearest houses, the closest homes are around 90m away. This is covered by LP10 of the Richmond local Plan on noise pollution. The Richmond noise SPD gives more guidance.

https://www.richmond.gov.uk/media/8394/spd_noise_generating_and_noise_sensitive_development_2016.pdf A design and survey assessing the potential noise levels, its impact and mitigations should have been provided to avoid potential

future complaints. Padel is a new sport so potential impacts are not as well understood. Barriers needed to block light pollution could also act as acoustic barriers and thus reduce the overall costs of installation delivering the best outcome.