

Land at Lionel Road South, Brentford

Variation of condition 7i of planning permission ref 00703/A/P11 for the use of the Brentford Community Stadium to allow for the playing of professional rugby (00703/A/P15)

Comments from the West Chiswick and Gunnersbury Society

1. The Society requests that a decision on amending the Condition that restricts use of the ground to football be deferred until the stadium is constructed, commissioned and real experience of its use on match days has been gained.

2. The Condition was considered necessary by the LPA “to minimise disruption of the local environment”. The extent to which the various control measures specified (eg LAMP) will in reality satisfactorily mitigate the negative impacts, which the LPA recognises will be “inevitable with large crowds”, is unknown.

3. The applicant claims that the harm and disruption caused by a rugby match would be no greater than that caused by a football match. While this may be so, the number of days on which this harm and disruption would be experienced would increase very significantly. Permitting 16 - 22 rugby matches in addition to 26 - 28 football matches would give a total of 42 - 50 matches. Most of these matches would be played on a Saturday or Sunday and, since matches on consecutive days would be avoided to lessen damage to the pitch, this would result in a match taking place practically every weekend during the 9-month football/rugby season.

4. The harm and disruption on match days was described in the Planning Officer's Report (POR) on the stadium presented to the Planning Committee on 5 December 2013. *The Society's comments on the current application for the addition of rugby are provided partly in the form of annotated extracts from this POR; these are included as an annex to this statement.* Match days will have a negative impact not only on residents (existing communities and future residents of stadium-associated development) and visitors to the area but also on local businesses, visitor attractions and sporting facilities.

5. The application attempts to assign values, monetary or otherwise, to the claimed **socio-economic** and **cultural and community benefits** of London Irish using the stadium for professional rugby. If, the LPA is prepared to accept such claims as material considerations, it must, in fairness, seek to similarly assign values to the dis-benefits. In order to do this, it should commission an independent and robust analysis of these.

6. In relation to the socio-economic impact of rugby at the stadium, the applicant (PS 7.13) suggests that there is “potential for London Irish to generate a net additional supporter spend in the local area between £2,789-£3,978 million per annum” This is likely to be an over-estimate of the benefit to local businesses (even if the ambitious attendance targets are met) as it fails to take account of the proportion that would be spent “in-stadium”. Encouraging supporters to stay and spend on Club premises is part of the retention strategy to ease pedestrian overcrowding on streets and public transport at the end of matches. In addition to critically evaluating the applicant's

claims, the LPA needs to obtain an estimate of the potential loss to local businesses etc due to match-day disruption in order to arrive at a cost-benefit analysis.

7. The applicant states that London Irish's move to Lionel Road South will also have the potential to generate between 11-22 additional full time operational roles within the stadium itself. We question the likelihood of London Irish relocating personnel from Sunbury, the centre of the club's activity other than on professional rugby match days. In any case, no new jobs would be generated by any such relocation.

8. The applicant makes reference to planning policies in support of the visitor economy such as "London Plan Policy 4.5 London's Visitor Infrastructure also directs Local Authorities to support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London." In this context, it is essential to take a holistic approach and evaluate the net impact on the visitor economy and leisure offer of the area.

9. As stated above, for a proper evaluation of the above aspects of the current application, the LPA needs to commission an independent and robust analysis of the negative impact including estimates of the costs of the "dis-benefits". This should include, for example, the loss of income due to reduced visitor numbers at visitor attractions such as the Steam Museum, the Musical Museum and RBG Kew, at sport facilities such as the Fountain Leisure Centre and the loss of income to local businesses due to access problems for their regular customers. These costs need to be set against the claimed financial benefits of the proposal.

10. While more difficult to quantify, the **negative social impact** in terms of diminished quality of life also need to be included in this analysis. This would include the need for local residents and visitors to the area to plan their weekend activities around match fixtures during the 9-month football/rugby season. As one example, families taking children to the Fountain Leisure Centre would need to avoid match arrival and departure times. This would seriously curtail opportunity for active sport practically every weekend during the season. This would have a negative impact on health and well-being. Providing an opportunity for spectator sport is no substitute. Participation in sport in Hounslow is already low in comparison to other London boroughs (Local Plan GB9 Notes).

11. The applicant acknowledges (PS para 7.8) that the expected use of **Gunnorsbury Station** by rugby supporters will be higher than that of football supporters. The EIA 7.7.3 states "A total of 2,440 supporters were forecast to travel to and from the Stadium using Overground and Underground services at Gunnorsbury Station on a football match day. This is projected to increase to 2,827 supporters for a rugby match day with an attendance of 14,000 and 4,038 supporters for a rugby match day with an attendance of 20,000. At a typical Stadium, supporters would tend to arrive at the ground over a longer period than they would typically depart."

12. The Society refutes the claim (EIA 7.7.4) that "Given that rugby matches will only occur on weekends, the management measures proposed within the original Brentford Community Stadium Transport Assessment dated May 2013 and Transport Assessment Addendum dated September 2013 are therefore still deemed appropriate."

Residents and other local users are currently advised by TfL to avoid using the station during week-day commuter peak times. It will become necessary to extend this advice to weekend match-day peak times. Meanwhile, arrival for occasional evening matches will fall within commuter peak times.

13. Without prejudice to our request under paragraph 1 above, the Society requests that, should the application be approved, s106 funding is sought for improvements to public transport in mitigation of the harmful impacts that would result from the application proposals. Capacity improvements will be needed at Gunnersbury and Kew Bridge Stations to cope with increased demand on even more days per year:

- Level access to Gunnersbury Station platforms and to the westbound platform at Kew Bridge Station in order to improve disabled access to the sporting venue which would now be more intensively used;
- Staffing funding agreement with TFL for crowd control on rugby match days at Gunnersbury Station due to the higher projected numbers of rugby spectators travelling via Gunnersbury Station compared to football spectators in the already permitted scheme.

14. The Society notes with grave concern that (PS 7.15) “The **air quality** assessment concludes that there will be a moderate adverse impact on the concentrations as a result of additional traffic movements along the public highway.” The entire borough is an Air Quality Management Area (AQMA) for NO₂ and PM₁₀ and the Council’s map of Air quality (Context and Character Study, pages 29 and 30) shows that the road network around the stadium suffers from some of the highest levels of air pollution in the borough. The serious health impacts of such pollution are well known and acknowledged in the Local Plan. It is of no consolation to learn that “if the air quality impacts associated with rugby match day traffic had been assessed at the time of the original 2013 Planning Application then the impacts resulting from the dual use would have been defined as minor adverse. However, the change in assessment criteria that was introduced in 2015 has increased this impact.” We note that this change in assessment came about in recognition of the greater significance of impacts that occur where there is already an exceedance of the air quality standard. We would also point out that, if the impacts associated with football match traffic were to be reassessed using the current criteria, their impact would also be increased.

Annex

Extracts from Planning Officer Report on original stadium application (00703/A/P11) for Planning Committee 5 December 2013

Some key statements within the report are shown in red; WCGS comments are added in blue.

F. Stadium Operation and Impacts (pg 127)

9.312 The stadium would be used for football for 26-28 games a year, with most taking place on Saturday afternoons (typically 3:00pm kick off), and up to six on a Tuesday evening (typically 7:45pm kick off). At other times it would accommodate the management offices of BFC, and also accommodate offices for the BFC

Community Sports Trust, the Learning Zone, and the Interim Education Centre. On non-matchdays the stadium's function rooms and hospitality facilities would be available for commercial use such as for conferences. Use for rugby would significantly increase the total number of match days and therefore the impact; London Irish play 16-22 home games per season – mainly on Saturdays but with some on Sundays and Friday evenings.

1. Matchday Use

9.313 Many objections raise concerns about the impacts of large crowds, including the influx of non-residents to the area and the associated potential for anti-social behaviour, hooliganism, property crime, safety hazards, noise and general overcrowding. Disruption of access to other attractions such as Kew Gardens and Kew Steam Museum, and use of riverside walkways and pubs are also concerns. Other objections relating to rock concerts and rugby may be discounted as they are not currently proposed and would require a further planning application. Many more match days would mean many more days with negative impact on local environment/communities including disruption of access to other visitor attractions and sports facilities.

9.314 The proposal would significantly increase the capacity of BFC compared to its existing ground (extra 7,700), and would allow it to cater for larger numbers of away supporters. Consequently, if used to capacity, larger numbers of people would be coming and going in the area, with the relocation shifting activity to new areas not previously subject to significant impacts from a football stadium. This would create both real and perceived impacts on local residents, primarily through disruption on match-days from crowds using public transport such as trains and buses, using footpaths, and additional parking demand. Other impacts such as litter, noise, and use of outdoor areas and public houses are also likely.

9.315 Some impacts are inevitable with large crowds, and although the disruption would be limited to match days and temporary in nature, without satisfactory management they would potentially have negative effects on residents that do not presently experience such impacts. The major impacts expected are discussed below, though detailed traffic and transport effects are dealt with separately later in the report. Addition of rugby would mean many more days with negative impact on residents, local businesses, visitor attractions and sports facilities.

9.319...temporary closure of Lionel Road South to through traffic may be necessary for approximately ½ an hour before and after games when crowds are at their greatest. Lionel Road South provides access to A4/M4, especially for A205 South Circular traffic over Kew Bridge; its closure will increase traffic using the heavily congested Chiswick Roundabout. With the addition of rugby such closures would occur practically every weekend during the 9-month football/rugby season.

(iii) Noise

9.320 LP policy 7.14 seeks to minimise noise pollution. During football matches there would be likely to be some occasional crowd noise (cheering etc) and from the PA system that could be heard outside the stadium including at neighbouring residential areas and major outdoor spaces. This noise would be intermittent and would take place only on match-days (up to 26-28 days per year).

... **Conditions limiting the use and number of events** are proposed to minimise impacts. Therefore, this is not considered to be unduly harmful to the usability of outdoor spaces near the ground or the living conditions of residents in the locality.). If share with London Irish this would increase to 42-50 days per year – mainly at weekends when other outdoor spaces are used and/or when local residents are enjoying leisure time at home. Need analysis of this negative impact.

3. Non-match days (pg 131)

9.326 **The stadium would be used on non-match days by BFC management and the associated community uses, these being the Learning Zone, offices of the BFC Community Sports Trust and the Interim Education Centre.** These operations would ensure activity on non-match days, the uses operating during normal business hours. They are not expected to have significant effects on the environment. **Increase in match days would reduce days (especially at weekends) when the stadium would be available for community uses. Need analysis (qualitative and quantitative) of this reduction in community benefit/social value of the stadium.**

9.327 Other possible non-match day uses for the stadium facilities include use of hospitality areas for functions and conferences in order to generate income for the club and make full use of the stadium. This use would be ancillary to the stadium's football use and would not be of a scale likely to generate excessive impacts on the environment noting there is some parking for the stadium on site. **Increase in match days would reduce the stadium availability for such income-generating uses. Need analysis/quantification of this dis-benefit/loss.**

2. Match days

9.338 **The total number of home matches scheduled to be played is 26-28** depending on cup progression, with the majority on Saturday afternoons (commencing at 3:00pm and ending at around 5:00pm. Around 4 home weekday games are usually scheduled (7:45pm to 9:45pm). Progression in cup competitions or postponement of fixtures, could lead to extra games being played on weekdays. **Addition of rugby will bring total match days to 42-50. The arrival/departure pattern of weekday fixtures is likely to be less spread out as people attend games after work. The arrivals are also likely to coincide with the end of the PM network peak when people are returning from work.** London Irish currently play occasional weekday matches on Friday evenings – when additional “weekend get-away” traffic/use of public transport can be expected.

9.344 **The impacts on nearby pedestrian routes will, despite management, be substantial for a temporary period,** but they are not so disruptive that day to day living in those areas is harmed to a significant degree as these conditions would only occur for the short period following the immediate discharge of crowds **on match days.** Given the short duration of the impact **and its intermittent occurrence,** and subject to appropriate management of surrounding streets through the LAMP in cooperation with the Police, to ensure people stay on designated routes and proceed safely, the disruption, is on balance considered acceptable, given positive impacts of the stadium. **Addition of rugby would mean many more match days with substantial negative**

impact on residential communities and local businesses and visitor attractions. Need analysis (qualitative and quantitative) of this additional dis-benefit.

(vii) Cumulative impacts (pg 141)

9.378 **Cumulative impacts from concurrent events at other nearby stadiums** such as Fulham, Queens Park Rangers (QPR) and Chelsea are not likely to be significant noting the **programming of football matches of neighbouring clubs is already considered by football authorities when compiling fixtures, and these matches are normally arranged for alternate weeks** (e.g. this season there is only one date Brentford and QPR play at home on the same day). If there was an occurrence that both Brentford and the other nearby clubs both played home matches on the same day, specific management measures for those fixtures would be programmed in advance and agreed with the Police, LB Hounslow, and interested parties, controlled by the Stadium Management Plan and secured as part of the S106. **Twickenham stadium is used for around 12 major rugby games over the football season some of which on Sundays, with most finishing by 4PM, ensuring that there would not be any regular clashes with fixtures at the proposed stadium.** Impacts from other uses on the site (housing and commercial) on match-days were considered and they do not significantly affect the reported match day impacts. **Addition of rugby would mean many more match days, including Sundays. This would seriously complicate programming to avoid clashes with both football and rugby.**

3. Match day mitigation

9.388 **Constraints that cause peak hour congestion at Gunnersbury Station are noted, however this is an existing situation. The impacts of the stadium fall largely outside those peak times and subject to appropriate management, those impacts are satisfactory.** The existing situation is already of serious concern to the Gunnersbury Station Action Team. A greater proportion of rugby spectators is expected to use Gunnersbury station. Residents and other local users are currently advised by TfL to avoid using the station during week-day commuter peak times. It will become necessary to extend this advice to weekend match-day peak times. Meanwhile, arrival for evening matches (football and rugby) will fall within commuter peak times. Therefore the applicant would not be expected to make any contribution to alleviate an existing deficiency not related to the proposed development. TfL has recommended mitigation in the form of securing the proposed Stadium Management Plan and its complement of plans and measures including the possible match-day CPZ, as well as reviewing the pedestrian network to identify if any improvements such as removing clutter or enlarged crossings can be made, though the applicant's survey of the pedestrian network did not identify any particular items needing improvement. **Any such measures will do nothing to resolve the issues at the station.**

4. Conclusion (match days)

9.389 The stadium is located in an area with relatively good public transport links, which will reduce the need for spectators to travel by car. Existing public transport modes (rail, underground and bus) have been assessed as having adequate capacity to cater for a crowd of 20,000, **though services will be very busy around match times, particularly evening games and post-match where numbers of people departing are more concentrated. Extensive management of crowd movements will be required through a LAMP as part of the Stadium Management Plan, with involvement from**

various authorities and transport providers This LAMP would also cover taxis, coaches, private hire vehicles and includes measures to minimise disruption of main pedestrian routes and disturbance of residential areas and to maintain access to public transport for non-spectators.

9.390 As the adjacent road network is congested and on-street parking demand in some areas is heavy, minimising car use is important to reduce adverse impacts on traffic and parking conditions. The Transport Assessment has modelled the expected private car use and on-street parking availability within a 1.8km radius of the stadium during scheduled match times. The assessment indicates that sufficient on-street parking spaces are available in this area for the expected number of car users, though to minimise impacts the club will endeavour to secure dedicated off-street parking (1,000 spaces) at nearby office sites where parking would not be needed when matches are played. If Brentford Football Club is able to make any such arrangements, would they be applicable to rugby matches organised by London Irish? The proposed Stadium Travel Plan will promote sustainable travel use and also monitor set targets. It is recommended a match day CPZ be consulted on with the aim of discouraging car use to the stadium, with its introduction linked to monitoring of predicted and actual private car usage and parking occupancy levels, and where these are exceeded then contributions agreed under s106 for consultation on a match-day CPZ within a 10 minute walk of the stadium would be triggered to further control traffic and parking impacts and maintain them at an acceptable level. Any such match-day CPZs would need to operate at times which are currently outside the local CPZ schemes (including many Saturdays or Sundays). Will affected residents be provided with a suitable number of visitor permits free-of-charge?

9.444 Impacts from the use of the stadium in respect of noise, traffic and lighting have been considered in more detail elsewhere. These impacts are not insignificant, and in particular the vehicular and pedestrian movements along main routes to the stadium generated by the stadium are likely to be harmful. However, this would be for limited periods, and, subject to the recommended mitigation provided by safeguarding conditions, which require details of operations, management and restrictions on uses, as well as the reserved matters which would provide final designs for the buildings, the adverse impacts are outweighed by the overall benefits of the proposal and on balance are acceptable. Removing the restrictions on use will increase the number of match days and hence the harm. There needs to be a robust analysis (qualitative and quantitative) of this increased harm to determine where the new balance lies.