

Hannah Connell,
Planning Officer,
London Borough of Richmond upon Thames,
Civic Centre,
44 York Street,
Twickenham TW1 3BZ.

22 October 2015

Dear Hannah,

Installation of temporary lighting to the roof, entrances and statue and erection of temporary facade signage and LED screens to support the Rugby World Cup 2015 matches to be held at Twickenham Stadium.

Consultation 15/3791/FUL

This response is submitted on behalf of the Friends of the River Crane Environment (“FORCE”). FORCE is an environmental and community charity, which was established in 2003 and now has some 530 members, many of whom are residents of the London Borough of Richmond upon Thames (“LBRuT”). FORCE has an interest in all activities and works throughout the lower Crane valley, including on the Duke of Northumberland River (“DNR”), onto which Twickenham Stadium has a 700-metre long frontage.

FORCE objects to the above application.

The Context of FORCE’s Objection

The DNR is an artificial watercourse built in the 1530’s to provide water power for mills and a water supply to Syon Priory. It is possibly the oldest man-made watercourse in the UK. It runs for four kilometres from the River Crane at Kneller Gardens to the River Thames in Isleworth, through both LBRuT and the London Borough of Hounslow (“LBH”).

Earlier in 2015, the DNR was the target for a successful competitive bid to the Greater London Authority’s Big Green Fund (“BGF2”). As a result, the DNR is now receiving £400 000 of public- and private-sector funding, with the active commitment of LBRuT, LBH, Thames Water and Harlequins FC, to secure environmental and public-access improvements which will greatly enhance the value of this asset to the local community.

Furthermore, the DNR is an important and sensitive ecological corridor in both LBRuT and LBH. In LBRuT, it is recognised as a “site of borough importance for nature conservation” and provides habitat for protected species such as water voles,

and a foraging route for kingfishers. In particular, it provides a “dark corridor” which supports several species of bat. The Steering Group for the BGF2 project commissioned a bat survey for the period May-July 2015, which found that six (possibly seven) different species of bat use the DNR corridor as a foraging area through the night. The report noted that “The northern section of the DNR [corresponding to the Twickenham Stadium frontage] suffers from anthropogenic disturbance of light, noise, dust and smell...The survey demonstrated the changing use over time by the bat community dependent on the demands of the breeding season and their synergy with insect swarming behaviour. It is just as important therefore to look after and encourage insects by imposing limits on pollutants such as dust, light, fumes and noise.”¹ This report has been sent separately to LBRuT planners.

Finally, LBRuT’s own planning policies set an essential test against which this application must be evaluated. LBRuT’s Core Strategy of April 2009 states that:

“CP12 River Crane Corridor:

12.A The Council will improve the strategic corridor to provide an attractive open space with improvements to the biodiversity. Developments in and adjacent to the River Crane Corridor will be expected to contribute to improving the environment and access, in line with planning guidance.”

The DNR is a key part of the River Crane corridor – as shown by its incorporation in the Crane valley catchment plan and its designation as a Site of Borough Importance for Nature Conservation. It is FORCE’s view that the developments which are the subject of this application do not contribute to improving the environment or access along the DNR.

Accordingly, in this context of public and private investment in the DNR, the ecological sensitivity of the corridor and the authority of Council policies supportive of the DNR environment and access, FORCE objects to this application.

FORCE’s Objections to this Application

1 Timing of this Application

The application asserts that the proposed changes are being made “to support the Rugby World Cup 2015.” The final match of this tournament takes place on 31 October 2015. Yet the decision on the application is not due until 28 October 2015. This leaves the applicant two working days in which to make the proposed changes, before the final matches on 30 and 31 October.

FORCE would be very concerned if the applicant were to pre-empt the planning process by commencing works prior to approval of its application; or, worse, by completing the works and then retrospectively applying for approval, as has been the case with other changes which the applicant has made in support of this Rugby World Cup.

FORCE also objects to the continuation of the additional lighting until 30 November 2015, as sought in the application – although the covering letter specifies the end of the World Cup as 11 November. Since the final match of the tournament will take place on 31 October 2015, the continuation of additional lighting for a further month cannot be justified on the grounds of “support[ing] the Rugby World Cup 2015.”

2 Presentation of this Application

The application describes the installations as “*temporary lighting*” and “*temporary façade signage and LED screens*” (author’s emphasis). And the covering letter states that “All lighting and signage will be removed following the end of the Tournament.” The application also states that the illuminations will be static.

FORCE notes that the initially uploaded version of the Twickenham Façade Report contained reference to “Permanent LED screens,” in particular on the West Stand facing the DNR. FORCE is pleased to note that this reference does not appear in the amended Façade Report. Nevertheless, the amended Façade Report continues to show “LED Dynamic” displays on the West Stand facing the DNR, in contravention of the information on the application form.

FORCE objects to the application, and in particular would welcome reassurance that no permanent additional lighting facilities will be approved, whether static or dynamic.

3 Content of this Application

Twickenham Stadium is already a significant source of light pollution in the borough, on all four sides. This light pollution is particularly detrimental to the environment on the west side of the stadium abutting the DNR. In combination with the noise and air pollution generated by the stadium plant and machinery which is located on this west side of the stadium, the existing light pollution already causes significant degradation to the environment of the DNR.

The proposal will add significantly to the existing light pollution. It is not clear whether LBRuT has already approved the installations shown as “Current On Budget.” These, comprising crown lighting, LED screens and graphic soldier columns will already add to light pollution from the stadium. To the extent that these installations have not already been approved, FORCE objects to them.

The installations shown as “Enhancements” will significantly exacerbate the light pollution, particularly on the west side of the stadium. These “Enhancements” comprise feature lighting to the central section, LED soldier columns, LED dynamic and LED screens. FORCE objects to all of these enhancements, and objects in particular to the enhancements proposed for the west side of the stadium.

4. Impact of this Application

The stadium itself is a large and intrusive element within the landscape of the DNR corridor, an area of MOL and a designated Site of Borough Importance for Nature Conservation. In recent months and years the RFU has added to this intrusive element through the construction of new buildings and operations adjacent to the

western boundary with the DNR which emit noise, air and light pollution. A recent survey of bats in the corridor has identified these existing activities as being of significant detrimental impact to the wildlife value of the corridor, particularly for bats. We would add that the impact has also been detrimental to the community and access value of this corridor.

The proposal introduces additional light pollution into the wildlife and community corridor which FORCE considers to be unacceptable. Furthermore, the proposal does not acknowledge the presence and value of the corridor, still less consider the impact upon this corridor of the proposals. This is a basic failing of the application – and we are sorry to say indicative of a wider failing of the RFU in respect of its relationship with the DNR corridor.

5. Conclusion

FORCE has tried in vain over a number of years to engage the Rugby Football Union (“RFU”) in a constructive dialogue, to encourage the RFU to step up to its responsibilities as long-term custodian of a major frontage onto the DNR. FORCE takes this opportunity to reiterate its commitment to such a dialogue, with a view to helping the RFU make a positive and enduring contribution to the quality of the local environment and community.

Yours sincerely,

Gary Backler, Planning Director,
For and on behalf of FORCE

FOOTNOTE 1: “Bat Survey Report, Duke of Northumberland River (DNR) Kneller Gardens to Whitton Dene, L.B’s Richmond and Hounslow,” Alison Fure, Furesfen, August 2015, p2. Sent as a separate attachment