

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

Some key statements shown in red; MLR comment 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 total number of match days and therefore of 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 attractions.

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.

(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

9.337 The applicant has assessed the impact of a football matches in detail, based on the capacity of 20,000, and as such is a 'worst case' scenario. Data from the club's supporter records has been used to inform the assessment. However, there is no assessment of any other uses such as concerts or rugby, so any permission would be conditioned to allow only football use, as trip patterns and timings from other events would vary from that which has been assessed. It is noted further information in respect of transport was submitted in accordance with Regulation 22 of the EIA Regulations in response to queries from the Council and Transport for London (TfL).

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. Arrival for evening matches (football and rugby) will fall within 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.

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 any such arrangements are made by Brentford Football Club, 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 harm and alter the balance. Need analysis (qualitative and quantitative) of this increased harm..

9.467 Stadium noise would be able to be heard at surrounding residential properties, with this being from the crowd and PA system. This matter has been considered in more detail above, with impacts found to be acceptable for neighbours and other uses such as open spaces and Kew Gardens. Impacts from possibly rugby use and rock concerts have not been considered as they are not proposed with this application. They will now need to be considered in detail.