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Date 22 December 2016
Our ref 04929/14/NT/NM/13018730v3
Your ref 99/2400

Dear Sir/Madam

Wembley Stadium - Temporary Variation to Conditions 3 (Event Cap) and 33 (Temporary Traffic Management) attached to Planning Permission 99/2400

Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as updated) – Request for Brent Council's Opinion on the Scope of Supplementary Environmental Information

On behalf of our client, the Football Association ('the FA'), we request Brent Council's opinion on the scope of Supplementary Environmental Information to be submitted in conjunction with an application under Section 73 of the Town and Country Planning Act 1990 associated with the forthcoming temporary use of Wembley Stadium by Tottenham Hotspur Football Club (THFC) for the 2017/18 season. The request is made with reference to the Town and Country Planning (Environmental Impact Assessment ('EIA')) Regulations 2011 (as updated) and follows recent discussions with officers of your North Area Team on this matter.

As you are aware, THFC is proposing to use Wembley Stadium to host home games for the football season 2017/18 whilst ongoing works to redevelop their stadium at White Hart Lane are completed. The use of the stadium will necessitate a temporary adjustment of operating caps included as planning conditions 3 and 33 on the Wembley Stadium planning permission (23 August 2002) to allow up to 22 additional 'major sporting events' between 1 August 2017 and 31 May 2018.

The planning application for Wembley Stadium, submitted in November 1999, included the Wembley Stadium Environmental Statement ('ES') (1999) which had been prepared pursuant to the (then) Town and Country Planning (EIA) Regulations 1999. The scope of the ES covered the following matters:-

- 1 Effect on local communities;



- 2 Transportation;
- 3 Air quality;
- 4 Noise and vibration;
- 5 Hydrology, geology and ground conditions;
- 6 Ecology;
- 7 Archaeology;
- 8 Built heritage; and
- 9 Urban landscape.

The ES (1999) was carried out on the basis of an assumed level of usage at the stadium and reported on the baseline environmental conditions in the area in 1999. We agree with officers' view that timely consideration of the s73 application for temporary variation to the Stadium cap would benefit from relevant up to date additional environmental information on the key matters potentially affected by this temporary variation of the caps.

In terms of the scope of any additional environmental information required, we note that the proposal includes no new built development and, in our view, the following matters (which are largely guided by the form of development) do not require consideration as part of any Supplementary Environmental Information provided:-

- 1 Hydrology, geology and ground conditions;
- 2 Ecology;
- 3 Archaeology;
- 4 Built heritage; and
- 5 Urban landscape.

However, it is considered that the temporary additional activity associated with the additional events at the stadium may give rise to effects in respect of the following matters:-

- 1 Effect on local communities (socio-economic matters);
- 2 Transportation;
- 3 Air quality; and
- 4 Noise and vibration.

We would appreciate it if you would confirm that you agree that these four matters should form the basis of the Supplementary Environmental Information to be submitted alongside the s73 application at your earliest convenience. The document will provide a commentary on the up to date baseline position in respect of each matter and a consideration of whether the temporary variation to the stadium cap may give rise to any significant effects. We will then compare this to the conclusions reached in the Wembley Stadium ES (1999). The assessment will be carried out with regard to the EIA Regulations 2011 (as updated).

In respect of the baseline data described in the Wembley Stadium ES (1999), we note that this largely dates from between 1996 and 1999. However, the significant redevelopment within the area immediately adjacent to the stadium over the last ten years means that a significant level of



up to date baseline data for the area exists from planning application submissions (including several Environmental Statements) made to Brent Council during this period. We propose to draw from this library of information to inform the update to the baseline position in the area alongside evidence available to the FA's team at this time. To assist in this process, we would appreciate it if the Council could provide access to any documentation which it holds. We will contact David Glover to discuss this matter further.

We would appreciate it if you could provide written confirmation that you agree with our suggested approach to addressing this matter as soon as possible pending submission of the s73 application in January 2017.

Thank you in advance for your assistance. Please contact Nick Thompson, Nick Baker or myself if you require any further information or wish to discuss this further.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nicki Mableson'.

Nicki Mableson
Planning and EIA Director