ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCREENING REPORT

ALLIANZ STADIUM, TWICKENHAM
EVENT PLANNING APPLICATION

RUGBY FOOTBALL UNION | MAY 2025

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Revision History

Revision	Date	Prepared by	Reviewed by	Amendment
1	24/03/2025	Chloe Patel	Andrew Malcomson	First draft
2	16/04/2025	Chloe Patel	Andrew Malcomson	Second draft
3	29/04/2025	Chloe Patel	Andrew Malcomson	Final draft
4	02/05/2025	Chloe Patel	Andrew Malcomson	Final issue

1. INTRODUCTION

1.1 Turley is acting on behalf of Rugby Football Union (the 'Applicant') who are preparing to submit a planning application to increase the number of major non-sporting event days (the 'Proposed Scheme') at Allianz Stadium, Twickenham (the 'Site'). The Site is defined on **Figure 1**.

1.2 This Environmental Impact Assessment (EIA) Screening Report has been prepared in order to obtain an EIA Screening Opinion from London Borough of Richmond upon Thames (the LBRuT) in accordance with Part 2 of The Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[1] (the 'EIA Regulations').

1.3 In accordance with Regulation 6, Paragraph 2 of the EIA Regulations, this report includes the following information:

- A plan sufficient to identify the land (see **Figure 1**);
- A description of the location of the development, including in particular;
  - A high level description of the physical characteristics of the development and, where relevant, of demolition works (set out within **Section 2**);
  - A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (see **Section 3**);
- A description of the aspects of the environment likely to be significantly affected by the development (set out within **Section 6**);
- To the extent of the information is available, a description of any likely significant effects of the development on the environment resulting from;
  - The expected residues and emissions and the production of waste, where relevant (see **Section 6**);
  - The use of natural resource, in particular soil, land, water, and biodiversity (see **Section 6**); and
- Such other information or representations as the person making the request may wish to provide or make, including any features of the development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment (see **Section 6**).

1.4 Furthermore, this report has been prepared in line with Regulation 6, Paragraph 4 (including criteria set out in Schedule 3) of the EIA Regulations and covered the following steps:

[1] The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). SI No. 571.

Identification of the characteristics of the development (**Section 2**)

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Identification of the characteristics of the Site and surrounds (**Section 3**)

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Taking into account the characteristics of the development and the Site and surrounds, identification of how Schedule 1 or 2 of the EIA Regulations applies (**Section 4**)

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An explanation of how the Proposed Scheme has been appraised within this report and how this report sets out the consideration of likely environmental effects and in-combination effects (**Section 5**)

↓

An appraisal of whether there will be any likely environmental effects, including the identification of any plain or easily achievable mitigation to avoid significant effects (**Section 6**)

↓

An appraisal of whether there will be any likely in-combination effects (**Section 7**)

1.5 As such, the information provided within this report is considered sufficient to inform the LBRuT's Screening Opinion, in accordance with Regulation 6, Paragraph 2 of the EIA Regulations.

2. CHARACTERISTICS OF THE PROPOSED SCHEME

BOUNDARY

1.6 All temporary and permanent works will take place within the boundary shown on **Figure 1: EIA Boundary,** hereafter referred to as the 'Site'.

SCHEME PRINCIPLES

1.7 The Proposed Scheme is to increase the number of major non-sporting event days at Allianz Stadium from the existing 3 per annum to 15 per annum (to be grouped, see 'Timescales' below). A major non-sporting event will include set up days (up to five days[2]) for the erection and provision of equipment and infrastructure; activities (e.g. music, shows and rehearsals) within the bowl of the stadium; and take down days (up to three days[3]) for the dismantle and removal of equipment and infrastructure following the event. The capacity for these major non-sporting event days is proposed to be increased from 55,000 to 75,000.

1.8 The timings for the major non-sporting events would remain as existing, which is a finish time of 22:30. There will be an added provision to allow for irregular extension of up to 10 minutes as required (exceptional circumstances).

1.9 The maximum number of consecutive events would be up to 4 consecutive nights.

[2] This is as per the existing arrangements for major non-sporting events.
[3] As above.

1.10 During the major non-sporting events, in line with current arrangements, any promoters compound (including car parking / drop off and pick up areas) will be within the Site boundary. Arrival and departure of the heavy vehicles carrying rigs will be via Rugby Road to the north of the stadium.

1.11 An Event Management Plan will be in place that will include:

- Preferred routes for arrival and departure of heavy vehicles;
- Timing of arrival and departure of heavy vehicles;
- Timing of rigging and de-rigging activity outside the stadium bowl but within the Site perimeter;
- Crowd management procedures;

1.12 A Noise Management Plan for major non-sport events will be in place that will include:

- Procedures for the monitoring of music noise from concerts;
- Determining noise monitoring locations representative of community impacts; and
- Description of how members of the public can make complaints and how these will be responded to on the day of the major non-sport event.

1.13 A package of transport interventions are being developed to improve and optimise the existing transport management and support the application. This package will benefit the management of all events at Twickenham, not just the additional major non-sport events. At a high level, the package includes an enhanced digital and ticketing strategy, optimisation of pre-match road closures and traffic management, a review of Twickenham Station operations, improved management of the A316 crossing, a refined wayfinding strategy, promotion of additional rail stations, enhanced shuttle bus management, improved taxi and private hire vehicle (PHV) strategies, and improved event-day on-site travel information.

TIMESCALES

1.14 There will be a staggered introduction up to the maximum number of major non-sport events, as follows:

- 2026 – 6 major non-sporting days with no more than 4 separate events and 1 event outside of summer months[4];
- 2027 – 12 major non-sporting days with no more than 6 separate events and 2 events outside of summer months; and
- 2028 – 15 major non-sporting days with no more than 8 separate events and 3 events outside of summer months.

1.15 There will be no more than 4 consecutive major non-sporting event days in any two-week period across all years.

3. CHARACTERISTICS OF THE SITE AND SURROUNDING AREA

LOCATION AND USE

1.16 The 'Site' comprises the existing and operational Allianz Stadium located within the LBRuT. The Site is bound to the north by Whitton Dene (with Mogden Sewage Works further to the north), to the east by Rugby Road,

[4] Summer months are defined as May – September.

to the south by Whitton Road and to the west by the Duke of Northumberland River with Chase Bridge School and the Cardinal Vaughan Playing Fields on the opposite side of the river. Whilst the Stadium is located within the LBRuT. The opposite side of Whitton Dene and Rugby Road fall within the London Borough of Hounslow (the LBH). The surrounding area to the Site is characterised by commercial uses, with low rise residential areas present to the north-east and south of the Site.

1.17 Currently Allianz Stadium has permission for an unrestricted number of sport events throughout the year at a capacity of 82,000, and three non-sport events (concerts) a year at a capacity of 55,000.

1.18 To control the traffic from the existing events, Allianz Stadium has a proven and robust event-day transport strategy which was developed in coordination with local authorities and transport operators. This implements measures such as temporary road closures, Restricted Zones on event days (triggered by crowds of >30,000 attending events at Allianz Stadium), stewarding, traffic management, shuttle bus services, and enhanced public transport operations.

SUMMARY OF KEY CHARACTERISTICS OF THE SITE AND SURROUNDING AREA

1.19 **Table 3.1** provides a summary of the key characteristics of the Site and surrounding area and any notable sensitive receptors on a technical topic by topic basis. The majority of the receptors identified in **Table 3.1** are unlikely to be affected by the Proposed Scheme. This is further explained in the appraisal in **Chapter 6**.

Table 3.1: Summary of Key Characteristics of the Site and Surrounding Area

Technical topic	Summary
Transport and Access	• Whitton Road / B361 is located along the southern boundary connecting to Chertsey Road / A316 further south. The A316 provides connections to other areas in London to the east. • Rugby Road is located along the eastern boundary which connects to Whitton Dene to the north. • Twickenham train station is approximately 850m south-east of the Site. • Bus stops are located nearby, along Whitton Road to the south, with bus services including Tolworth and Hammersmith. • There are no Public Rights of Way within/near the Site.
Air Quality	• The Site is located within the Richmond Air Quality Management Area (AQMA) which was declared by the LBRuT for exceedances of the annual mean nitrogen dioxide (NO_2) air quality objective. Albeit the AQMA designated is borough-wide, and specific and recent data as set out below demonstrates air quality is good in the area. • Monitoring undertaken by the LBRuT and London Borough of Hounslow (LBH) demonstrates that the annual mean NO2 objective of 40µg.m-3 was not exceeded at any monitoring locations near the Site since 2021. A number of monitoring locations recorded exceedances of the objective prior to 2021 however, the data demonstrate a strong downward trend in concentrations indicating that air quality in the vicinity of the Site has improved significantly over the past seven years.

Technical topic	Summary
	• Since 2018, not one hour of any calendar year has recorded concentrations of the 1-hour mean objective for NO2 greater than 200µg.m-3 at any analyser operated by the LBRuT or LBH[5]. • The annual and daily mean PM10, and the annual mean PM2.5 objectives were met at all automatic analysers in all years in the LBRuT and LBH for which data were available for review[6].
Noise and Vibration	• The wider area around the Site comprises the residential areas of Twickenham, Isleworth and Hounslow. • Nearby noise sensitive receptors include (but are not limited to) residential properties located along Varsity Drive to the east; Whitton Road; Palmerston Road; Chudleigh Road; Tayben Ave; and Talma Gardens to the south, and along Harlequin Close and Whitton Dene to the north.
Biodiversity	• The nearest statutory designated sites are as follows: – Syon Park Site of Special Scientific Interest (SSSI), located 2.3km north-east; – The Richmond Park National Nature Reserve (NNR), Special Areas of Conservation (SAC), and SSSI, is located 2.8km east; – Bushy Park and Home Park SSSI, located 3.1km south; and – The Kempton Park Reserves SSSI and Local Nature Reserves (LNR), and the South West London Waterbodies SPA and Ramsar is located approximately 4.5km south-west of the Site. • The closest Local Nature Reserve (LNR) to the Site is the Ham Lands LNR, 1.5km south-east. • Habitats on Site primarily comprise of hardstanding/building (i.e. the stadium), with some trees.

[5] Up to 18 hours are permitted per year to exceed concentrations of 200µg.m^{-3}. Monitoring for this objective is undertaken using automatic analysers, none of which are located close to the Site. The analysers are located in areas experiencing greater volumes of traffic and therefore higher levels of pollution relative to those experienced near the Site. It is therefore considered that 1-hour mean NO_2 concentrations near the Site would be lower than those recorded at the analysers, and the 1-hour mean NO_2 objective is also achieved at the Site and the surrounding area.

[6] No analysers recording PM_{10} or $PM_{2.5}$ concentrations are located near the Site. Given that the analysers in the LBRuT and LBH are located in areas experiencing greater exposure to pollutant sources than the area around the Site, it is considered that PM_{10} and $PM_{2.5}$ concentrations around the Site would be lower than those at the analysers, and therefore also compliant with the relevant air quality objectives.

Technical topic	Summary
Built Heritage and Archaeology	• No conservation areas are located within/adjacent to the Site. The closest is the Rosecroft Gardens Whitton conservation area approximately 380m south west of the Site. • No scheduled monuments are located nearby (the closest being over 1km away). • There are no listed buildings within or adjacent to the Site. Several Listed Buildings are located in the wider surrounding area, the closest being: – Church of All Hallows, a Grade I listed building located approximately 350m south-east of the Site; – Kneller Hall And Boundary Walls Royal Military School Of Music, a Grade II listed building located 520m west of the Site; and – Gatepiers To Royal Military School Of Music, located 545m west of the Site. • The Royal Botanical Gardens, Kew World Heritage Site is located approximately 1.5km north east. • The Site is currently developed and comprises hardstanding, suggesting any archaeological remains that may have previously present have been truncated.
Townscape/Landscape and Visual	• The Site is located within the 115 Thames Valley National Character Area (NCA)[7]. • The Site is not located within or near a protected vista in London.
Water Environment and Flood Risk	• The Duke of Northumberland's River, an Environmental Agency Main River, is located adjacent to the Site boundary to the west. Additionally, a tributary from the River Crane is located to the east (just beyond Rugby Road) and passes through the Site culverted. • The Site is located within Flood Zone 2 (a medium probability of flooding). • The Site largely has a 1 in 100 to 1 in 1000 annual likelihood of surface water flooding, with some limited areas around the edges of the stadium within a 1 in 30 likelihood.
Ground Conditions and Contamination	• There are no potentially contaminating uses on Site currently. • The potential for Radon within the Site is low, with less than 1% of homes being at or above the Action Level.

[7] The NCA Profile 115 notes that this '*provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings..'* Available at: https://publications.naturalengland.org.uk/publication/3865943

Technical topic	Summary
	• The Site is at very low risk of UXO.
Artificial Lighting	• Existing lighting installations are on Site to enable the use as a sport stadium (i.e. lighting onto the pitch and in the stands; and street lighting for the public areas surrounding the stadium). The surrounding road network includes street lamps. • The Environmental Zone of the Site is likely to be E38, which reflects the suburban area with a medium district brightness.
Major Accidents and/or Disasters	• The Site is not within a zone on which the Health and Safety Executive would need to be consulted. • The nearest COMAH establishment is the Mogden sewage treatment works which is a lower tier establishment.

4. SCHEDULE OF THE PROPOSED SCHEME

1.20 In line with the EIA Regulations, the Proposed Scheme has been appraised against the development descriptions contained within Schedule 1 and Schedule 2.

1.21 Based on the characteristics of the Proposed Scheme (**Section 2**), it is not considered that the Proposed Scheme would constitute Schedule 1 development.

1.22 As established in **Section 3**, the Site is not located within a 'Sensitive Area'[9], within the meaning of the EIA Regulations. The thresholds set out within Schedule 2 should therefore be considered.

1.23 The project could be considered to fall within Schedule 2 13 (b) – Changes and extensions of the EIA Regulations in that it is proposed to change a Schedule 2 10 (b) – Urban development project (i.e. the existing Allianz Stadium).

1.24 As outlined within the EIA Regulations and Planning Practice Guidance (PPG), the exceedance of the threshold/criteria does not automatically determine that the Proposed Scheme is 'EIA Development', but rather that the "*…proposal needs to be screened by the local planning authority to determine whether significant effects on the environment are likely and hence whether an Environmental Impact Assessment is required*"[10].

1.25 The selection criteria for Schedule 2 development are detailed within Schedule 3 of the EIA Regulations and are as follows:

- Characteristics of development;
- Location of development; and
- Types of characteristics of the potential impact.

[8] Institution of Lighting Professionals (2021). Guidance Note 01/21: The Reduction of Obtrusive Light.
[9] Sites of Special Scientific Interest (SSSI), European Sites (i.e. Special Areas of Conservation (SAC), Special Protection Areas (SPA), Ramsar); National Parks, the Broads, Areas of Outstanding Natural Beauty; World Heritage Sites and Scheduled Monuments.
[10] Planning Practice Guidance Paragraph: 017 Reference ID: 4-017-20170728.

1.26 The characteristics of the Proposed Scheme were set out in **Section 2** and the location of the Site in **Section 3**. The following sections consider the types and characteristics of the potential impact, termed as an appraisal of likely environmental effects.

5. APPROACH

APPRAISAL OF LIKELY ENVIRONMENTAL EFFECTS

1.27 The appraisal of likely environmental effects, set out within **Section 6**, has been based on baseline information presented within **Section 3** and has considered likely environmental effects arising from the Proposed Scheme, as detailed within **Section 2**. The appraisal has focused on environmental effects and whether any of these are considered '*likely*' and '*significant*' at receptors.

1.28 In accordance with Regulation 4, Paragraph 2 (and expanded on in Schedule 4, Paragraph 4) of the EIA Regulations, the following environmental 'factors' have been considered:

- Population and human health;
- Biodiversity;
- Land, soil, water, air and climate;
- Material assets, cultural heritage and the landscape; and
- The interaction between the above factors.

MITIGATION

1.29 Regulation 6, Paragraph 2(e) allows for the discussion and identification of project specific measures to avoid and/or prevent significant adverse environmental effects, specifically stating;

> *"A person making a request for a screening opinion in relation to development where an application for planning permission has been or is proposed to be submitted must provide the following-…*
>
> *…(e) such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment*".

1.30 As part of this appraisal, mitigation measures have only been considered if they are specific, easily achievable and if there is a high degree of confidence in their effectiveness and implementation. Mitigation is set out in **Chapter 2** and referred to in **Chapter 6** where relevant.

APPRAISAL OF IN-COMBINATION EFFECTS

1.31 In line with Schedule 3 of the EIA Regulations, the "*cumulation of the impact with the impact of other existing and/or approved development"* has also been taken into consideration and is set out in **Section 7**.

1.32 This is further supported in PPG[11], which states:

> *"Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in*

[11] Paragraph: 024 Reference ID: 4-024-20170728.

determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development".

1.33 To identify '*existing and/or approved development*' ('Cumulative Projects') for consideration of in-combination effects with the Proposed Scheme, a review of the LBRuT and the neighbouring London Borough of Hounslow (LBH) planning portals[12, 13], Nationally Significant Infrastructure Project (NSIP) register[14], Transport and Works Order Act application register[15] and Parliament Hybrid Bill registers[16] has been undertaken.

1.34 This review took into consideration the geographical extent and temporal scope of the effects associated with the Proposed Scheme and those from Cumulative Projects to determine whether in-combination effects are likely and warrant consideration as part of this report. The search has been based on the following criteria:

- Applications submitted within the last 5 years[17];
- Projects within 1km of the Site;
- Applications with a resolution to grant planning permission;
- Approved applications either under construction or not yet implemented; and
- Projects of a relevant scale (e.g. NSIPs, Schedule 1 and 2 development[18]).

1.35 Projects identified which met these criteria have been considered against the following points (where sufficient information allows):

- Is there or is there likely to be a concurrent construction or operational stage with the Proposed Scheme?
- Is there potential that the Proposed Scheme shares common sensitive receptors with the identified Cumulative Projects?

1.36 The list of Cumulative Projects identified for appraisal is outlined in **Section 7**.

1.37 At present, there is no widely accepted methodology or best practice for the assessment of cumulative effects (especially at the EIA Screening stage). Therefore, in order to determine the likelihood of possible in-combination effects, a high-level appraisal has been completed (informed by the questions above), the results of which is set out in **Section 7**.

[12] https://www.richmond.gov.uk/services/planning

[13] https://planningandbuilding.hounslow.gov.uk/NECSWS/ES/Presentation/Planning/OnlinePlanning/OnlinePlanningSearch

[14] https://infrastructure.planninginspectorate.gov.uk/projects/

[15] https://www.gov.uk/government/collections/twa-inspector-reports-and-decision-letters

[16] https://www.parliament.uk/business/bills-and-legislation/current-bills/hybrid-bills/

[17] It is assumed applications submitted prior to this has been built out and operational.

[18] Informed by the definition of major development by NPPF; the definition of Schedule 1 and Schedule 2 developments set out within the EIA Regulations; and developments that do not fall into the above but have notable implications due to location or scale.

6. APPRAISAL OF ENVIRONMENTAL EFFECTS

CONSTRUCTION STAGE

1.38 No physical works are required to Allianz Stadium in order to accommodate the increase in major non-sporting event days, therefore no construction is proposed. The exception to this is minimal works within the stadium bowl and any works required to implement the transport interventions, which are subject to refinements and agreement with the LBRuT. Any such interventions will result in very limited disturbance due to the scale and nature of the interventions proposed (e.g. signage to improve wayfinding).

1.39 In light of the above, there will be no significant construction stage effects.

OPERATIONAL STAGE

1.40 Due to the nature of the Proposed Scheme, there will not be any new massing or increased/changed quantum of floorspace/development on Site. Therefore, operational effects will be limited to those associated with the activities relating to the major non-sporting events, including the music from concerts and traffic of people arriving and departing the Site. These effects are considered further below under 'Traffic and Access'; and 'Noise and Vibration'.

1.41 For completeness, **Table 6.1** sets out a short rationale as to why other environmental topics are not considered to be significant.

Table 1.1: Environmental Topics Not Considered Further (Operation)

Topic	Rationale
Biodiversity	No habitat removal or alterations are proposed. The Proposed Scheme will be implemented at the established Allianz Stadium, which already hosts major non-sporting events. There will be no change to the baseline. The Site will continue to be hardstanding and drain by existing mechanisms so there will be no effect on the nearby designated sites. Overall, there will be no significant effects to biodiversity.
Water Environment	No physical works are proposed and therefore the flood risk of the Site and surrounding area will not be changed by the Proposed Scheme. No potentially polluting uses are proposed that would affect the quality of the adjacent watercourses. Overall, there will be no significant effects to the water environment.
Ground Conditions and Contamination	No physical works are proposed, and therefore the ground will remain as per the existing baseline. Overall, there will be no significant effects to ground conditions or archaeology.
Archaeology	
Built Heritage	No additional massing is proposed that would change the setting of any built heritage assets (the surrounding listed buildings and conservation areas); change the townscape character area; or change the visual amenity for surrounding receptors.
Townscape and Visual	

Topic	Rationale
	Whilst the number of major non-sporting event days would increase, thus increasing the frequency of activity on Site (which could influence visual amenity), this would be in a similar manner to the events which already occur. Furthermore, activity on Site would be temporary, over a maximum number of four consecutive event days (up to the total 15 across the year). Overall, there will be no significant built heritage or townscape and visual effects.
Artificial Lighting	No new permanent lighting installations are proposed. Lighting arrangements will be as per the existing regime for sporting events and the three permitted non-sporting event days. Additional temporary lighting may be required during the non-sporting events (including event lighting in the stadium bowl and for wayfinding / public concourse areas outside the stadium bowl), however this will be temporary to the event day and duration (i.e. up to a total of 15 days throughout the year). Overall, effects of artificial lighting will not be significant.
Climate Change	The increase in the use of the stadium for non-sporting event days would result in only a small uplift in greenhouse gas emissions. Overall, there will be no significant effects associated with climate change.
Socio-Economics and Human Health	The increase in the number of non-sporting event days would result in an increase to economic productivity (e.g. from sales and spending in the local area) and creation of additional jobs associated with operation of the stadium. Whilst a beneficial effect, in the context of Allianz Stadium already operating events, the increase in economic productivity would not be significant. Where relevant, the human health effects related to the increase in traffic and noise are considered under 'Traffic and Access'; 'Noise and Vibration'; and 'Air Quality' below. Overall, there will be no significant socio-economic and human health effects.
Major Accidents and/or Disasters	Sporting events are permitted at Allianz Stadium throughout the year, as well as three major non-sporting event days, all of which already have the correct procedures in place to ensure safety and are not considered to be at risk from the nearby Mogden sewage treatment works. The risk of major accidents and/or disasters will be controlled as per the current regime to avoid significant effects.

Topic	Rationale
Waste	Whilst the number of major non-sporting event days will increase, any waste associated with this will be managed in accordance with the current regime at Allianz Stadium. Overall, there will be no significant waste effects.

1.42 As set out above, detailed consideration has been given to the following topics to appraise the potential for likely significant effects.

Traffic and Access

Changes to traffic flows on the local road network as a result of operational traffic, and disturbance to travel infrastructure

1.43 The Proposed Scheme will increase the number of major non-sporting event days from three a year to up to 15 a year at Allianz Stadium, and increase the capacity of these events from 55,000 to 75,000.

1.44 The trip generation, congestion levels and overall transport impact of a non-sporting event is likely to be less or equal to a full capacity sporting event (which operate at a higher 82,000) because:

- Existing data from previous concerts at Allianz Stadium shows that concerts attract a lower portion of car users when compared to existing rugby events. This is likely due to different audience profiles and a greater convenience using public transport;
- Unlike rugby matches, which have a concentrated peak arrival time shortly before kick-off, concert arrivals are more evenly spread out due to supporting acts and flexible entry times. This results in a flatter arrival profile, easing the strain on the transport network and avoiding sharp congestion peaks seen with rugby events; and
- Concert departures are more concentrated compared to rugby events, as there are fewer opportunities to retain attendees on-site post-event. However, concerts typically finish later in the evening, when the local road and public transport network is quieter. Whilst the departure peak is more pronounced, it should have a shorter dispersal period (as it is not prolonged), with the network returning to normal sooner than after a rugby event.

1.45 In addition to the above, background traffic on event days reduces due to pre-event warning signs and public awareness.

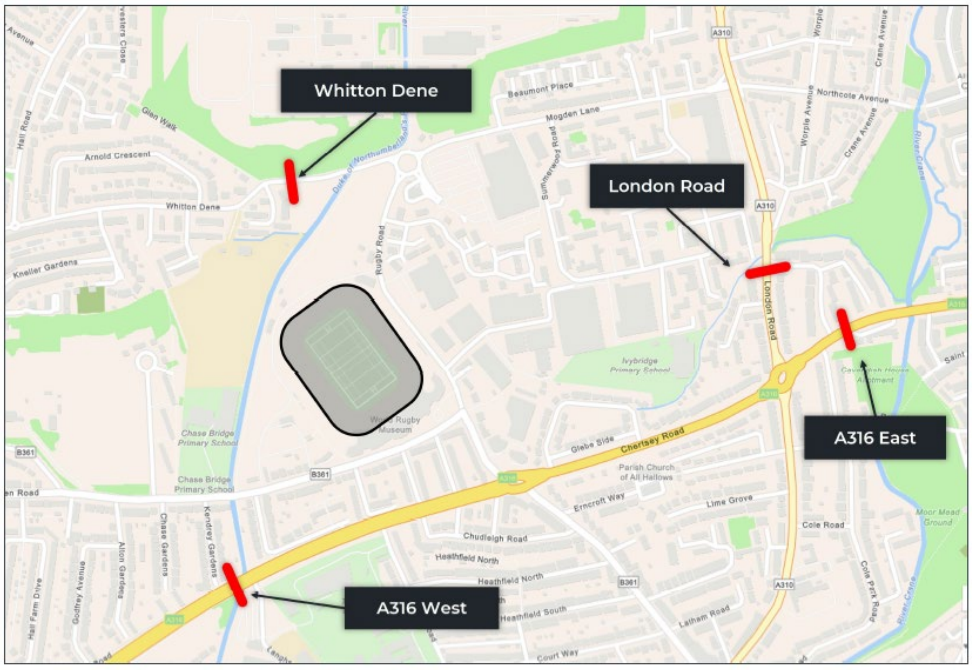
1.46 Existing traffic management measures which are already in place for full-capacity sporting events (see **Section 3**) will continue to be applied effectively for the proposed additional non-sporting events. In addition to the existing transport measures, a suite of further transport interventions are proposed, as set out in **Chapter 2**. These will improve and optimise the existing transport management and support the planning application. The measures will also ensure that spectator movements are safely coordinated, with appropriate stewarding, designated walking routes, and well-established public transport links. The Proposed Scheme will not introduce new road safety risks or severance effects beyond what is already managed for larger-capacity sporting events.

1.47 **Extract 1** provides an initial high-level review of the impact on local roads resulting from non-sporting events (a concert), compared to existing concerts and a rugby game. This has been undertaken by the Applicants

highways consultant WSP. The events are all at the capacities set out above. The baseline traffic flows are based on existing DfT traffic counts in the local area and a first principles distribution assessment. As concerts typically generate lower vehicle demand than rugby events, all links show a reduction in traffic flow when comparing the proposed concert to existing rugby events. More importantly, while the comparison between existing concerts and the proposed concerts does indicate an increase in traffic, this remains below a 10% increase[19] relative to the existing concert.

Extract 1: Vehicle Flows and Impact

Link	Baseline Flows (two-way AADT)	Existing Concert		Existing Rugby		Proposed Concert		Net Change	
		Veh	Baseline + Event	Veh	Baseline + Event	Veh	Baseline + Event	Concert (Existing vs Proposed)	Rugby vs Proposed Concert
A316 (West)	45,920	4,920	50,840	9,059	54,979	6,708	52,628	+3.5%	-4.3%
A316 (East)	43,078	7,620	50,698	14,033	57,111	10,392	53,470	+5.5%	-6.4%
London Road	20,493	1,847	22,340	4,311	24,804	2,188	22,681	+1.5%	-8.6%
Whitton Dene	11,449	1,193	12,642	2,783	14,232	1,412	12,861	+1.7%	-9.6%



1.48 Overall, Allianz Stadium operates within a controlled event framework, where transport mitigation strategies have been tested and refined over time to accommodate peak demand. The additional events will not introduce a step change in travel patterns or require new transport infrastructure beyond existing provisions. Therefore, changes to traffic flows on the local road network as a result of operational traffic and disturbance to travel infrastructure is not considered to be significant.

Noise and Vibration

Changes to the noise environment as a result of rigging and de-rigging within Allianz Stadium

1.49 Noise from rigging and de-rigging of staging, lights and PA etc. associated with major non-sport events within the Allianz Stadium will be substantially screened from nearby sensitive receptors by the structure of the

[19] This is a general rule used by IEMA guidance to establish if further assessment is required. The 10% threshold is not exceeded.

stadium. Arrival and departure of heavy vehicles carrying rigs will be routed via the north car park to avoid the majority of residential receptors to the south of the Site. Measures to control noise from rigging and de-rigging will be managed through the Environmental Management Plan as set out in **Chapter 2**.

1.50 Overall, the noise from rigging and de-rigging activities associated with the Proposed Scheme is not considered to be significant.

Changes to the noise environment as a result of traffic generated by the Proposed Scheme

1.51 A 20% reduction in traffic flow or 25% increase in traffic flow is required for a 1 decibel change in traffic noise level. This is rated by the DMRB[20] as a negligible to minor impact in the short term which would not be significant. Given the rationale above under 'Traffic and Access' (i.e. trip generation, congestion levels and overall transport impact of a non-sporting event likely to be less or equal to a full capacity sporting event) any effect will be short term and not significant. Contextualised, an increase of traffic flows in the vicinity of Allianz Stadium from the non-sporting events compared to the previous non-sporting event day capacity will not increase traffic flows by more than 25%, as set out in **Extract 1** (nor is there a decrease of 20% when compared to a rugby event). Therefore the noise will not be significantly worse than existing events, the frequency of these will just increase.

1.52 Overall, changes to the noise environment as a result of traffic from the Proposed Scheme is not considered to be significant.

Changes to the noise environment as a result of crowd noise

1.53 As set out in **Chapter 3**, large crowds already arrive and depart from Allianz Stadium for sporting events without significant adverse noise effects. Whilst the crowds from the additional non-sporting events will depart later in the evening than most sporting events, the crowds will be smaller (7,000 less people) and the duration of crowd dispersal shorted. Crowd management procedures will be set out in the Event Management Plan (as per current arrangement for events), as set out in **Chapter 2**.

1.54 Overall, the noise from crowds arriving/departing non-sporting event days is not considered to be significant.

Changes to the noise environment as a result of music noise

1.55 Whilst the increase in non-sporting event days will result in additional days throughout the year where there will be music noise from concerts, the stadium is now a contiguous bowl which effectively contains noise within it and substantially reduces the breakout of noise. This is an improved position from when concerts were first permitted at Allianz Stadium when the bowl was more open and 'leaked' considerable more noise. Consequently, the noise levels from non-sporting events at the nearest receptors i.e. the most affected, are currently (and will be) below the limits on the existing planning permission and premises licence.

1.56 Planning Practice Guidance includes the long-established principle that for non-continuous sources of noise (such as concerts at the stadium) the number of noise events, and the frequency and pattern of occurrence of the noise are important factors in assessing the impact. The proposal for non-sporting events at the stadium is for the grouping of small number events (as set out in **Chapter 2**) so that impacts are confined to defined periods separated by episodes of respite, rather than drawn out over a much longer period i.e. the concentration of events over a shorter cycle rather than the extending of events over much longer period.

1.57 In addition to the above, music concerts are not permanent, are transient and any adverse noise impacts will reverse as soon as the event is over. Whilst the Proposed Scheme is to increase the number of non-sporting

[20] LA 111 revision 2 Noise and vibration-web.pdf

event days, they will still only occur for a small minority of the year and for the substantial majority of the year there will be no music concerts at the stadium.

1.58 As set out in **Chapter 2**, a Noise Management Plan will be in place for non-sporting events which control music noise effects.

1.59 Overall, change to the noise environment from music noise is not considered to be significant.

Air Quality

Changes in air quality pollutant concentrations due to exhaust emissions from traffic generated by the Proposed Scheme

1.60 Existing air quality in the area is good, with background concentrations below objectives, as set out in **Chapter 3**.

1.61 As set out under 'Traffic and Access', capacity for non-sporting event days will be lower than for existing sporting events; traffic levels reduce on event days due to non-attendees avoiding the area during event times or choosing to retime or not travel during events; and non-sporting events generate lower traffic levels than sporting events. This reduction in traffic around events represents a benefit to local air quality through reduced road traffic emissions.

1.62 The traffic mitigation measures (existing and proposed, as set out in **Chapter 3** and **Chapter 2** respectively) also represent a benefit to local air quality through not only minimising the impact of the proposed additional non-sporting event days, but also reducing the existing impact of the consented sporting and non-sporting events at Allianz Stadium.

1.63 Given the above, it is considered highly unlikely that the Proposed Scheme would give rise to an increase in local pollutant levels such that there would be a significant effect.

7. IN-COMBINATION EFFECT APPRAISAL

1.64 In line with the methodology set out within **Section 5**, 4 Cumulative Projects (listed in **Table 7.1**) are considered to meet the selection criteria for in-combination effects.

Table 1.2: Cumulative Projects Identified for Appraisal

Ref.	Application Number/Council ref/Location/Description	Status	Distance/Direction from Site	EIA/Not EIA
1	P/2019/3339 (LBH) 30 Rugby Road, Twickenham, TW1 1DG Demolition of existing buildings and redevelopment of the site to mixed use Class B8 (self-storage), Class B1 (office) and Class C3 (residential) arranged over two basement levels and six buildings arranged over ground and up to five storeys in height with associated landscaping, car parking and plant	Approved	24m east	Not EIA

Ref.	Application Number/Council ref/Location/Description	Status	Distance/Direction from Site	EIA/Not EIA
2	22/3004/FUL (LBRuT) Kneller Hall Royal Military School Of Music Kneller Road Twickenham TW2 7DU The demolition of existing modern buildings on the site and the conversion of and extensions to Kneller Hall and other ancillary buildings associated with the former royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities, sporting pavilion and forest school building. Alterations to the existing playing fields, to include an all weather pitch with fencingand floodlighting, flood lighting to existing tennis courts, sustainability measures and re-turfing. Provision of a new access from Whitton Dene, and other ancillary works including parking areas, hard and soft landscaping, lighting, access alterations and energy centre. Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller Hall, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.	Pending determination [21]	222m west	Not EIA
3	22/1168/FUL (LBRuT) Richmond Upon Thames College Langhorn Drive Twickenham TW2 7SJ Alterations and extension to existing Sports Hall including associated landscaping within the Tech Hub Development Zone to replace Tech Hub building as defined under application 15/3038/OUT (as amended), and erection of Sports Hall with associated car parking, landscaping, and other works within the Main College Development Zone including erection of a Science, Technology, Engineering and Maths (STEM) building as approved under application 19/2517/RES (as amended), retention of existing Main College building as approved under application 16/4747/RES (as amended), and associated on-site	Under construction	150m south	EIA

[21] Whilst this doesn't fit the criteria in the methodology in Chapter 5 because it is 'pending determination', it was a project identified by the LBRuT to be considered in the transport analysis. To ensure alignment, it has been included here. The Richmond College project (Cumulative Project 3 and 4) was also identified by the LBRuT for consideration in the transport analysis so have also been included here.

Ref.	Application Number/Council ref/Location/Description	Status	Distance/Direction from Site	EIA/Not EIA
	parking (non-residential) and access roads. Both Sports Halls to serve the college, schools and wider community. (Application accompanied by an Environmental Statement).			
4	21/3136/FUL (LBRuT) Richmond Upon Thames College Langhorn Drive Twickenham TW2 7SJ Demolition of existing college buildings, removal of hard-surfacing, site clearance and groundworks together with the redevelopment of the site to provide new residential units; together with associated parking, cycle parking, open space and landscaping.	Approved	360m south	EIA

1.65 As reported in **Chapter 6**, there is only the potential for effects of the Proposed Scheme in relation to operational traffic and access; noise and vibration; and air quality (all not significant when considering the Proposed Scheme in isolation). Therefore, these are the only topics considered further in the in-combination assessment.

Traffic (and associated air / noise effects)

1.66 The Cumulative Projects have the potential to increase traffic on the local road network. With the Proposed Scheme in place there will be some days where there are more arrivals and departures to the Site (i.e. on the additional non-sporting event days). In-combination with the Cumulative Projects, this could result in a cumulative increase in traffic, however background traffic on event days reduces due to pre-event warning signs and public awareness.

1.67 Overall, the increase in traffic (and associated air / noise effects) is not considered to be significant in-combination. It should be noted that the traffic on any given day would be no worse than is currently generated during existing sporting events.

Operational noise

1.68 The Cumulative Projects may each generate operational noise, which could be experienced in-combination with the noise from the Proposed Scheme. However, as reported in **Chapter 6**, the noise from the Proposed Scheme will be controlled and confined to defined periods. Therefore, overlap with noise from the Cumulative Projects will be temporary. In the instances when the noise from both the Proposed Scheme and Cumulative Projects does overlap, this is not considered to be significant due to the control measures in place for the Proposed Scheme (**Chapter 2**) and limited noise generating uses proposed by the Cumulative Projects (which include residential, education and office uses).

8. SUMMARY

1.69 Following a detailed appraisal of effects associated with the Proposed Scheme and in-combination with other projects in **Chapter 6** and **Chapter 7**, no likely significant effects have been identified**.**

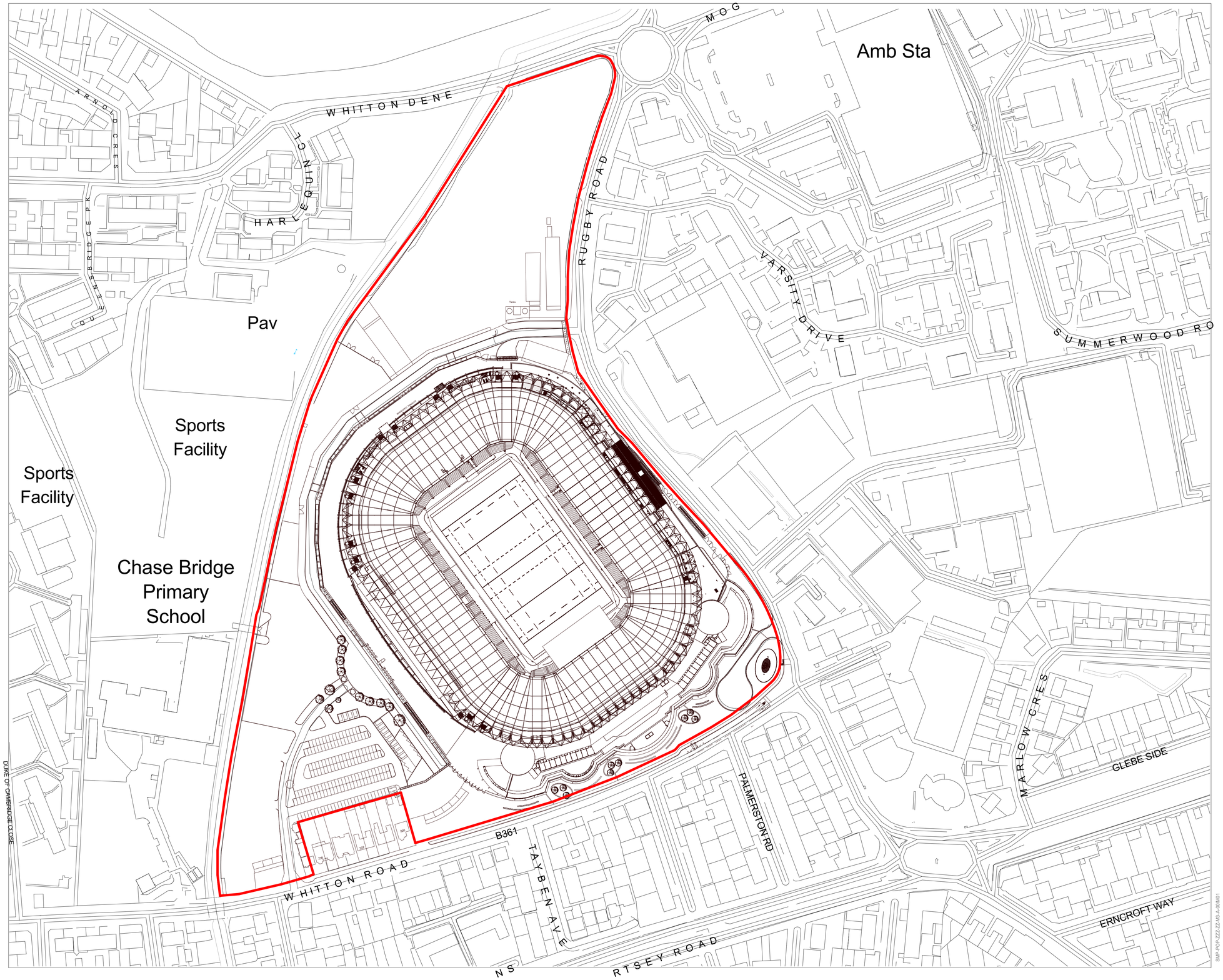
NEXT STEPS

1.70 In accordance with Regulation 6, Paragraph 6(a) of the EIA Regulations, the LBRuT has three weeks within which to provide a Screening Opinion, from the date of receipt of this request.

1.71 Regulation 5, Paragraph 5 of the EIA Regulations outlines the required contents of the Screening Opinion, which is reproduced below:

> *"(5) Where a relevant planning authority adopts a screening opinion under regulation 6(6), or the Secretary of State makes a screening direction under regulation 7(5), the authority or the Secretary of State, as the case may be, must—*
>
> *(a) state the main reasons for their conclusion with reference to the relevant criteria listed in Schedule 3;*
>
> *(b) if it is determined that proposed development is not EIA development, state any features of the proposed development and measures envisaged to avoid, or prevent what might otherwise have been, significant adverse effects on the environment; and (c) send a copy of the opinion or direction to the person who proposes to carry out, or who has carried out, the development in question."*

FIGURE 1 SITE BOUNDARY PLAN



REVISIONS

REV	DATE	DESCRIPTION
P01	28.04.25	PLANNING APPLICATION

KEY PLAN

APPLICATION BOUNDARY

CLIENT

RFU

ARCHITECT

POPULOUS®

14 BLADES COURT | DEODAR ROAD | LONDON | SW15 2NU | UNITED KINGDOM
TELEPHONE +44 (0)20 8874 7666 FACSIMILE +44 (0)20 8874 7470

PROJECT NAME

ALLIANZ STADIUM

DRAWING TITLE

SITE PLAN

STATUS	RIBA STAGE	PROJECT NO.
A2	N/A	6216

DATE	SCALE	SIZE
28.04.25	1 : 1250	A1

DRAWN	CHECKED	APPROVED
HG	PJ	PJ

PROJECT	ORIGIN.	ZONE	LEVEL	TYPE	ROLE	DRAWING	REV
SMP	POP	STZ	01	DR	AR	001802	P01

SMP-POP-ZZZ-ZZ-M3-A-00M01