

COMMITTEE REPORT

Planning Committee on
Item No
Case Number

11 September, 2024
04
24/1329

SITE INFORMATION

RECEIVED	15 May, 2024
WARD	Wembley Park
PLANNING AREA	Brent Connects Wembley
LOCATION	Wembley National Stadium, Olympic Way, Wembley, HA9 0WS
PROPOSAL	<p>Variation of conditions 1 (Event Cap) and 2 (Temporary Traffic Management) of Variation of Conditions reference 20/4197 dated 21 June, 2021, for Proposed variation of Condition 1 (event cap) of planning permission reference 18/4307 (varied permission for the construction of the stadium, dated 07/03/2019), to allow up to 9 additional major non-sporting events per event calendar year.</p> <p>Planning permission 99/2400 was for the demolition of the original Wembley Stadium and clearance of the site to provide a 90,000-seat sports and entertainment stadium (Use Class D2), office accommodation (Use Class B1), banqueting/conference facilities (Use Class D2), ancillary facilities including catering, restaurant (Use Class A3), retail, kiosks (Use Class A1), toilets and servicing space; re-grading of existing levels within the application site and removal of trees, alteration of existing and provision of new access points (pedestrian and vehicular), and parking for up to 458 coaches, 43 mini-buses and 1,200 cars or 2,900 cars (or combination thereof).</p> <p>Application reference 17/0368 granted permission to vary condition 3 (event cap) of consent 99/2400 to allow 22 additional major Tottenham Hotspur Football Club events in between 1 August 2017 and 31 July 2018.</p> <p>Application reference 18/4307 granted permission to vary conditions 1 (event cap) and 2 (temporary traffic measures) of planning permission reference 17/0368 to allow 8 additional Major Tottenham Hotspur Football Club (THFC) events to May 2019.</p> <p>The current application includes the submission of an Environmental Statement.</p>
PLAN NO'S	see Condition 3
LINK TO DOCUMENTS ASSOCIATED WITH THIS PLANNING APPLICATION	<p><u>When viewing this on an Electronic Device</u></p> <p>Please click on the link below to view ALL document associated to case https://pa.brent.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=DCAPR_168879</p> <p><u>When viewing this as a Hard Copy</u></p> <p>Please use the following steps</p> <ol style="list-style-type: none">1. Please go to pa.brent.gov.uk2. Select Planning and conduct a search tying "24/1329" (i.e. Case Reference) into the search Box

3. Click on "View Documents" tab

RECOMMENDATIONS


1. That the Committee resolve to **GRANT** planning permission subject to:
 - (i) The prior completion of a Deed of Variation to the existing s.106 Agreement to secure the following planning obligations in totality:
 1. Payment of the Council's legal and other professional costs in (a) preparing and completing the agreement and (b) monitoring and enforcing its performance;
 2. Payment of the Council's reasonable costs associated with mitigation, including the following (please note that some of these mitigation measures are all secured through the existing (E)consent):
 - i. Control of Off-Site Parking including contribution of £3,000 towards parking enforcement measures for major events (E);
 - ii. Control of On-Site Parking (E);
 - iii. Transport Signage Maintenance (E);
 - iv. Event Day Street Cleansing (E);
 - v. Temporary Traffic Management (E);
 - vi. Private Hire Management Scheme and Trusted Parking Scheme (E);
 - vii. Spectator Travel Plan (including Spectator Communication) – Updated and Monitoring Provision (E);
 - viii. Wembley Employment and Skills Plan (E);
 - ix. Stewarding Strategy (E)
 - x. Contribution towards temporary toilets (E);
 - xi. Contribution towards support for Alcohol License and Public Safety Inspections (E);
 - xii. Annual retrospective review meeting (new obligation);
 - xiii. Up to £150,000 for TfL towards Wembley Park Station CCTV and/or signage upgrades (new obligation);
 - xiv. Up to £100,000 towards a transport study, based upon a brief to be agreed with LB Brent, and up to a further £200,000 towards any recommended improvements identified within the study (new obligation);
 - xv. £750.00 per event towards LB Brent's operational costs for all events with an expected attendance greater than 51,000 persons and an additional £15,000 for each subsequent major event after Event 46 (if triggered) (new obligation);
 - xvi. Up to £200,000 towards CCTV maintenance/system upgrades around the Stadium (new obligation)

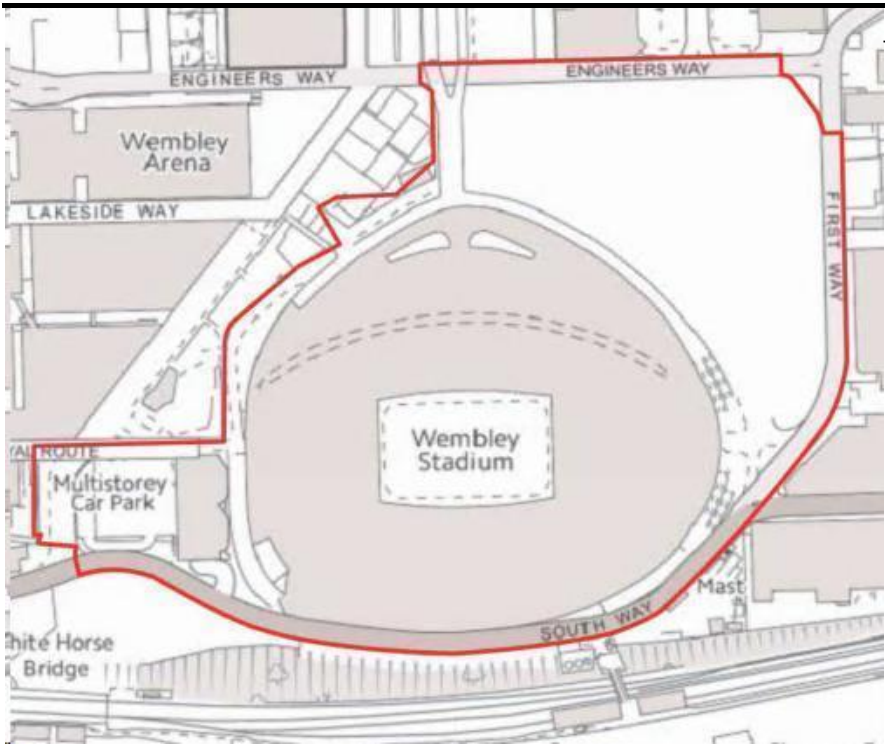
3. Indexation of contributions in line with inflation
 4. Any other planning obligation(s) considered necessary by Committee and the Head of Planning
- (ii) The additional measures (i.e., those beyond the existing obligations) would be applicable to the additional events that are proposed to take place in the future in addition to the original obligations;
- (iii) That the Head of Planning is delegated authority to negotiate the legal agreement indicated above;
- (iv) That the Head of Planning is delegated authority to issue the planning permission and impose conditions and Informatives to secure the following matters:

CONDITIONS

1. As this would technically be a new grant of planning permission, the conditions imposed on the original permission would be re-imposed, with some amendments to reflect the fact that the Stadium has been completed including the omission of conditions that have been fully discharged and are no longer valid and amendments to some other conditions. In addition, there would be:
 1. Amended Condition 1 on event cap to allow for 8no. additional major events including redefining a major event as an event in excess of 60,000 persons.
 2. Amended Condition 2 on temporary traffic management measures to be provided for no more than 54 stadium events per calendar year
 3. List of all approved plan numbers/documents

SITE MAP

	Planning Committee Map Site address: Wembley National Stadium, Olympic Way, Wembley, HA9 0WS © Crown copyright and database rights 2011 Ordnance Survey 100025260
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This map is indicative only.

PROPOSAL IN DETAIL

3. Permission is sought for the variation of conditions 1 (Event Cap) and 2 (Temporary Traffic Management) of variation of conditions reference 20/4197 dated 21 June 2021, for the proposed variation of Condition 1 (Event Cap) of planning permission reference 18/4307 (varied permission for the construction of the Stadium, dated 07/03/2019), to allow up to 8 additional major non-sporting events per event calendar year.

EXISTING

4. Wembley Stadium is an international sports and entertainments venue and the English National Stadium, located towards the centre of the London Borough of Brent. The existing Stadium was completed in 2007, following the demolition of the previous Stadium which was constructed as the Empire Stadium in the 1920s. It has a capacity of 90,000 seated, with the lower and middle tiers representing approximately 51,000 of this. The Stadium itself is within the Wembley Growth Area, and (as with the rest of the borough) is within a designated Air Quality Management Area.
5. The surrounding area is characterised by a mix of residential, commercial, retail and leisure use. There is a Strategic Industrial Location ('SIL') to the east, and Wembley Town Centre is to the immediate west of the Stadium. Within the Growth Area there are a number of sites which have been allocated for redevelopment, many of which have been completed, or are currently under construction.
6. To the north, south and west the railway lines are Wildlife Corridors, and a Site of Importance for Nature Conservation ('SINC'). There are also flood zones in the vicinity. All are a significant distance from the Stadium itself, but it is accepted that the impacts of the Stadium extend beyond its boundaries.
7. The nearest conservation areas are Wembley High Street to the west, and Barn Hill to the north. The Grade II listed Wembley Arena (originally called the Empire Pool) is situated to the north-west of the Stadium.

SUMMARY OF KEY ISSUES

2. The key planning issues for Members to consider are set out below. Members will need to balance all of the planning issues and objectives when making a decision on the application, against policy and other material considerations.
 - a. **Comments received:** A 274-signature petition and 166 comments have been received objecting to the application, in addition to 6 comments in support. The comments are discussed later in this report.
 - b. **Principle:** An event cap was imposed on the original permission for the Stadium, to enable its use while the necessary road and public transport infrastructure works were completed to facilitate a more intensive use of the Stadium. Through various applications, the event cap has increased but with accompanying mitigation measures to manage that increase. The applicant advises that the proposed increase in the event cap from 46 to 54 major events per calendar year, and with the definition of a major event increasing from 51,000 persons to 60,000 persons, would enable the National Stadium to remain competitive with other stadia in London and nationally. Local Plan Policy BHC2 (National Stadium Wembley) recognises the importance of the National Stadium to Brent, London and the Country and is supportive of proposals that contribute to the continued success of

the National Stadium as a “world renowned location for sport and cultural events”, providing that those proposals mitigate potential adverse effects. Many objectors consider that the number of events currently held at the Stadium already has an unacceptable level of impact on local residents. While the number of higher capacity events would increase, it should be borne in mind that unlimited events with up to 51,000 attendees can take place within the terms of the existing planning consent (proposed to be increased to 60,000 attendees). Additional mitigation measures would be secured. Some of these measures would relate to all major events and some would relate to the additional non-sporting events. Impacts undoubtedly occur when major events are held (including those under 51,000). On balance, taking into account the importance of the Stadium recognised in policy, the proposed mitigation measures are considered to be sufficient to warrant the additional 8no. full-capacity events proposed.

- c. **Highways Impact:** Traffic management measures are required under the existing consent for events that have a capacity of over 10,000 persons and such measures would continue to be provided with the uplift in major events and with the definition of a major event increasing from 51,000 persons to 60,000 persons. An unlimited number of events can already take place up to a maximum capacity of 51,000 (proposed to increase to 60,000). However, higher capacity events have a greater impact and the length of time taken to clear the highway and public transport network is longer for full capacity events than it is for lower capacity events.
- d. **Socio-economic:** It is recognised that the increase in the event cap from 46 to 54 and the removal of the swap provision will enable the Stadium to host a greater number of non-sporting events, which provide greater economic benefits than sports matches. It is estimated that should the proposed 8 additional major events attract similar average crowd sizes as the major non-sporting events held at the Stadium in 2022 and 2023, this would result in additional direct expenditure in the local area of £34.8 million. Moreover, additional events at greater capacity will also result in an increase in the number of event-day staff required to manage and host such events. Whilst a certain amount of weight has been placed on the socio-economic benefits specified within the submission (to also include re-securing an Employment and Skills Plan), it is recognised that not all sectors of the local economy will benefit as some may lose trade on event days as the congestion and high level of general activity may discourage some economic activity. However, the recommendation for this application is based more on the benefits associated with the mitigation package rather than the socio-economic benefits specified in the submission.
- e. **Cumulative Impact:** There have been substantial changes to the local area since the Stadium was constructed, with an increased residential population. These have been considered during the assessment.
- f. **Noise:** The nearest residential building is sited approximately 35m from the Stadium, however new homes surrounding the Stadium have been designed to take into account the noise and operation of the Stadium. The submitted Noise Assessment demonstrates that provided the music noise level of the additional events will be controlled in the same way as existing then the noise level from event should not cause any adverse impact on residential receptors. With regard to traffic noise, any impact is considered to be negligible.
- g. **Air Quality:** The submitted Air Quality Assessment demonstrates that the additional events will not have a significant effect. An Air Quality Neutral Assessment is not required however the applicant has provided some information that demonstrates that the development would be air quality neutral.
- h. **Environmental Statement:** The mitigation measures that are proposed to be secured through the S106 legal agreement are considered to sufficiently mitigate the potential impacts.

RELEVANT SITE HISTORY

8. Planning permission (**ref: 99/2400**) was **granted on 23 August 2002** for the demolition of the original Wembley Stadium and clearance of the site to provide a 90,000-seat sports and entertainment stadium (Use Class D2), office accommodation (Use Class B1), banqueting/conference facilities (Use Class D2), ancillary facilities including catering, restaurant (Use Class A3), retail, kiosks (Use Class A1), toilets and servicing space; re-grading of existing levels within the application site and removal of trees, alteration of existing and provision of new access points (pedestrian and vehicular), and parking for up to 458 coaches, 43 mini-buses and 1,200 cars or 2,900 cars (or combination thereof).
9. Planning permission (**ref:17/0368**) was **granted on 18 August 2017** to vary Condition 3 (Event Cap) of consent 99/2400 to allow 22 additional major Tottenham Hotspur Football Club events between 1 August 2017 and 31 July 2018.
10. Planning permission (**ref:18/4307**) was **granted on 07 March 2019** to vary Conditions 1 (Event Cap) and 2 (Temporary Traffic Measures) of planning permission reference 17/0368 to allow 8 additional Major Tottenham Hotspur Football Club (THFC) events to May 2019.
11. Planning permission (**ref:20/4197**) was **granted on 21 June 2021** to variation of Condition 1 (Event Cap) of planning permission reference 18/4307 (varied permission for the construction of the Stadium, dated 07/03/2019), to allow up to 9 additional major non-sporting events per event calendar year.

CONSULTATIONS

Statutory and Internal Consultees

Consultee	Comments:	Officer response:
Environmental Health	<p>The applicant has submitted a Vangardia noise assessment dated April 2024 with the application. This assessment demonstrates that provided the music noise level of the additional events is controlled in the same way as existing then the noise level from event should not cause any adverse impact on residential receptors. The traffic noise level has also been assessment and it is concluded that the impact will be negligible. Therefore, I have no objections to this application in terms of noise.</p> <p>The applicant has submitted an Air Quality consultants air quality assessment and air quality neutral technical note. The air quality assessment demonstrates that air quality effects are not significant. In addition, the comparison of the known and expected vehicle trips against the transport emission benchmark shows that the variation of the event cap will be air quality neutral. Therefore, I have no objections to this application in terms of air quality.</p>	Noted
Public Safety	No objections	Noted.
Met Police (DOCO)	No comments to make.	Noted
London Fire	If there are any deviations to Brigade access	No changes are

Brigade	and facilities, then this information needs to be provided to Fire Safety Regulation (FSR-AdminSupport@london-fire.gov.uk) to review the proposed provision.	proposed.
TfL	No objections are raised subject to securing an updated Spectator Travel Plan and £150,000 towards Wembley Park Station CCTV and/or signage upgrades	Noted. The Spectator Travel Plan and financial contribution will be secured through an updated legal agreement.
Transport	There are no objections in principle on transportation grounds to this relaxation to the cap on the number of major events held at the Stadium, subject to the undertaking of updated Travel Plan surveys at the earliest opportunity to identify current modal split figures and subject to a s.106 Agreement to secure financial contributions towards: (i) the on-going maintenance of HVM equipment in the area; (ii) a review of HVM provision, routes to and from Wembley Central, pick up and drop off points and parking pressures in hot spots and / or residential areas; and (iii) the upgrade of two-way radio and public space CCTV systems.	Noted. Proposed contributions towards (ii) and (iii) will be secured through an updated legal agreement. A contribution towards hostile vehicle mitigation ('HVM') maintenance is secured separately through an informal agreement, known as 'Best in Class', between the Stadium, the Council, and Quintain.
Network Rail	No objections are raised. To support improving passenger experience and wayfinding during event days a contribution towards station enhancements at Wembley Park was requested by TfL. A contribution of £150,000 towards Wembley Park Station CCTV and/or signage upgrades has been agreed and should be secured within the s.106 agreement	Noted.
Chiltern Railways	As the key mainline rail operator serving and operating Wembley Stadium Station, we carry between 8 and 12% of customer flows for Wembley events including major football fixtures and summer concerts. We recognise that the uplift in the event cap is necessary for commercial reasons, and that as a consequence the actual level of additional travel demand which may arise could be less than the revised event cap allows. We also recognise and are supportive of the positive impact that events at Wembley have on the local and wider economy. If the event cap is extended by a further 8 events Chiltern Railways will continue to assess each event on an individual basis and collaborate with the stadium and other transport operators (including Transport for London) through our established channels and arrangements to support service delivery and accommodate the shared travel demands arising.	Noted
Westminster City Council	Does not wish to comment on the proposal(s)	Noted
LB Barnet	No comments have been received.	

Royal Borough of Kensington and Chelsea	<p>No objections are raised.</p> <p>An Informative is attached reminding the Council/Applicant of the adverse impact that construction works can potentially have on the highway network.</p>	The proposal does not involve any construction works.
LB Harrow	No comments have been received.	
LB Hammersmith & Fulham	No comments have been received.	
Quintain	<p>The proposal is supported subject to the following conditions:</p> <p>From reviewing the representations submitted by local residents, it is clear that event day management, and in particular stewarding and post-event cleaning, are areas of significant concern. Therefore, WNSL should commit to paying all the operational and management costs associated with the additional events and/or any event that exceeds the existing caps of 22 sporting events and 24 non -sporting events in a calendar year.</p> <p>WNSL have highlighted the success of the triparty 'Best in Class' initiative between WNSL, Quintain and Brent, which currently manages the impacts of event days upon the local area and state this will be implemented for the additional events. Whilst we agree that the 'Best in Class' principles covering stewarding, parking enforcement, traffic management, toilets and street cleaning should apply to the additional events, the increased costs associated with delivering these should be borne wholly by WNSL.</p> <p>To ensure residents' amenity is adequately protected, WNSL should commit to the following restrictions on events:</p> <p>a cap on the maximum number of consecutive non -sporting events;</p> <p>a cap on the maximum number of non-sporting events per week; and</p> <p>a cap on the maximum number of weeks in any calendar year where the maximum number of consecutive non -sporting events or maximum number of non-sporting events in a week can be held.</p> <p>The above conditions should be included in the s.106 Agreement (Deed of Variation).</p>	Noted.

	<p>Should they not be secured, Quintain reserve the right to make further representations.</p> <p>As a participant in the Best in Class initiative, and owner of land within the planning application boundary where many of these measures will take place, Quintain would expect to be consulted on the Deed of Variation before it is completed</p> <p>We would also request that WNSL, TfL and Brent work closely on mitigating the impact Stadium events have upon existing bus routes and services to ensure residents are able to carry on their daily lives and move around the area on event days with the minimum of disruption.</p>	
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Public Consultation

12. Letters were sent to the occupiers of 49,241 properties within the Event Day Parking Restriction Zone, in addition to statutory site and press publicity. Six comments were received in support of the application, citing the need for larger, improved facilities for the community.
13. 166 letters and a 274 signature petition were received objecting to the proposal, raising some or all of the following points:

Comment	Officer Response
General	
The disruption and inconvenience for residents is intolerable at the current level of events	The impact of events is acknowledged, but there are measures proposed which look to mitigate the impact of major events held at the Stadium. Moreover, the proposal does not affect the number of events that could take place at the Stadium, just the capacity of the crowd.
Amenity	
Noise disturbances; increased exposure to noise during the day and late at night	<p>A noise assessment has been undertaken and concludes that the proposed increase in the number of events at the Stadium would be unlikely to result in a significant adverse impact.</p> <p>The effect of noise generated from major non-sporting events would be controlled by the premises licencing requirement. No additional mitigation measures are proposed or required.</p>
Loss of privacy through increased crowds	An event day management plan is in place to control who can access areas around

	entrances to residential buildings.
Reduced quality of life	It is recognised that event days will result in certain level of disruption, however these are mitigated as much as possible.
Socio-economic	
Reduction in services provided to residents on event days	As above.
Negative economic impact on businesses further away from stadium	<p>The supporting Environmental Statement assesses the impact of the proposal would result in a permanent, minor beneficial impact on the economy and labour market of the wider impact area.</p> <p>The proposal would support estimated additional direct expenditure in the local area in the order of £34.8 million.</p>
Increased pressure on local businesses	As above.
Failure to establish balance between the interests of WNSL and local residents.	As above. Further, there are mechanisms in place which allocate tickets to the local community through neighbourhood action groups. This will be reviewed by WNSL.
Local shops increase prices	Noted
Insufficient toilet facilities leading to frequent urination in streets and gardens	Toilets on the concourse would continue to be made available for use before and after events at the Stadium.
Fear for safety on event days, including racial harassment; Increase in anti-social behaviour; feeling of loss of safety	<p>The overall impacts of additional events are considered in depth in the main body of this report. General disruption to day to day life for local residents is acknowledged. Increased number of events will create a level of noise and disturbance, and restrictive conditions are monitored in this regard.</p> <p>There is an extensive CCTV and a dedicated officer to monitor the system on event days. Increased police presence is also provided on event days to identify and deter anti-social behaviour.</p>
Widespread littering; insufficient bin capacity; litter tidy-up following events is inadequate and does not extend beyond immediate vicinity of Stadium.	Street cleaning is undertaken by the Council, at the applicant's expense, following events. Additional litter bins have been provided by the applicant around the Stadium.
Highways Matters	
Increase in traffic; heavy traffic on events and local journeys will be delayed; local road closures; restriction on freedom of movement for residents; impact on emergency services	WNSL operates a programme of actively promoting sustainable modes of transport with the aim of reducing the number of journeys made in private vehicles. These initiatives

<p>and road safety; locals unable to park near homes due to traffic restrictions</p>	<p>include:</p> <p>Regular advertising of public transport facilities;</p> <p>Public transport information through ticketing and the Stadium website;</p> <p>Promotion of coach travel through partnership with National Express;</p> <p>Provision of 40 cycle parking spaces at Level B2;</p> <p>Publishing public transport access information prior to events;</p> <p>Providing live travel updates for public transport on event days.</p> <p>Travel Plan surveys will be undertaken to identify current modal split figures and financial contributions to traffic management will be secured through legal agreements.</p> <p>Measures are already in place, and will continue to be enforced, to reduce as far as possible the number of cars visiting the area on event days.</p>
<p>Poor traffic management on event days; road closures not advertised sufficiently well; notification of event day parking restrictions inadequate; not enough advanced notice of events; poor communication around what dates events will take place on – residents should be notified 2 weeks in advance</p>	<p>As above. The Council is committed to improving communication of events. The Controlled Parking Zone (CPZ) and highways management will be subject to review. Expansion to the CPZ would require public consultation and review before any changes are implemented.</p> <p>Parking enforcement are aware of the issues and are seeking to manage these. The aim is to reduce travel by private car for all events and this will be monitored and managed through updated Travel Plans.</p> <p>The opening of an extension to North End Road to connect to Bridge Road allows unfettered access by local residents and businesses to the northeast of the Stadium on events days, before, during, and after events.</p>
<p>Residents and local schools sell driveway spaces to event visitors</p>	<p>A joint scheme between Brent Council, WNSL and Quintain has been set up to address illegal car parks surrounding the Stadium. Action undertaken to date has focused on larger unlawful car parks due to their greater level of impact.</p>
<p>Increase in pollution</p>	<p>An air quality assessment has been undertaken by Air Quality Consultants Ltd, with the assessment concluding that the</p>

	<p>particulate levels would be below the objectives at all existing receptors, and that the impacts of these pollutants would be negligible.</p> <p>The assessment has considered the 'worst case' scenario and judges the potential effects on air quality as not significant. The increases are not considered to be so significant as to refuse the planning permission.</p>
The event cap exists for a reason	The alterations to the car and coach parking arrangements and highway network on the eastern side of Wembley Stadium, which allow Stadium traffic and local residential/business traffic to be kept largely separate, meet the aspirations of the original planning permission to provide a high quality highway arrangement for Stadium parking that minimises disruption to the local community. The original reasons for the event day cap have therefore now been largely addressed and there are no longer any highways concerns in principle with the event cap being eased.
High Street is too narrow to accommodate the increased foot fall on event days; pedestrian pathways in poor condition; general quality of roads is poor (potholes)	Wembley High Road, inclusive of footpaths, is of a sufficient width. Repairs to highways infrastructure maintenance is part of an ongoing borough-wide maintenance programme.
Wembley Park Station beyond capacity	The station now has capacity for 50,000 passengers per hour to pass through the station. Additional underground services are provided on the Metropolitan and Jubilee lines from Wembley Park Station to ease passenger congestion.
Dedicated uber/taxi pickup points should be considered	A temporary taxi rank is set up on Engineers Way.
Event stakeholders should contribute to cost of resident parking permits for event days	
Overcrowded public transport/poor access to local public transport networks	<p>The impact of events on the public transport networks is acknowledged.</p> <p>A Spectator Travel Plan ('STP') has been produced to assist with the long-term management strategy for the sustainable movement of people both to and from the Stadium. A key focus of the STP will be to encourage walking & cycling as an alternative to car and public transport use.</p> <p>Crowd retention measures have been implemented at the end of events with the aim of extending the period over which spectators depart the Stadium, and thereby easing overcrowding at local stations.</p>

Equalities/Disability Discrimination Act	
<p>As a resident living near the stadium and a carer of a disabled child, the current number of events already causes significant disruption to our daily lives. We use a Motability car, but the council does not issue us an event day parking permit. Consequently, we are forced to leave our home on event days due to the lack of available parking.</p> <p>This situation has a profound negative impact on my disabled child, who finds these disruptions highly distressing. Increasing the number of events would exacerbate these issues, leading to:</p> <ol style="list-style-type: none"> 1. More Frequent Displacement: <p>Additional event days would mean more days where we are compelled to leave our home, causing further stress and logistical challenges.</p> <ol style="list-style-type: none"> 2. Negative Impact on Well-Being: <p>The forced displacement on event days severely disrupts my child's routine, which is crucial for their emotional and physical health.</p> <ol style="list-style-type: none"> 3. Parking Difficulties: <p>Without an event day parking permit, finding suitable parking is already challenging, and an increase in events would worsen this problem.</p>	<p>This resident could apply for a Blue Badge for their dependent child. This would allow them the ability to park in designated bays within the event day zone on event days, without the need to purchase individual event day permits.</p>
Other Matters Raised	
<p>Too much burden on local infrastructure.</p>	<p>Potential impacts are mitigated, as set out within this report.</p>
<p>Insufficient policing</p>	<p>Approval of all events is co-ordinated by the Brent Safety Advisory Group (which involves representatives from all emergency services).</p> <p>Wembley Stadium events are planned and resourced centrally. Consideration is given to borough staffing numbers in order to prioritise front line policing and other core priority roles. The Wembley policing requirement may come from the local Basic Command Unit if surplus resources are available, but in the event that numbers dictate otherwise, or the Wembley requirement is substantial, neighbouring boroughs or further afield will be used to fulfil the Wembley requirement.</p> <p>The stewarding and staffing plans are also designed to limit the burden on policing</p>

	resources, again should policing resource in the Stadium be required, these costs are covered by the Stadium.
Increased stress on local NHS services	As above.
Impact on mental & social wellbeing	
Combined impact on WNS events and OVO arena events has not been considered.	It is acknowledged that there would be additional vehicular and pedestrian traffic on events days, but mitigation measures would be in place to maximise the use of public transport. Crowd retention measures would be put in place to control the pace at which attendees leave the venues to ensure the public transport network is not overwhelmed. These measures will also help to reduce noise levels following events.
Increasing the 'major event' capacity means no 'event day' will be triggered.	As above. The same measures are implemented for major and non-major events.
Lack of justification behind increase in events	<p>The event cap of 22 major sporting and 15 major non-sporting events was introduced by planning condition 1 attached to the approval notice 18/4307. It was put in place until:</p> <p>Improvements were made to Wembley Park Station ('WPS') to achieve a capacity of 50,000 persons per hour; and</p> <p>Roads known as Estate Access Corridor and the Stadium Access Corridor were constructed.</p> <p>The necessary improvements to WPS have now been made.</p> <p>The Estate and Stadium Access Corridors have not been carried out as originally proposed. Subsequent agreements have been reached between the applicant and Brent Highways to deliver alternative access corridors and highway improvements in accordance with recommendations from the security services.</p> <p>The intensification is considered in detail in the main body of the report below.</p>
The current event cap exists for a reason	As above.
Residents should be offered priority tickets to events	There are already mechanisms in place which allocate tickets to the local community through neighbourhood action groups. This will be reviewed by WNSL.
There are no benefits to local residents	As above. Further, the proposal could support a total of between 33,200 and 44,000

	additional employment opportunities for event staff annually, including stewards and caterers
Access to community facilities impacted on event days	Some facilities within the immediate vicinity of the Stadium may be more difficult to access whilst event day crowds gather pre and post event. This is temporary.
Decrease in properties value	Property values are not a material planning consideration.
Concerns granting this application would lead to future applications to further increase event cap	Any future application to further increase the event cap would be subject to a robust assessment against planning considerations. There is no guarantee that any future application would be granted permission.

POLICY CONSIDERATIONS

14. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that the determination of this application should be in accordance with the development plan unless material considerations indicate otherwise.
15. The development plan is comprised of the London Plan (2021) and the Brent Local Plan (2022). Key policies include:

The London Plan

GG1	Building strong and inclusive communities
GG5	Growing a good economy
GG6	Increasing efficiency and resilience
SD1	Opportunity areas
SD10	Strategic and local regeneration
D11	Safety, security and resilience to emergency
D14	Noise
S5	Sports and recreation facilities
E4	Land for industry, logistics and services to support London's economic function
E10	Visitor infrastructure
E11	Skills and opportunities for all
HC5	Supporting London's culture and creative industries
HC6	Supporting the night-time economy
S11	Improving air quality
T1	Strategic approach to transport
T3	Transport capacity, connectivity and safeguarding
T4	Assessing and mitigating transport impacts
T5	Cycling
T6	Car parking
T6.4	Hotel and leisure uses parking
T6.5	Non-residential disabled persons parking
T9	Funding transport infrastructure through planning

Local Plan

DMP1	Development management general policy
BS11	Social infrastructure and community facilities
BE1	Economic growth and employment opportunities for all
BE4	Supporting strong centres
BE9	Visitor accommodation and attractions
BHC1	Brent's Heritage Assets
BHC2	National Stadium Wembley

BHC3	Supporting Brent's culture and creative industries
BHC4	Brent's night time economy
BSUI1	Creating a resilient and efficient Brent
BSUI2	Air quality
BT1	Sustainable travel choice
BT2	Parking and car free development

Other Relevant Policy Considerations

National Planning Policy Framework ('NPPF')
 Planning Practice Guidance
 Mayor of London – Air Quality Neutral LPG (Feb 2023)
 LB Brent S106 Planning Obligations Supplementary Planning Document (2022)
 LB Brent Air Quality Action Plan 2017-2022
 Community Infrastructure Levy Regulations 2010
 London Cycling Design Standards

DETAILED CONSIDERATIONS

Background

16. The site has been used as a Stadium since 1923. Over time the Stadium became outdated and no longer met the standards in terms of facilities that were expected at a major venue. A planning application was submitted in 1999 (ref: 99/2400) alongside a listed building consent (ref: 99/2399) for its demolition and the construction of a 90,000 seat English National Stadium. Planning permission was granted in August 2002, subject to a number of conditions. The new Stadium was opened in 2007 and has held sporting and non-sporting events since. It is now well established as a world-class sporting and non-sporting venue; known for being the home ground of the English national football team and hosting regular events such as the FA Community Shield, EFL Cup Final, FA Cup Final and EFL Championship play-off final. The Stadium also competes to hold other significant events such as finals for the UEFA Champions League, 2012 Olympic Games football tournament finals, NFL International Series games and major concerts. In June/July 2021, the Stadium hosted the postponed Euro 2020 semi-finals and final and four other matches, and most recently hosted the 2024 UEFA Champions League Final.
16. To mitigate against the impact of the new Stadium, negotiations between the Council and WNSL during the determination of the original planning application led to the agreement of several s.106 contributions and obligations. This included contributions towards the following schemes:
 1. Estate Access Corridor – the widening of the Great Central Way road bridge, the extension of Hannah Close and the widening and surfacing of Atlas Road and Fourth way to adoptable standards;
 2. Stadium Access Corridor – the widening and straightening of Great Central Way and South Way to provide three traffic lanes for tidal traffic movement on event days;
 3. Contributions towards improvements at Wembley Park, Wembley Central, and Wembley Stadium Stations; and
 4. A contribution towards off-site parking control.

17. In addition, the London Underground Limited Board gave written undertakings to the Council to rebuild Wembley Park Station with safe operational capacity in event mode of 50,000 people per hour. This was on the condition of a £9 million s.106 contribution from WNSL.
18. Until the improved infrastructure was in place, it was considered that there would be some justification for limiting the number of events. If the infrastructure improvements had not been completed two years after the completion of the Stadium, then an unlimited number of additional events over and above the cap specified in the condition would be permitted, subject to the number of spectators being limited to up to 51,000. The cap does not include European Cup and World Cup events where England/UK is the host nation.
19. The Estate Access Corridor was completed. However, the Stadium Access Corridor was only partially completed, and the current situation is discussed further in the Transportation section of this report.
20. The Event Cap has been subject to multiple applications to secure both temporary and permanent variations since the Stadium first opened. A summary of changes to the Event Cap is provided in the Table below. This notably enabled additional Tottenham Hotspur FC ('THFC') games during the 2017/18 – 2018/19 football season whilst its new stadium was under construction (planning refs: 17/0368 and 18/4307) and to allow for an increase of 9no. additional major non-sporting events per calendar year (planning ref: 20/4197).

Table 1: Event Cap Planning History (source: Planning Statement)

Permission Reference	Sporting Events Permitted Per Year	Non-sporting Events Permitted Per Year	Swap Provision	THFC Games	Unlimited Additional Events
99/2400	22	15	Yes	N/A	Yes. Subject to spectators being limited to the lower and middle tiers
17/0368	22	15	Yes	22 (between 1 August 2017 and 31 July 2018)	Yes. Subject to spectators being limited to the lower and middle tiers
18/4307	22	15	Yes	22 (+3 events at 90,000 capacity and +5 events at 62,000 for specific THFC fixtures)	Yes. Subject to spectators being limited to the lower and middle tiers
20/4197	22	25	Yes	N/A	Yes. Subject to spectators being limited to the lower and middle tiers (c.51,000)

Changes sought under the current application

21. Changes are sought to the event cap to enable the Stadium to compete with other stadia in attracting, primarily, music artists. However, in order to do so, flexibility in dates is sought to meet the needs of promoters in order to guarantee those bookings. New pitch technology has allowed the once necessary gap between the end of the concert season and the start of the football season (i.e., FA Community Shield) to be reduced, due to pitch surfaces grown off site (i.e., 'Lay and Play' technology).

Condition 1

22. Condition 1 currently states:

That until the following works are completed to the satisfaction of the Local Planning Authority and written confirmation as such is given to the applicant or owner or occupier:

- 1. Improvements to Wembley Park Station to achieve a capacity of 50,000 persons per hour and*
- 2. Construction of roads known as the Estate Access Corridor and the Stadium Access Corridor*

and unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full, the number of major sporting events held at the stadium in any one year shall be restricted to no more than 22 (to exclude European Cup and World Cup events where England/UK is the host nation) and the number of major non sporting events shall be restricted to 24. This shall be described as the cap. Up to three additional major sporting events shall be permitted in any one year provided that for each additional sporting event there is a reduction of two non sporting events in the same year.

If after two years following the completion of the stadium the works specified above have not been completed, and until such time as the works have been completed, then additional events over and above the cap specified above shall be permitted subject to the number of spectators being limited to the capacity of the lower and middle tiers of the stadium.

Note: for the purposes of this condition major event means an event in the stadium bowl with a capacity in excess of 10,000 people where the lower, middle and upper tiers of the stadium may be occupied.

23. It is proposed to amend Condition 1 to read as:

That until the following works are completed to the satisfaction of the Local Planning Authority and written confirmation as such is given to the applicant or owner or occupier:

- 1. Improvements to Wembley Park Station to achieve a capacity of 50,000 persons per hour and*
- 2. Construction of roads known as the Estate Access Corridor and the Stadium Access Corridor*

The number of major events held at the stadium in any one calendar year shall be restricted to no more than 54 (to exclude European Cup and World Cup events where England/UK is the host nation). This shall be described as the cap. Within the event cap, the number of major events involving UK based domestic association football teams shall be restricted to more than

25.

Note: for the purposes of this condition major event means an event in the stadium bowl with a capacity in excess of 60,000 people.

A calendar year runs from 1 January to 31 December

Condition 2

24. The proposed amendment to Condition 2 (in bold) is provided below:

*Temporary traffic management measures shall be provided for no more than ~~46~~ **54** stadium events per calendar year, unless a scheme for an alternative number is submitted to and approved in writing by the local planning authority.*

Reason: To enable the A406 North Circular Road to continue to be used efficiently as part of the national system of routes for through traffic in accordance with section 10(2) of the Highways Act 1980 and to ensure the continued safety of traffic using that road.

25. In addition to the proposed changes to the wording of Conditions 1 and 2, a new Deed of variation (DoV) to the original s.106 Agreement will be required to secure the ongoing and necessary planning obligations.

26. In summary, the revised Event Cap:

- 1 Removes the reference to 'sporting' and 'non-sporting' events to provide additional flexibility, while controlling the number of major events.
- 2 Increases the overall Event Cap from 46 to 54 major events per year;
- 3 Limits the number of association football matches (including for women's games) to 25;
- 4 Removes the 'swap' provision which allowed for up to 3 additional major sporting events where there is a reduction of 2 non-sporting events per additional sporting event as this provision would become irrelevant with the removal of the reference to 'sporting' and 'non-sporting';
- 5 Redefines the start and end dates of the Event Cap year (to align with a calendar year); and
- 6 Revises the definition of what attendance number constitutes a major event to reflect the public transport capacity which is now available for visitors to the Stadium (including the increased capacity of Wembley Park station to disperse visitors at the end of events) and modern ticketing systems which can be used to confirm attendance numbers.

Table 2: Potential number of events proposed

Permission Reference	Maximum total major events	Maximum major domestic Association Football matches
24/1329 (current application)	54 (including football)	25

27. As highlighted above, the proposed changes in the revised wording of condition 1 removes the reference to "sporting" and "non-sporting". Previously, all sporting events were included within the same 'bracket' of event type, which included football and non-football sporting

events such as NFL, Boxing, etc.

28. The proposed change simplifies this to 'Football Major Events' and 'Major Events'. This allows a control on the maximum number of Domestic League Football fixtures at full capacity of no more than 25 per annum but would allow for the total number of major events that are NOT domestic league football to be no more than 54 per annum.
29. This allows for greater flexibility to host an increased number of non-footballing events within the overall proposed cap of 54 major events, whereas previously, there was limited flexibility through a "swap provision" which exchanged major footballing events for non-footballing events, but in a more complex manner which made scheduling events at the Stadium more difficult.
30. The proposed amendment to the condition would allow for a maximum of only 25 major domestic Association Football matches (this excludes European and World Cup events where England or the UK is a host nation).
31. It is also important to note that a condition previously imposed limiting the number of major non-sporting events to not take place on more than 4 consecutive days, would be reimposed.

The Principle of Additional Major Events

32. In planning policy terms, the ongoing operation, and the introduction of additional events at Wembley Stadium is supported by regional and local policy.
33. Paragraph 97 of the NPPF requires planning policies and decisions to plan positively for the provision and use of shared space and community facilities (including sports venues) to enhance the sustainability of communities and residential environments and guard against unnecessary loss of valued facilities and services. The NPPF states that the planning system should do everything it can to support sustainable economic growth (paragraph 86).
34. At the local level, Local Policy BCGA1 (Wembley Growth Area) confirms that Wembley will be the driver of economic regeneration in the borough, generating jobs in sports, leisure, tourism and visitor attractions, amongst other sectors.
35. Policy BHC2 (National Stadium Wembley) confirms that proposals that contribute to the National Stadium's continued success as a world renowned location for sport and cultural events will be supported. Proposals which increase the frequency and volume of use of the National Stadium beyond existing consents will be required to mitigate potential adverse effects to acceptable levels.
36. Policy BHC3 (Supporting Brent's Culture and Creative Industries) seeks to build on the work of the area's current creative and cultural facilities to promote better opportunities for such activities to thrive. Policy BHC4 (Brent's Night Time Economy) states that the council through its own actions and working with others will support Brent's night time economy. Development that preserves or enhances existing night time economy activities or creates new ones that will reinforce the role and significance of each centre in the London hierarchy (which includes Wembley) in an inclusive and accessible way will be supported.
37. Policy BSUI2 (Air Quality) requires major developments within Growth Areas to be Air Quality

Positive and elsewhere, Air Quality Neutral.

38. Given the above policy context, the principle of additional major events is supported in planning policy terms, but this increase in events would only be considered acceptable in planning terms if they have an acceptable impact in terms of key considerations including socio-economic, transport, noise, and air quality impacts.

Environmental Impact Assessment

39. The application is subject to an Environmental Impact Assessment ('EIA'). This is made up of an Environmental Statement ('ES'), which is supported by technical appendices, and a Non-Technical Summary.
40. The ES includes a section on the background to the proposals, and a detailed description of the proposed changes along with the planning policy context. There is a further section on the methodology, scope and approach. Following on from this the main topic based issues are assessed. They are:
 41. Socio-economic effects
 - Transport
 - Air Quality
 - Noise
 42. The ES is structured around identifying impacts, where these impacts are felt, how significant they are, and whether they are adverse or beneficial. It does this with reference to the existing baseline conditions, the characteristics of the proposal and any mitigation effects, and whether there are any cumulative effects.
 43. Schedule 4 of the EIA Regulations (2017) does not require an applicant to consider alternatives, however, where alternatives have been considered, there is a requirement that the applicant will include in their ES a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size, and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.
 44. The applicant notes, as previously submitted, that the Stadium already hosts a range of major national and international sporting and non-sporting events. The amendments sought are to enhance the programme of events at the Stadium and meet demand for concert space to attract artists to the Stadium. As such, no alternatives have been considered.

Socio-economic Impact

Background

45. The Football Association ('The FA') commissioned an economic impact study of Wembley Stadium for the 2017/18 event season to assess the economic impact of the Stadium in general, and specifically within Brent, the London economy more widely and across England.

This report draws on an analysis by consultants Deloitte, consultations with the FA, Tottenham Hotspur (previous users of the Stadium for home matches) and surveys with visitors, residents and businesses in the area. It has also been updated since the previous application to take into account the impact caused by the Covid pandemic.

46. The economic impact of the Stadium varies from year to year in line with the number of events (58 in 2017/18 owing to Tottenham Hotspur's use of the Stadium) and the type of events that are held. However, in headline terms, the economic impacts of the Stadium included:
 1. A total gross expenditure of £827m as a result of the 58 events held at the Stadium during the 2017/18 season. A total of 91% of this expenditure was from spectators but these figures also include spending by event organisers and performers/support staff.
 2. The highest proportion of total gross expenditure is associated with accommodation (£216m) (26%), closely followed by ticket sales (£213m) (26%) and food and drink (£196m) (24%). This expenditure results in the creation of local jobs and higher revenues for local businesses.
 3. The majority (92%) of the gross expenditure occurred outside Wembley Stadium (£762m) in local shops, hotels, bars and restaurants. Around 85% of the gross expenditure was in London, and this includes £190m of expenditure in local businesses in Brent.
 4. Events at Wembley attract visitors from all over the country, and for some events (e.g. international fixtures, major concerts), spectators travel to Wembley from outside of the UK. Surveys indicate a high proportion of hotel stays, and linked trips to other parts of England, by overseas visitors. The average stay of overseas visitors is 4.5 nights.
47. On average, the 7 concerts held at Wembley Stadium in 2017/18 attracted £29m each in gross expenditure, which was the highest level of expenditure per event when compared to the 51 sporting events (primarily football), which attracted £12m per event.
47. During the 2017/18 season, the direct economic impact to the local area associated with hosting the 17 events staged by event organisers other than The FA and Tottenham Hotspur averaged £46 per visitor, comprising accommodation (£22), food and drink (£12), travel (£5), retail (£4) and miscellaneous other shopping (£2) (Unlike the gross expenditure figures above, these figures represent the direct economic impact of events on the local economy outside the Stadium and exclude spectator expenditure inside Wembley Stadium).
48. By contrast, the direct economic impact to the local area associated with hosting 29 Tottenham Hotspur fixtures during the 2017/18 season averaged £26 per head, comprising accommodation (£10), food and drink (£8), travel (£5), retail (£2) and miscellaneous other shopping (£1). The average direct economic impact for the Tottenham Hotspur events and other matches hosted by The FA, was £31 per head.
49. The higher direct economic impact associated with non-sporting events was due to a range of factors, including longer dwell times in and around the Stadium and greater numbers of long distance domestic and international visitors, resulting in longer trip durations and more overnight stays. In particular, average expenditure per head was 120% higher for accommodation (£22 compared to £10) and 50% higher for food and drink (£12 compared to

£8).

50. Concerts were also found to attract higher numbers of first-time visitors, and so were particularly important in bringing new visitors to Wembley (and to London).

Potential effects

51. In assessing the potential impact of the proposed additional 8 major events per year, a baseline was established based on the current number of permitted events, taking into account the proposed removal of the swap provision, and the removal of the distinction between sporting and non-sporting events at the Stadium. In recognising that the proposed event cap of 54 major events per year would exclude European Cup and World Cup events where England or the UK is a host nation, and that the number of association football matches would be restricted to no more than 25 per year, European or World Cup events were excluded from the analysis. Table 3 below sets out the scenarios tested. It should be noted that 'Baseline 1' considers the standard number of permitted events under planning reference 20/4197, and 'Baseline 2' is a scenario where the swap provision is maximised, increasing the number of major sporting events to 25 per year while decreasing the number of non-major sporting events to 18.

Table 3: Potential effects: scenarios tested (source: Environmental Statement)

Event type	Existing permitted events		Proposed events
	Baseline 1	Baseline 2	
Major sporting	22	25	54
Major-non sporting	24	18	
Non-major	Unlimited	Unlimited	Unlimited

Staffing

52. The data in Table 4 below indicates that on average, between 4,150 and 5,500 staff are required to host a major event. Therefore, the number of event day staff required as a result of the uplift of an additional 8 major events at the Stadium per year could support between 33,200 and 44,000 additional event staff positions..

Table 4: Staff required at proposed additional events (source: Environmental Statement)

	Number of staff required at major events		Staff required at proposed additional events	
	Lower bound	Upper bound	Lower bound	Upper bound
Event stewards	1,650	2,000	13,200	16,000
Catering staff	2,500	3,500	20,000	28,000
Total	4,150	5,500	33,200	44,000

53. The proposal would thereby represent an uplift of between 16.4% and 17.0% on the number of event staff positions that could be supported under the existing permitted events (see Table 4)

Table 5: Comparison of staff required at permitted events under baseline and the Proposal (source: Environmental Statement)

	Average staff required at existing permitted events		Average additional staff under proposed variation		
	Baseline 1	Baseline 2	Additional staff	% uplift against Baseline 1	% uplift against Baseline 2
Event	93,075	85,225	14,600	15.7	17.1

stewards					
Catering staff	142,000	141,500	24,000	16.9	17.0
Total	235,075	226,725	38,600	16.4	17.0

Expenditure

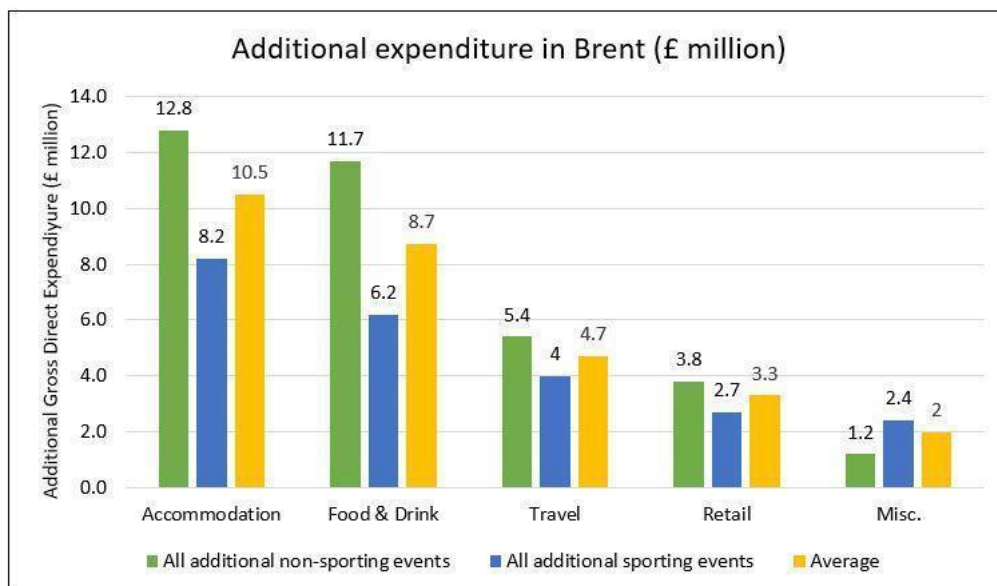
54. The average attendance at major events (both sporting and non-sporting) in 2022 and 2023 was 78,500. Hosting an additional eight major events at the Stadium, as per the proposed variation, would result in an estimated 628,000 additional attendees per year. This would represent an uplift of almost a third on the total attendance across all events at the Stadium in 2023 of 1,974,000. Hosting additional attendees will result in increased expenditure at the Stadium and within the local area.
55. As highlighted above, during the 2017/18 season the direct economic impact to the local area associated with hosting events staged by organisers other than The FA and Tottenham Hotspur, of which there were 17 in total, averaged at £45.73 per visitor on accommodation, food and drink, and other services within Brent. The equivalent figure for major sporting events was £30.89. Inflated to 2023 values, average expenditure at major non-sporting and sporting events at the Stadium is £55.48 and £37.48, respectively.
56. Based on each of the proposed 8 additional major events attracting an attendance in keeping with the average attendance of major non-sporting events at the Stadium in 2022 and 2023, the proposed variation would support additional direct expenditure in the local area in the order of £34.8 million. If these additional events were instead all sports fixtures, the additional direct expenditure would be in the region of £23.5 million, implying that an equal split between sporting and non-sporting events would generate additional direct expenditure of approximately £29.2 million.
57. The potential impact of the proposed additional major events against the number of staff that could be supported under Baselines 1 and 2 is shown in Table 5 below. As indicated, the proposed variation would therefore represent an uplift of between 16.4% and 18.2% against the expenditure that could be supported under the existing permitted events.

Table 6: Additional direct expenditure from the Proposal and uplift over baseline scenarios (source: Environmental Statement)

	<i>Existing permitted events</i>		<i>Additional proposed events</i>		
	<i>Baseline 1</i>	<i>Baseline 2</i>	<i>Net additional expenditure</i>	<i>% uplift against Baseline 1</i>	<i>% uplift against Baseline 2</i>
Average expenditure	£178.1m	£160.8m	£29.2m	16.4	18.2

58. The socio-economic assessment also indicates (see Figure 1) that on reviewing the potential breakdown of additional spending from the proposed variation to the Event Cap and removal of the swap provision, the greatest share of economic benefit from the additional events would be experienced by the accommodation and food and drink sectors, which would together receive between £14.4m and £24.5m in gross additional revenue per annum. However, these figures represent the total impact if all of the proposed events took place in a given year, which is considered unlikely.

Figure 1: Direct economic impact (source: Environmental Statement)



59. Whilst officers consider these economic benefits would have a positive impact on the local economy of both Brent and the wider area, it is also acknowledged that some types of business may lose trade on event days as the congestion and high level of general activity may discourage some economic activity. For example, a dry cleaner or travel agent may be unlikely to see a benefit, and possibly a fall in trade as people decide to visit on a non-event day instead.

Employment and Training

60. Aside from the visitor spending considerations, it is also noted that Wembley Stadium is a key employer in the local area. Table 4 above indicates that, on average, a total of up to 38,600 additional staff will be required to host a major event at the Stadium. The hosting of additional events would therefore enhance employment opportunities for many local people.

London Living Wage

61. The FA pays the London Living Wage (LLW) to all full-time staff. With the previous application it committed to extending this to include event day temporary staff contracted via WNSL suppliers, specifically stewards and cleaning staff, before the end of the 2021/22 season. This has been achieved, with the FA confirming that all staff, whether employed directly or via their event day contractors are paid the LLW as a minimum. The FA has identified a range of initiatives to support employability and is looking to develop its entry level and apprenticeship opportunities.

Employment and Skills Plan

62. With the previous application, the FA committed to agreeing an Employment and Skills Plan with relevant officers at Brent Council. A formal Employment and Skills Plan has not been in place previously, although the Stadium have worked with the Council on a range of initiatives over the years. The Employment and Skills Plan would again set out how WNSL would work with the Council and Brent Works to maximise employment opportunities and enhance employability skills for the residents of Brent with the aim of maximising the opportunities for

Brent residents to enter into apprenticeships and training programmes.

Summary

63. The proposal is expected to provide additional socio-economic benefits above those already generated by the Stadium. In particular, the removal of the swap provision would enable the Stadium to host a greater number of non-sporting (typically music) events, which provide greater economic benefits than sports matches. Concert attendees tend to travel longer distances and stay longer in the area, and hence generate higher levels of expenditure.
64. While the employment and visitor expenditure effects assessed above are beneficial, within the context of the existing economic impact of the Stadium on the local economy they are not significant in EIA terms. The impact on the local labour market (employment) is negligible, while the increased visitor expenditure is a minor beneficial to the local economy in Brent.

Transport

Policy and Context

65. London Plan Policy T1 sets a strategic aim for all development to make the most effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are appropriately mitigated, as also sought by London Plan Policy T4, which further advises that the cumulative impacts must also be considered.
66. Local Plan Policy BT1 seeks to promote sustainable pattern of development in the borough, minimising the need to travel and reducing the dependence on private motor vehicles.
67. The Stadium and its concourse do not have a single public transport accessibility level ('PTAL') associated with it. The areas to the south and east have a PTAL of 2, while areas to the west and north have a PTAL of 4, increasing to 5 as it opens out onto Olympic Way. The Stadium is within walking distance of the following public transport hubs:
68. Wembley Park Station (580m north of Stadium) comprising:
- Jubilee underground rail line
 - Metropolitan underground rail line
 - Wembley Stadium Station (310m south-west of Stadium) comprising:
 - Chiltern Railways rail line (linking London Marylebone and Birmingham (via Buckinghamshire and Oxfordshire stations))
 - Wembley Central Station (1.1km south-west of Stadium) comprising:
 - Bakerloo underground rail line
 - London Overground, running between London Euston and Watford
 - London Midland Railways Line, which links London Euston to Tring

- Southern Railways Line, which links Milton Keynes Central to East Croydon
- There are also 50no. bus stops within a 20-minute walk, providing access to 18no. bus services.

Existing Transport Mitigation

69. Brent Council, transport operators and WNSL together provide a number of event day transport mitigation measures, including the following:

70. Additional services are provided on the London Underground Metropolitan line and Jubilee line from Wembley Park Station;

- Chiltern Rail provide an enhanced service frequency at Wembley Stadium Station;
- Brent Council operate the Wembley Stadium Protective Parking Scheme ('WSPPS') which activates 33 event day Controlled Parking Zones ('CPZ');
- Retention measures are implemented at the end of an event aiming to extend the period over which spectators depart the Stadium; and
- Joint funding and working to shut down illegal 'pirate' car parks in the area around the Stadium.
- Private hire management scheme and trusted parking scheme implementation

Key Highway Considerations

- Planning permission for Wembley Stadium was originally granted in 2002 following completion of a s.106 Agreement and subject to a number of conditions aimed at minimising the impact on local transport networks. These included funding of a Controlled Parking Zone, transport infrastructure improvements and a Travel Plan.
71. Two key requirements for infrastructure included improvements to Wembley Park station and to the road corridor between the Stadium and North Circular Road, with a financial contribution of up to £3m being secured towards the latter through the s.106 Agreement.
72. In order to ensure that these major pieces of transport infrastructure would be in place to facilitate the hosting of major events on a regular basis, a condition was applied to limit the number of events with a capacity above 51,000 (the capacity of the lower and middle tiers) to 37 (22 sporting and 15 non-sporting, or up to 25 sporting and 13 non-sporting, unless England were a host nation for a major international football tournament), until such time as the infrastructure was completed.
73. The works to increase the capacity of Wembley Park station were completed in 2005/6. These improvements enable 50,000 users to travel through the station in an hour, thus allowing Stadium visitors on Underground services to disperse the area relatively quickly after an event and thereby encouraging public transport use and helping to maintain a high modal share by public transport.
74. Initial works to construct the Estate Access Corridor (connecting Hannah Close with Atlas

Road) and the Stadium Access Corridor along Great Central Way between Drury Way and Fourth Way were undertaken between 2003-2006, at a cost of about £16m. This included Wembley Stadium's s.106 financial contributions.

75. However, concerns over the high cost of the final western length of the Stadium Access Corridor between Fourth Way and the Stadium (Gate 5) entrance at First Way, which would have involved extensive compulsory land take, as well as security concerns over its alignment, meant that the last section of the scheme was placed in abeyance and thus remains uncompleted. As such, the cap on event numbers remains applicable.
76. A study was subsequently undertaken by consultants on Brent's behalf in 2012 to re-examine the highway network and bridge options for the area to the east of Wembley Stadium. This identified alternative proposals, which would retain South Way on a similar alignment as at present (as opposed to constructing a new widened and straightened route), but with widening to provide cycle lanes which could be converted to a third traffic lane with tidal flow when required on Stadium Event days.
77. The remaining one-way streets around Wembley Industrial Estate (First Way, Second Way, Fourth Way and Fifth Way) were also recommended to be converted to two-way flow, with junction alterations where necessary, in order to provide an access route into the area along Fifth Way at all times for local businesses and residents, that is clear of the main car and coach park ingress and egress route along South Way.
78. These revised proposals were incorporated into Brent's Wembley Area Action Plan, which was adopted at Full Council in January 2015. As such, the final section of the Stadium Access Corridor as originally envisaged will not now be constructed and alternative proposals are being pursued instead.
79. Works to convert Fourth Way and Fifth Way to two-way operation were completed in April 2020. These works complement the opening of the new Pink car/coach park on South Way and allow event traffic to and from Pink car/coach park to be quickly loaded and dispersed directly to and from North Circular Road via South Way and Great Central Way, without having to traverse First Way, Fifth Way and Fourth Way.

In turn, the introduction of two-way traffic flow on those streets allows unfettered access by local residents and businesses to the area to the northeast of the Stadium (i.e. North End Road etc.) at all times, even during the event traffic dispersal period. This contrasts with the difficulties local residents and businesses previously experienced accessing their properties, particularly after events when they would have to traverse heavily congested roads to reach their destination.

80. The final stage of the Wembley Industrial Estate works will involve the conversion of the final length of South Way (between the Pink car park and the Stadium) and First Way to two-way working. These works cannot proceed until land is secured from the Access Self-Storage site as part of its redevelopment though, so this is in abeyance at present. However, it is not essential to the highway operations on Wembley Stadium event days and the works that have already been carried out are sufficient to meet the original aspirations for the Stadium Access Corridor, at least in relation to the Pink car/coach park.
81. One further change to the car/coach parking arrangements did occur with the scheduled opening of the Green/Blue car/coach park adjoining First Way in July 2021. This replaced the

Yellow car/coach park on Engineers Way and ensures that all parking on the eastern side of the Stadium can be accessed directly from South Way. Traffic from this car/coach park is dispersed either via Fifth Way/Fourth Way or via South Way (once the pedestrian flow back to the Pink car/coach park has subsided) after events. This will again be of assistance in retaining a clear route for residents and businesses into the area after Stadium events.

82. As such, the recent alterations to the car and coach parking arrangements and highway network on the eastern side of Wembley Stadium, which allow Stadium traffic and local residential/business traffic to be kept largely separate, meet the aspirations of the original planning permission to provide a high quality highway arrangement for Stadium parking that minimises disruption to the local community. The original reasons for the event day cap have therefore now been largely addressed and there are no longer any highways concerns in principle with the event cap being eased.
83. It should be noted that other traffic management arrangements on the western side of the Stadium on event days will also need to continue, which include a number of road closures to maintain pedestrian safety to and from stations. These typically operate as follows:
 84. **South Way:** closure between First Way and Wembley Hill Road from four hours before the start of the event until 60-90 minutes after the event
 85. **Fulton Road:** closure between Empire Way and Rutherford Way for up to 2 hours before the start of an event and for up to 90 minutes after an event
 - **Engineers Way:** closure between Empire Way and Rutherford Way for up to 90 minutes after an event
 - **Wembley Hill Road:** closure between Empire Way and Harrow Road for up to 90 minutes after an event
 - **London Road:** closure between High Road and Wembley Central Square car park entrance for up to 3 hours during and after an event.
- These road closures are all concerned with protecting the safety of the high volumes of pedestrians arriving at and leaving the Stadium, particularly to and from stations, so would all continue to be required even if the Stadium Access Corridor were completed.
- As such, whilst it is recognised that the hosting of events at the Stadium does lead to congestion in the area before and after events, the highway works that have now been completed minimise the resultant disruption to residents and businesses in the area by keeping the bulk of event day traffic separated from local traffic.
86. Brent's Highway Network Management team have therefore confirmed that, subject to the meeting of their operational costs, the additional events proposed at the Stadium can be effectively managed.
87. It should be noted that in addition to increasing the maximum number of major events at the Stadium to 54, this application also proposes to raise the threshold at which an event is deemed to be a 'major' event from 51,000 to 60,000+ attendees. The cap of 51,000 was originally set on the basis that this reflected the capacity of the lower two tiers of the Stadium, so that a major event could be easily defined as one where the upper tier is in use. The

Stadium contends that the increased flexibility that electronic ticketing and turnstiles offer overcomes the need to relate the capacity threshold to the use of certain areas of the stadium.

88. Nevertheless, no other particular reason has been given for increasing the threshold from 51,000 to 60,000, as ultimately it is simply a number. In reviewing attendance levels over the last three years, no events were held that had between 51,000 persons and 60,000 persons. Notwithstanding, while it needs to be borne in mind that approval of this application could actually increase the maximum number of major events per year from 46 to 54 in addition to a potentially unlimited number of events of between 51-60,000, rather than simply from 46 to 54, this does not affect the number of events that the Stadium can hold, just the capacity of the crowd. Unlimited events with up to 51,000 attendees can already take place within the terms of the existing planning consent.
89. Although traffic associated with Stadium events can continue to be effectively managed in future, Brent's Highways Service do require the following measures to be provided in addition to existing long-standing obligations:
 90. A requirement for Wembley Stadium to cover Brent Council's costs of maintaining the Hostile Vehicle Mitigation ('HVM') equipment that has been installed around the Stadium in recent years. At present, the maintenance costs amount to approximately £60,000 per annum, but the Stadium would need to fully fund this cost, regardless of any price increases in future, as the measures are primarily in place for the purpose of protecting crowds for the Stadium;
 91. To contribute to the cost of a transport review and subsequent improvements with a focus on gaps in HVM, routes to and from Wembley Central, pick up and drop off points and parking pressures in hot spots and / or residential areas (estimated £100k – not including the cost of works)
 - (i) To contribute to the upgrade of two-way radio and public space CCTV systems directly used for event operations delivery (£280k)
 - (ii) To support the proposal, an Environmental Impact Assessment has been submitted, with a Transport Chapter. However, the conclusions of the report are based upon the marginal impact of eight extra events on average annual traffic and public transport flows, which does not give an accurate indication of impact on an event day.
 - (iii) Nevertheless, based upon the survey information that has been supplied in the Travel Plan, the modal share by car averages 6%-7%, with 78%-88% travelling by public transport. The high level of public transport use is welcomed, but it is noted that the survey data relates to events from 2018. Given that there are anecdotal reports that the modal share by car may have increased since the onset of the Covid pandemic, updated surveys need to be undertaken at the earliest opportunity to gain a clearer understanding of the current modal split figures. The previously secured Travel Plan for the Stadium can then be updated as necessary to support the proposed hosting of additional events at the Stadium.

Spectator Travel Plan

91. To help to manage travel to and from the site by modes other than the car, the applicant has submitted a Spectator Travel Plan ('STP'), which has the primary objective of facilitating sustainable travel to and from the Stadium for all events. This is in line with Event Day

Spectator Travel Plan Published in 2018 and December 2020. STP targets are measurable goals by which progress can be assessed. All targets should be reviewed through a programme of monitoring to ensure they remain SMART (Specific, Measurable, Achievable Realistic and Timed).

92. Within the STP, the average mode share for event spectators, derived from data obtained from the Stadium between 1st May 2017 to 1st May 2018 as per the 2020 Spectator TP, from England International football matches, other football matches (excl. THFC football matches), THFC football matches, concerts, rugby matches, and NFL games undertaken at the Stadium during this time. These mode shares were retained as it is still considered to be reflective of current and likely future mode shares (see Table 6 below).

Table 7: Modal share of the 2020 ES (source: Environmental Statement)

Major Sporting Event Mode Share							Major Non-Sporting Event Mode Share
	England Intl Football	Other Football	THFC Football	Rugby	NFL	Average	Concerts
Car	7.2%	7.2%	7.0%	7.9%	4.7%	6.80%	6.4%
Coach	5.1%	8.8%	2.7%	28.9%	2.5%	9.60%	2.7%
Motorcycle	0.0%	0.0%	0.0%	0.0%	0.0%	0.00%	0.0%
Blue Badge	0.2%	0.4%	0.4%	0.5%	0.0%	0.30%	0.2%
Minibus	0.4%	0.5%	0.2%	0.3%	0.0%	0.28%	0.0%
Mainline rail, LU, LO	86.9%	81.2%	80.5%	58.0%	84.2%	78.16%	75.7%
Other	0.2%	1.9%	9.2%	4.3%	8.6%	4.84%	15.0%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

93. It is anticipated that the proposed variation in event cap will result in the following future case scenarios illustrated in Table 7:

Table 8: Modal share future case scenarios (source: Environmental Statement)

	Major Sporting Events – Spectator Mode Targets			Major non-Sporting Events – Spectator Mode Targets		
	Mode split 2018/24	Target 2025	Target 2030	Mode split 2018/24	Target 2025	Target 2030
Car	6.80%	5.20%	4.90%	6.40%	5.1%	4.9%
Coach	9.60%	10.40%	11.20%	2.70%	3.5%	3.9%
Motorcycle	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Blue Badge	0.30%	0.30%	0.30%	0.20%	0.2%	0.2%
Minibus	0.28%	0.28%	0.28%	0.00%	0.00%	0.00%
Mainline rail, LU, LO	78.16%	79.16%	80.0%	75.5%	77.0%	77.6%
Other	4.84%	4.66%	3.42%	15.0%	14.2%	13.4%
Total	100.0%	100.0%	100.0%	100.0%	100.0%	100.0%

94. The travel plan coordinator ('TPC') will oversee the monitoring and review of the STP to ensure that the document reflects the changing requirements of the Stadium and is up to date

with the travel planning options available. Wembley Stadium will ensure suitable funding for the STP to ensure that the future commitment and ongoing monitoring and review can be achieved. The event category mode share targets will be reviewed in 2026 (1 year review) and 2029 (3 year review), with reports being submitted to the council following each review. Any such report will also include:

95. Up-to-date mode share in order to assess evolution and target achievement;
96. Suggested target amendments if applicable;
 - Spot count of cycle parking use on a few event days; and
 - Updated action plan showing measure already implemented and future measures.
- The STP is a live document that is intended to be regularly monitored and reviewed through the appointed TPC and regular meetings with Wembley Stadium event operation staff. It is anticipated that appropriate measures will be taken to secure and enforce the STP in order to ensure regular monitoring and review of the proposed targets and measures.

Noise

- The NPPF seeks to avoid noise giving rise to significant adverse impacts on health and quality of life. The PPG provides further guidance on this, noting that it is necessary to consider whether or not an adverse or significantly adverse impact is likely to occur, and whether or not a good standard of amenity can be achieved.
97. Policy D14 (Noise) of the London Plan seeks to manage noise, recognising the link to health and quality of life. It also seeks to minimise adverse noise impacts of new development without placing unreasonable restrictions on existing noise-generating uses. Where noise-sensitive development and noise sources are not separated, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.
 98. Policy DMP1 of the Local Plan seeks to ensure that development will not result in unacceptable exposure to noise and general disturbance.
 99. The original planning permission included conditions relating to noise. Condition 5 restricted events utilising amplified sound (except for the public address system) taking place on the outer concourse of the Stadium. Condition 11 required that details of the public address system were submitted for approval prior to the use of the Stadium commencing. Condition 14 required details of the Stadium in-house distributed sound system to also be submitted. Therefore, noise impacts were considered previously and the measures that these conditions required remain in place. As with the previous application, the proposal is slightly different to many noise issues insofar that it is less about the overall impact of the noise in isolation, and more about the frequency that nearby receptors are exposed to it.
 100. A Noise Assessment has been undertaken and submitted alongside the application as part of the Environmental Statement. The Assessment considers the key noise impacts:
 101. Operational effects: noise from music noise breakout from the Stadium during an event; and

102. Road traffic: noise impacts from the potential increase in traffic flows on event days.

- Operational noise from the Stadium due to sporting events is generally lower than for non-sporting (music) events and has a shorter duration. For this reason, the assessment has considered the effect of an increase of 8 non-sporting events (over the existing baseline) as the 'worst case'.
- The noise impact from traffic noise is dependent on the capacity of the event so the comparison has included a non-sporting event with a maximum capacity of 100,000 (as a worse case) although these events are rare.

103. The music noise from the Stadium generated during an event was predicted using environmental noise modelling software. The noise impact from changes in traffic flows was considered in terms of the guidance provided in the Design Manual for Roads and Bridges (DMRB)

104. The submission asserts that factors that should be considered when determining the potential effects and whether noise is a concern include the following: -

105. Existing noise climate and cumulative noise from other developments.

106. The use of the Stadium for non-sporting events for many years.

- Very few noise complaints received by the Council in relation to non-sporting events.
- The intermittent nature and relatively short duration of noise from non-sporting events.
- The normal finishing time of events (no later than 11pm)
- The sound insulation requirements for any residential development constructed after the new Stadium.

Operational noise

- The resultant operational noise levels are not dependent on the capacity of the event as the dominant noise source is music i.e., there is no difference in off-site noise levels at an event with 100,000 capacity to that with a capacity of 77,000.
- Members should note that the planning applications which have been granted since the Stadium has been constructed have considered the impact on future residents to ensure that a suitable internal noise environment is ensured through the application of stringent noise mitigation measures. All new residential developments were subject to the additional acoustic requirements of the permitted 'Stage 1 Planning Permission' Development Area (outline permission ref: 03/3200 29/09/2004), which required that the buildings to be constructed to provide sound insulation against externally generated noise to achieve an internal condition of 38 dB LAeq,15min between 7am and 11pm with windows shut. Therefore, it should be considered that these properties will be adequately protected from noise from all activities associated with the Stadium.

107. Given that there has been a Stadium in this area of Wembley since 1924, and the Stadium

has hosted large scale music events since at least the early 1960's, the character of the noise from the proposed activities in terms of level and duration would be similar to which is experienced currently and has been so for many decades.

108. The applicants conclude that the additional noise created as a result of this application and the events to which it relates would have only a slight impact on residential amenity based on the increase in the number of events. They consider that this impact would only be felt on a limited number of additional events days, and only in a limited radius to the Stadium and therefore the proposed additional events would have only limited noise related implications on nearby residential properties over what is currently experienced.

109. In terms of noise associated with additional road traffic movements, in the period directly before and after an event, the assessment concludes that there would be a negligible noise impact from road traffic noise as a result of the variation to the event cap for events at the Stadium.

Road traffic noise

110. As agreed with officers, the road traffic noise assessment approach is similar to that used in the previous Environmental Statement produced to assess the THFC extension in 2018 and the 2020 Environmental Statement. On balance, the proposals are considered to comply with Policy D14 of the London Plan and Brent's Policy DMP1 by not resulting in unduly adverse noise impacts.

111. The Assessment concludes that the resulting traffic noise changes, should the proposed variation to the Event Cap goes ahead, are negligible to minor in magnitude of impact. The substantial majority of road traffic noise changes are rated as being negligible as they are less than 1 decibel. A single road link is predicted to experience an increase in traffic noise of just over 1 decibel, which is rated as a minor adverse impact, but is below the three decibel or more change that the DMRB advises as the threshold for a significant adverse.

Mitigation and monitoring

112. It is anticipated that there will be a negligible noise impact from road traffic noise as a result of the additional events proposed with the exception of one road link where a minor noise impact is predicted. However, this is a road through an industrial and commercial district where receptors are of low sensitivity to noise. Consequently, no mitigation is required to reduce the magnitude of this impact as the overall effect would be of negligible significance.

113. The addition of an extra 8 major events per year (based on the existing baseline) represents a modest increase of around 17% on the currently permitted number of events. Every non-sporting (music) event is managed to ensure that the music noise levels at noise sensitive locations stay within the permitted levels i.e. are below what might be regarded as a Significant Observed Adverse Effect Level and are mitigated and minimised as per adopted Policy.

In addition, the substantial majority of the year there will be no large-scale events at the Stadium and when there are, there is a strict curfew at 11pm and the events generally only last around 6hrs. National planning guidance considers factors such as how often, how late, and how long noise may occur for, as important factors to consider in assessing the effects of noise.

114. To avoid significant adverse effects due to noise from non-sporting music events it will be necessary that the noise monitoring and management required by the premises licence, which remains in place so that the Music Noise Level limits are not exceeded.

Summary

115. The following factors have been taken into account when considering the potential noise impact from the proposed additional activities: -

116. The existing noise climate of the area.

117. The current baseline noise levels are similar to those for the old Stadium.

- The use of the Stadium for sporting and non-sporting events for many decades.
 - The likely noise impact from traffic noise associated with the worst-case events (cap 100,000) is not significant in noise terms.
 - The existing Event Cap limits non-sporting events to no more than four consecutive days and there have been very few noise complaints received over the last 10 years of the operation of the Stadium for non-sporting music events, and none have been substantiated.
 - The intermittent nature and relatively short durations of noise from major sporting and non-sporting events.
 - The normal finishing times of the events.
 - The sound insulation requirements for any residential development constructed after the new Stadium.
- Environmental Health have reviewed the Noise Assessment and conclude that they are satisfied that the proposal would not cause any adverse noise impact on residential receptors and traffic generated noise is negligible.
 - Therefore, having regard to the above, the proposals are considered to comply with Policy D14 of the London Plan and Policy DMP1 of the Local Plan by not resulting in unduly adverse noise impacts.

Air Quality

118. With the site located in a designated Air Quality Management Area ('AQMA'), London Plan Policy SI1 and Local Plan Policy BSUI2 (Air quality) require the submission of an Air Quality Assessment ('AQA') to quantify pollutant levels across the site, consider its suitability for the proposed end-use and assess potential construction phase impacts as a result of the proposed development. As a minimum, developments should be Air Quality Neutral but being within a Growth Area, the scheme is also required to be Air Quality Positive.

119. Local Air Quality Management Technical Guidance ('LAQM.TG22') recommends that modelled concentrations should be within 25% of monitored concentrations, ideally within

10%. Where there is a large discrepancy between modelled and measured concentrations, it is considered necessary to adjust the model results to more accurately reflect local air quality.

120. It must be noted that what is being assessed is the uplift in numbers from 45 major events to 54 major events in a year, and the increase of non-major events to up to 60,000 persons.

Potential effects – During operation

121. Predicted annual mean concentrations of nitrogen dioxide in 2025 for existing receptors are set out in Table E5.1 of the Environmental Statement for both the “Without Scheme” and “With Scheme” scenarios. It demonstrates that the annual mean nitrogen dioxide concentrations are below the objective at all receptors, with or without the proposal. Negligible impacts are predicted at all receptors. On the same basis but at Table 5.2 of the Environmental Statement, the predicted annual mean concentrations of PM 10 and PM 2.5 in 2025 for existing receptors indicate that concentrations are below the relevant criteria at all receptors, with or without the proposal. Furthermore, as the annual mean PM 10 concentrations are below 32 µg/m³, it is unlikely that the 24-hour mean PM 10 objective will be exceeded at any of the receptors. The impacts of the Proposal on PM 10 and PM 2.5 concentrations at all receptors are negligible.
122. Table E5.3 of the Environmental Statement presents the same PM2.5 concentrations as Table E5.2 but assess the impacts against the GLA target for this pollutant. The annual mean concentrations of PM 2.5 exceed the GLA target with or without the Proposal. Exceedances of the target are common, and achievement is very unlikely to be possible before 2030. As such, it is unsurprising that there are exceedances. It is, however, clear from Table E5.3 that the Proposal results in a very small contribution to annual mean PM 2.5 concentrations (less than 0.1 µg/m³) and is unlikely to significantly delay achievement of the target.
123. The operational air quality effects without mitigation are considered to be ‘Not Significant’.

Air Quality Neutral

124. An Air Quality Neutral (‘AQN’) development is one that meets or improves upon the AQN benchmarks that set out the maximum allowable emissions of NO_x and particulate matter based on the size and use class of the proposed development. These benchmarks are based on research and evidence carried out by building and transport consultants and are designed to prevent the degradation of air quality from the combined emissions of individual developments. The two benchmarks relate to building emissions (‘BEB’) and transport emissions (‘TEB’). Developments need to meet both benchmarks to be considered AQN.
125. The Mayor’s Air Quality Neutral LPG sets out guidance on when an ‘air quality neutral’ assessment is required and how it should be undertaken, including how the benchmarks should be calculated. Importantly, in relation to ‘material and non-material amendments’, paragraph 2.5.1 of the guidance states:
- “Changes to the design, energy or transport strategy after planning permission has been granted may affect whether a development is Air Quality Neutral. A reassessment of compliance with this guidance will normally be required for amendments to a planning consent that affect any of the following:

126. energy strategy

- the proposed type or number of power and/or heating appliances
 - transport strategy and/or travel plan
 - number of parking spaces
 - parking management plan
 - number of residential units
 - floorspace assigned to non-residential use classes.”
- Paragraph 2.5.2 states that “The reassessment should be proportionate and limited to the extent of the amendments. For example, a change to the number of car parking spaces would not need a reassessment of building emissions. A change that would unambiguously reduce emissions, such as replacing planned domestic boilers with heat pumps, or removing car parking could be allowed on that basis without reassessment at the discretion of the local planning authority.”

127. There is no change in any of the identified considerations including the transport strategy or travel plan, number of parking spaces or floorspace assigned to non-residential use classes. On this basis alone, there does not appear to be any requirement for an assessment. Moreover, paragraphs 2.5.1 and 2.5.2 refer to ‘reassessment’ (of compliance), which would only be possible if there had been an initial ‘assessment’ (of compliance). No such assessment was required or undertaken previously, either for the original application for the redevelopment of the Stadium or in relation to subsequent variations of the Event Cap condition.

128. Given that the planning application for the Stadium was submitted prior to the introduction of the requirement to meet with mandatory AQN benchmarks, no assessment is necessary, and this is supported by Environmental Health.

129. However, to give members some comfort that increasing the major event cap by 8 additional events will not lead to a worsening of air quality, a review of the TEB was provided for information purposes. The TEB for a stadium of 180,000sqm GIA is 8,496,000 trips per annum following the approach described in the GLA’s Guidance. The latest survey data for Wembley Stadium estimates the number of trips per annum to be less than 300,000. The current event cap (with swap provision) allows for between 43 and 46 events (generating around 6,500 trips per event). The total number of events could increase to 54 as a result of the additional major events being sought, which is expected to result in a total of around 330,000 trips per annum, or 3.9% of the benchmark.

Mitigation and monitoring

130. The assessment has demonstrated that the overall air quality effect of the Proposal will be ‘Not Significant’; the development-generated traffic emissions will not have a significant impact on local air quality. It is, therefore, not considered necessary to identify further mitigation measures for the proposal.

131. Notwithstanding, a Spectator Travel Plan has been prepared, which will maintain and

increase travel options to and from the Stadium, encouraging the use of sustainable travel modes, including walking, cycling and public transport. The Stadium benefits from access to three nearby underground stations and is served by a large number of bus stops. Olympic Way is mainly pedestrianised, and there is access to cycle parking both at the Stadium and within the local area, facilitating access by foot and cycle. The majority of trips taken to and from the site are by non-private car modes, which make up less than 7% of trips.

Summary

132. The proposed increase to the event cap is considered to be consistent with Paragraph 191 of the NPPF, being appropriate for its location in terms of its effects on the local air quality environment. It is also consistent with Paragraph 192, as it will not affect compliance with relevant limit values or national objectives.
133. Moreover, the redevelopment of the Stadium pre-dates the requirement for AQN assessment, although as demonstrated above, the TEB would be significantly below its benchmark.

Anti-social behaviour

134. A number of objections cite anti-social behaviour as being a problem with the existing operation of the Stadium, with objectors concerned that additional events at Wembley would further exacerbate the issues they face. Objections have noted rowdy, unruly, and abusive behaviour. Drunkenness, public urination, and litter have all been raised as existing and ongoing problems that can extend beyond the immediate surrounds of the Stadium.
135. Although it is not possible for WNSL to control the behaviour of people when they are some distance away from Wembley, some measures were introduced with the previous application to better manage the situation nearby than are currently in place.
136. Previous agreements have required the Stadium to cover the costs of street cleaning, and this would still apply. A deed of variation ('DoV') would again secure a financial contribution to be paid by the Stadium to Brent Council per additional major non-sporting event. This would go towards mitigation measures as agreed between WNSL and the Council. This could be used to cover measures to address public safety and anti-social behaviour such as additional public toilets, public safety reviews, street trading and to tackle pirate parking.
137. Additional litter bins have previously been provided as part of s.106 obligations. It should also be noted that moneys were provided by the applicant for the 2017/18 season for improvements to the CCTV and security systems deployed around the Stadium, and for additional signage works. WNSL have also agreed to contribute to the necessary upgrading of the two-way radio and public space CCTV systems directly used for event operations delivery.

Mitigation

138. Since the original permission for the Stadium was granted, measures have been sought and secured to mitigate against potential detrimental impacts. Obligations must satisfy Regulation 122 of the Community Infrastructure Levy Regulations 2010 which makes it unlawful for any planning obligation to be taken into account as a reason to grant a planning

permission if it does not meet the three tests set out in the Regulation. The three tests are:

- 139. necessary to make the development acceptable in planning terms;
- 140. directly related to the development; and
- 141. fairly and reasonably related in scale and kind to the development
- 142. Table 9 below sets out the mitigation measures.

Table 9: Table of obligations and level at which they apply

	10k+	51k+	60k+ (up to 46 events)	60k+ (>46 events)
Control of off-site parking including contribution of £3,000 towards parking enforcement measures for major events	N/A	Y	Y	Y
Private hire management scheme and trusted parking scheme	N/A	Y	Y	Y
Up to £1,000 per event for signage maintenance	N/A	Y	Y	Y
Updated Spectator Travel Plan (including Spectator communication)	Y	Y	Y	Y
Event day street cleansing	N/A	Y	Y	Y
Stewarding strategy	N/A	Y	Y	Y
Toilet contribution	N/A	Y	Y	Y
Skills and training	Y	Y	Y	Y
Wembley Park Station contribution of up to £150k for CCTV and/or signage upgrades	Y	Y	Y	Y
Up to £100,000 towards a transport study, based upon a brief to be agreed with LB Brent, and up to a further £200,000 towards any recommended improvements identified within the study	Y	Y	Y	Y
£750 per event towards LB Brent's operational costs for all events with an expected attendance greater than 51,000 persons	N/A	Y	Y	Y
£15,000 towards LB Brent's operational costs for each subsequent major event after Event 46 (if triggered)	N/A	N/A	N/A	Y
Up to £200,000 towards CCTV maintenance/system upgrades around the Stadium	N/A	N/A	N/A	Y
Annual retrospective review meeting	Y	Y	Y	Y

Equalities

- 143. In line with the Public Sector Equality Duty, the Council must have due regard to the need to eliminate discrimination and advance equality of opportunity, as set out in section 149 of the

Equality Act 2010. In making this recommendation, regard has been given to the Public Sector Equality Duty and the relevant protected characteristics (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation).

Conclusions

144. The objections received indicate that there is a level of impact currently experienced by local residents as a result of events at the Stadium, with concerns predominantly focussed on anti-social behaviour, transport issues, air quality and noise. Some impacts are to be expected, given the size of the Stadium and its siting in a location surrounded by residential properties and businesses, within a dense urban area, although it must be remembered that a Stadium has been in situ for over 100 years.
145. The original cap on events was imposed to manage the impacts until such time as specific transport improvements had been made. Whilst most of these have taken place, not all of them have been realised. Circumstances have changed since the original planning permission in 2002, which suggest that the final piece of transport infrastructure (i.e., the Stadium Access Corridor) will not be provided in its originally envisaged form, but other changes to the road network have now taken place. Therefore, the Council considers that the cap remains relevant.
146. Clearly, to increase the number of higher capacity events to accommodate up to 8 additional major non-sporting events per calendar year would imply an increase in the impact. However, a wide range of mitigation measures have previously been secured and would continue to do so to help mitigate these impacts. There are ongoing efforts to reduce the number of vehicles on an event day, including additional parking enforcement capacity and an updated Spectator Travel Plan to promote sustainable travel patterns. WNSL and public transport operators work closely to promote sustainable transport solutions and maximise the efficiency of the network. This in turn contributes to reducing noise and air quality issues.
147. Infrastructure works including two-way working in the area to the east of the Stadium and the opening of a link between the western end of North End Road and Bridge Road to provide an east-west route past the Stadium that is capable of being kept open at all times before and after Stadium events has improved traffic flow in the area and assist residents' movements on event days.
148. The Trusted Parking Scheme aims to ensure authorised car parks are responsibly run in a way that would limit their impact on neighbouring residents and reduce local congestion, whilst the Private Hire Management Scheme would reduce the number of vehicles in the area around the Stadium after events have finished.
149. Employment and Training benefits for Brent residents would also be secured by the proposed scheme.
150. With regard to antisocial behaviour, a financial contribution would be paid by the Stadium to Brent Council per additional major non-sporting event. This would go towards mitigation measures as agreed between WNSL and the Council which may cover measures to address anti-social behaviour.
151. Whilst it is appreciated that local residents face challenges on event days, the direct

economic benefits for the local Brent economy of Stadium events are also recognised, including spending on accommodation, food, drink and other ancillary items within the Wembley area. The uplift in the event cap would also create additional event day steward and catering positions. Whilst some types of business would suffer on event days, many would benefit from the influx of people to the area.

152. In summary, it is recognised that there is a level of impact associated with major events now, and that this would increase with an increase in the number of high capacity major events. However, the measures proposed would ensure that this is moderated as much as is reasonably achievable. All are considered necessary to mitigate the increased number of major events which this application proposes.
153. A further consideration is that the Stadium can already be used for events up to 51,000 without restriction. Existing mitigation measures would be extended to cover this increase. Measures including the training and employment opportunities would apply more broadly to Stadium events, not just the additional major non-sporting events for which permission is sought under this application and would therefore provide wider benefits to local people and the local economy more generally.
154. The proposal is considered to accord with the development plan, having regard to material planning considerations. While there will inevitably be some additional impacts associated with an increase in the number of higher capacity non-sporting events, a range of mitigation measures are proposed and some benefits are also anticipated. The proposal is, on balance, recommended for approval.



Application No: 24/1329

To: Mr Baker
Lichfields
The Minster Building
21 Mincing Lane
London
EC3R 7AG

I refer to your application dated **15/05/2024** proposing the following:

Variation of conditions 1 (Event Cap) and 2 (Temporary Traffic Management) of Variation of Conditions reference 20/4197 dated 21 June, 2021, for Proposed variation of Condition 1 (event cap) of planning permission reference 18/4307 (varied permission for the construction of the stadium, dated 07/03/2019), to allow up to 9 additional major non-sporting events per event calendar year.

Planning permission 99/2400 was for the demolition of the original Wembley Stadium and clearance of the site to provide a 90,000-seat sports and entertainment stadium (Use Class D2), office accommodation (Use Class B1), banqueting/conference facilities (Use Class D2), ancillary facilities including catering, restaurant (Use Class A3), retail, kiosks (Use Class A1), toilets and servicing space; re-grading of existing levels within the application site and removal of trees, alteration of existing and provision of new access points (pedestrian and vehicular), and parking for up to 458 coaches, 43 mini-buses and 1,200 cars or 2,900 cars (or combination thereof).

Application reference 17/0368 granted permission to vary condition 3 (event cap) of consent 99/2400 to allow 22 additional major Tottenham Hotspur Football Club events in between 1 August 2017 and 31 July 2018.

Application reference 18/4307 granted permission to vary conditions 1 (event cap) and 2 (temporary traffic measures) of planning permission reference 17/0368 to allow 8 additional Major Tottenham Hotspur Football Club (THFC) events to May 2019.

The current application includes the submission of an Environmental Statement.

and accompanied by plans or documents listed here:
see Condition 3

at **Wembley National Stadium, Olympic Way, Wembley, HA9 0WS**

The Council of the London Borough of Brent, the Local Planning Authority, hereby **GRANT** permission for the reasons and subject to the conditions set out on the attached Schedule B.

Date: 03/09/2024

Signature:

David Glover
Head of Planning and Development Services

Notes

1. Your attention is drawn to Schedule A of this notice which sets out the rights of applicants who are aggrieved by the decisions of the Local Planning Authority.
2. This decision does not purport to convey any approval or consent which may be required under the Building Regulations or under any enactment other than the Town and Country Planning Act 1990.

DnStdG

SUMMARY OF REASONS FOR APPROVAL

- 1 The proposed development is in general accordance with the:

Revised National Planning Policy Framework 2023
London Plan 2021
Brent Local Plan 2021
Wembley Area Action Plan 2015

- 1 That until the following works are completed to the satisfaction of the Local Planning Authority and written confirmation as such is given to the applicant or owner or occupier:

1. Improvements to Wembley Park Station to achieve a capacity of 50,000 persons per hour and
2. Construction of roads known as the Estate Access Corridor and the Stadium Access Corridor

The number of major events held at the stadium in any one calendar year shall be restricted to no more than 54 (to exclude European Cup and World Cup events where England/UK is the host nation). This shall be described as the cap. Within the event cap, the number of major events involving UK based domestic association football teams shall be restricted to more than 25.

Note: for the purposes of this condition major event means an event in the stadium bowl with a capacity in excess of 60,000 people.

A calendar year runs from 1 January to 31 December

- 2 Temporary traffic management measures shall be provided for no more than 54 stadium events per calendar year, unless a scheme for an alternative number is submitted to and approved in writing by the local planning authority.

Reason: To enable the A406 North Circular Road to continue to be used efficiently as part of the national system of routes for through traffic in accordance with section 10(2) of the Highways Act 1980 and to ensure the continued safety of traffic using that road.

- 3 The development hereby permitted shall be carried out in accordance with the following approved drawing(s) and/or document(s):

As approved under 99/2400

CL/4929/PA1 - Application Boundary Plan

As approved under 06/0206

pa10001 rev 01 Location Plan
pa10002 rev 03 Proposed Demolition Plan, Areas to Regard, Trees to Remove
pa10003 rev 05 Proposed Site Plan
pa10005 rev 01 Existing Site Plan
pa10006 rev 04 Proposed Plan Level B2 +40.50m Lower Basement
pa10007 rev 05 Proposed Plan Level B1 +45.70m Upper Basement
pa10009 rev 05 Proposed Plan Level S0 +52.80m Lower Concourse
pa10010 rev 02 Proposed Plan Level S1 +56.94m Lower Concourse Gallery
pa10011 rev 02 Proposed Plan Level S2 +61.20m Club Concourse
pa10012 rev 02 Proposed Plan Level S3 +66.32m Lower Hospitality

pa10013 rev 02 Proposed Plan Level S4 +70.16m Upper Hospitality
pa10014 rev 02 Proposed Plan Level S5 +75.20m Upper Concourse
pa10015 rev 02 Proposed Plan Level S6 +84.92m
pa10016 rev 02 Upper Deck Level Full Bowl
pa10017 rev 02 Roof Plan - Roof Open
pa10018 rev 02 Roof Plan - Roof Closed
pa10023 rev 02 North/South Sections Facing West
pa10024 rev 02 East/West Sections Facing North
pa10025 rev 03 North and South Elevations
pa10026 rev 02 East and West Elevations
pa10027 rev 02 North West Facade Detail Section and Elevation
pa10028 rev 02 South Facade Detail Section and Elevation
pa10029 rev 03 North West Facade Detail Section and Elevation
pa10030 rev 02 Proposed Bowl Configuration Football and Rugby
pa10031 rev 02 Proposed Bowl Configuration Concert
pa10033 rev 02 Proposed Bowl Configuration Athletics
pa10037 rev 02 Wireframe Perspectives of Bowl
pa10038 rev 02 Wireframe Perspectives of Exterior

Supporting documents submitted under this application

GIS\CL\04929\40-0 Site Location Plan

Covering Letter dated 15 May 2024

Planning Statement dated 15 May 2024

Environmental Statement dated December 2024 comprising:

Volume 1 - Technical Assessments April 2024

- Chapter A – Introduction, Background and Description of the Proposal
- Chapter B – Methodology, Scope and Approach to the EIA
- Chapter C – Socio-Economics
- Chapter D – Transport
- Chapter E – Air Quality
- Chapter F – Noise
- Chapter G – Cumulative Impact Assessment & Summary of Mitigation and Monitoring

Volume 2 – Technical Appendices

Non-Technical Summary

Reason: For the avoidance of doubt and in the interests of proper planning.

- 4 No external lighting shall be installed unless details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full, except that which is part of the lighting scheme approved on 8 April 2014 (reference 14/0804) in respect of condition 7 of planning permission 99/2400.

Reason: In the interests of the safety and convenience of stadium users and the amenities of nearby residents and to avoid light pollution.

- 5 The details of apparatus for the neutralisation of all effluvia from the processes of cooking, including details of the point of extraction approved on 30 July 2004 (reference 04/2355) in respect of condition 13 of planning permission 99/2400. shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full.

Reason: To protect the amenities of the occupiers of adjoining properties.

- 6 The details of the in-house distributed sound system approved on 30 July 2004 (reference 04/2355) in respect of condition 14 of planning permission 99/2400 shall be maintained as approved except with the prior written consent of the Local Planning Authority.

Reason: To protect the amenities of the occupiers of adjoining properties.

- 7 No temporary traffic management shall be provided on event days other than in accordance with a scheme approved by the Local Planning Authority in consultation with the Highway

Authority.

Reason: To enable the A406 North Circular Road to continue to be used efficiently as part of the national system of routes for through traffic in accordance with section 10(2) of the Highways Act 1980 and to ensure the continued safety of traffic using that road.

- 8 The details within the parking management strategy document for the use of on-site parking approved on 20 September 2002 (reference 01/0222) in respect of condition 37 of planning permission 99/2400 shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full.

Reason: To ensure a satisfactory access, egress and parking arrangements without hazard to health and safety.

- 9 The details of the loading and delivery facilities for the proposed stadium approved on 30 August 2002 (reference 01/0223) in respect of condition 38 of planning permission 99/2400 shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full.

Reason: In the interests of the safety and convenience of users and visitors to the site.

- 10 The details of the facilities for the setting-down and collection of patrons to the Stadium by coach, car and taxi, including a programme for the appropriate development of additional off site coach parking facilities if necessary approved on 20 September 2002 (reference 01/0225) in respect of condition 39 of planning permission 99/2400 shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full.

Reason: In the interests of the safety and convenience of users and visitors to the site.

- 11 Unless otherwise agreed in writing by the Local Planning Authority:

- (i) 250 car-parking spaces for the use of the disabled shall be provided for each major event in the location approved prior to each event pursuant to Condition 37 of 99/2400, which was discharged on 20 September 2002 (reference: 01/0222).
- (ii) For all non-major events at least 5% of the parking provision for that event shall be for the use of disabled persons.

The spaces provided shall be a minimum width of 3 metres and shall be provided and retained for the exclusive use of disabled people at all times during the operation of events at the Stadium.

Reason: To ensure adequate provision for the needs of disabled people.

- 12 The details of the cycle provision approved on 9 September 2002 (reference 00/2382) in respect of condition 41 of planning permission 99/2400 shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local Planning Authority and the approved details are thereafter implemented in full.

Reason: To ensure that an adequate provision is made for cycle users in accordance with the strategy submitted by the applicant.

- 13 No event resulting in amplified sound, other than a public address system, shall take place or be operated on the outer concourse of the stadium unless agreed in writing by the Local Planning Authority.

Reason: To safeguard the amenities of residents and other occupiers around the site.

- 14 The details of the management of the toilet provisions approved on 12 March 2007 (reference 06/0206) in respect of condition 46 of planning permission 99/2400 shall be maintained as approved unless alternative details are submitted to and approved in writing by the Local

Planning Authority and the approved details are thereafter implemented in full.

Reason: To ensure an adequate provision for access to toilet facilities in accordance with the strategy submitted by the applicant.

15 Major non-sporting events shall not take place on more than four consecutive days.

Reason: To control the anticipated cumulative effects of consecutive major non-sporting events.

INFORMATIVES

1 For the avoidance of doubt, the use of the Stadium for education purposes (Use Class D1) granted by planning permission 13/1945 is unaffected by this planning permission.

Any person wishing to inspect the above papers should contact Sean Newton, Planning and Regeneration, Brent Civic Centre, Engineers Way, Wembley, HA9 0FJ, Tel. No. 020 8937 5166