

## London Borough of Richmond Upon Thames

### EIA Screening Opinion Review

**Site: Allianz Stadium, 200 Whitton Road, Twickenham**

#### 1. Proposed Development

The Proposed Scheme is to increase the number of major non-sporting event days at Allianz Stadium from the existing 3 per annum (and limited to concerts only) to 15 per annum. A major non-sporting event will include set up days (up to five days) for the erection and provision of equipment and infrastructure; activities (e.g. music, shows and rehearsals) within the bowl of the stadium; and take down days (up to three days) for the dismantle and removal of equipment and infrastructure following the event.

The maximum capacity for these major non-sporting event days is proposed to be increased from 55,000 to 75,000 spectators.

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

The maximum number of consecutive events is proposed to be up to 4 consecutive days. There will be no more than 4 consecutive major non-sporting event days in any two-week period across all years.

A staggered introduction is proposed up to the maximum number of major non-sporting events, as follows:

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

The associated planning application is seeking full planning permission for the above as a 'change of use' and not a variation to the existing planning permission.

#### 2. EIA Screening Approach

The project is proposed under The Town and Country Planning (Environmental Impact Assessment) (as amended) Regulations 2017 regime.

#### 3. Consultation

Consultation has been carried out. The responses are summarised below.

LBRUT	
Environmental Health (Noise, Air and Waste)	Comments included
Policy (Socio-economic)	Scoped out
Biodiversity	Scoped out

Transport	Comments included
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External Consultees	
South Western Railway	Comments included
Network Rail	
Transport for London	

#### 4. The EIA Regulations Threshold

A screening exercise has been undertaken in accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). The Local Planning Authority (LPA) has had regard to the above regulations in addition to National Planning Practice Guidance (NPPG) when undertaking the screening exercise. The EIA Regulations define ‘EIA Development’ in Regulation 2(1) as either

- Schedule 1 development; or
- Schedule 2 development likely to have a significant effect on the environment by virtue of its size, nature or location.

The development is not a Schedule 1 development.

If the project is listed in Schedule 2, the LPA should consider whether it is likely to have significant effects on the environment. “Schedule 2 development” means development, other than exempt development, of a description mentioned in column 1 of the table in Schedule 2 where—

- a) any part of that development is to be carried out in a sensitive area; or
- b) any applicable threshold or criterion in the corresponding part of column 2 of that table is respectively exceeded or met in relation to that development;

“sensitive area” means:

- a) *land notified under section 28(1) (sites of special scientific interest) (SSSI) of the Wildlife and Countryside Act 1981;*
- b) *a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;*
- c) *the Broads;*
- d) *a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;*
- e) *a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;*
- f) *an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State;*
- g) *a European site;*

I can confirm that the Local Planning Authority is of the view that the proposed development is not within a sensitive area.

The applicable thresholds and criteria of Urban Development Projects as outlined in Schedule 2 Part 10(b) are:

- (i) The development includes more than 1 hectare of urban development which is not dwellinghouse development; or
- (ii) the development includes more than 150 dwellings; or
- (iii) the overall area of the development exceeds 5 hectares.

The site exceeds 1 hectare and therefore falls within Schedule 2 Part 13(b) for the purpose of the EIA Regulations.

The proposal therefore needs a screening opinion to determine whether the proposed development is likely to have significant effects on the environment and whether an Environmental Impact Assessment (EIA) is required.

**5. Regulation 6 of the EIA Regulations**

Regulation 6 (2) sets out the necessary information the person making a Screening Opinion request must provide. The submission document prepared by Turley Ltd titled ‘Environmental Impact Assessment (EIA) Screening Report, dated May 2025, that accompanied the screening opinion request is deemed to conform with the following requirements:

Regulation 6 Requirement	Conformity
<i>a) a plan sufficient to identify the land;</i>	Yes Included as Figure 1 to the report.
<i>b) a description of the development, including in particular— (i) a description of the physical characteristics of the development and, where relevant, of demolition works; (ii) a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;</i>	Yes The Turley Report includes a detailed description of the development and the site location (Pages 5 to 10).  It is noted that the Turley Report did not identify the site is being subject to the Duke of Northumberland’s River (DoNR) SINC. However, this was assessed within the additional information received (discussed below).
<i>c) a description of the aspects of the environment likely to be significantly affected by the development;</i>	Yes An appraisal of environmental effects is set out from Pages 13 to 18 of the Turley Report.  As above, the DoNR SINC was not identified in the Turley

	Report, but subsequently assessed.
d) <i>to the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from—</i> (i) <i>the expected residues and emissions and the production of waste, where relevant; and</i> (ii) <i>the use of natural resources, in particular soil, land, water and biodiversity; and</i>	Yes Included in Table 1.1 of the Turley Report.
e) <i>such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.</i>	Yes The Turley Report includes mitigation measures pertaining to transport and noise impacts. This also includes measures to manage crowds at Twickenham Station and other key transport routes.  The Turley Report notes that the traffic mitigation measures also represent a benefit to local air quality.  No other mitigation measures are clearly set out in the Turley Report or the further information received.

A request for additional information under Regulation 6, Paragraph 5 of the EIA Regulations (2017) was issued to the Applicant on the 12 June 2025 and 17 June 2025. The information requested can be summarised as follows:

- Additional information relating to the potential negative socio-economic effects of the proposal.
- Assessment of the DoNR SINC.
- Additional information relating to the following transport matters:
  - Details on shuttle bus services
  - Details on events starting
  - Arrival profiles during weekdays, Fridays, Saturday and Sundays
  - Data modelling of other similar venues
  - Estimated numbers of people using Twickenham station and the direction of travel before and after an event
  - Model of station distribution for concerts
  - Details on the data of mode share info for concerts

- Information about how the estimates for the net impact of vehicular trips generated by the development on the four links was derived and regarding the forecast number of HGV trips per event.

## 6. Screening Opinion

Regulation 5(4) of the EIA Regulations and the NPPG require the LPA to consider the screening criteria set out in Schedule 3 of the EIA Regulations (listed below), however, the NPPG notes not all criteria will be relevant and each case should be considered on its own merits in a balanced way:

1. Characteristics of development
2. Location of development
3. Type and characteristics of the potential impact

To aid LPAs to determine whether a project is likely to have significant environmental effects, the NPPG at Column 4 sets out an indication of the types of impact that are most likely to be significant. Of relevance to this Development are:

- Increases in traffic
- Increases in noise
- Increases in emissions

Whilst any development will have an impact on the environment, which will be considered against the Development Plans and guidance, for the purpose of this Screening Opinion, consideration is given to whether the development is likely to give rise to significant environmental effects in the context of the EIA Regulations.

When the LPA issues its opinion, it must state the main reasons for the conclusion with reference to the relevant criteria listed in Schedule 3.

### 6.1. Characteristics of development

The characteristics of development must be considered with particular regard to:- (a) size and design of the whole development; (b) cumulation with other development; (c) use of natural resources; (d) production of waste; (e) pollution and nuisances; (f) risk of accidents; (g) risk to human health.

(a) the size and design of the whole development;

The existing site comprises the existing and operational Allianz Stadium, a large venue hosting mainly international rugby events. In terms of non-sporting events, these are limited to a concert use with current planning permissions allowing up to three concerts per calendar year between June – October (inclusive). There is no restriction on what day of the week the concert can be held. The maximum capacity for each concert is 55,000, historically held during the weekends, with the Turley Report and additional information referring to only two concerts being held during the week, being The Rolling Stones on Tuesday 2018 and Metallica on Thursday 2019. Attendance levels for these events are not provided.

The stadium can also host an unrestricted number of sports events throughout the year at a capacity of 82,000. It is however noted that there is no recorded sporting event during a weekday at maximum capacity with the exception of the opening game for the 2015 Rugby World Cup.

For the existing events at the Allianz Stadium, an event-day transport strategy is implemented that includes measures such as temporary road closures, restricted parking zones on event days (triggered by crowds of >30,000 attending events at Allianz Stadium managed via a Traffic Management Order), stewarding, traffic management, shuttle bus services, and enhanced public transport operations. Specific details on these interventions are not provided in the submitted documents.

(b) cumulation with other existing development and/or approved development;

The EIA Regulations require consideration of cumulative effects of the proposed development with other existing and approved developments. The submitted documents advises that the Applicant has considered the cumulative impacts.

Although the wider context to the site is predominately residential development, nearby sites are more mixed and include a sewage treatment plant, retail superstore, storage units and a primary school. There are a number of other planning applications nearby. These are identified in Section 7 of the Turley Report, and include:

- *22/3004/FUL - The demolition of existing modern buildings on the site and the conversion of and extensions to Kneller Hall and other ancillary buildings associated with the former royal military music school to a day school (Use Class F1), together with the construction of associated new purpose-built buildings including teaching space, indoor sports facilities, sporting pavilion and forest school building. Alterations to the existing playing fields, to include an all weather pitch with fencing and floodlighting, flood lighting to existing tennis courts, sustainability measures and re-turfing. Provision of a new access from Whitton Dene, and other ancillary works including parking areas, hard and soft landscaping, lighting, access alterations and energy centre. Internal and external alterations to Kneller Hall and the curtilage listed buildings to facilitate the day school use, including demolition and rebuilding of single storey extension to the west wing of Kneller Hall, extension to the Band Practice Hall and re-opening of Whitton Dene site entrance.*

This case is pending determination, noting that planning committee delegated authority to approve the case to Council Officers subject to a s106 legal agreement being finalised.

- *22/1168/FUL - Alterations and extension to existing Sports Hall including associated landscaping within the Tech Hub Development Zone to replace Tech Hub building as defined under application 15/3038/OUT (as amended), and erection of Sports Hall with associated car parking, landscaping, and other works within the Main College Development Zone including erection of a Science, Technology, Engineering and Maths (STEM) building as approved under application 19/2517/RES (as amended), retention of*

*existing Main College building as approved under application 16/4747/RES (as amended), and associated on-site parking (non-residential) and access roads. Both Sports Halls to serve the college, schools and wider community. (Application accompanied by an Environmental Statement).*

This scheme is located 150m south of the site and was initially the subject of an outline parameter application 15/3038/OUT. This was considered EIA development, was granted outline consent and is now under construction. This consent reserved all matters bar access and includes significant highway works to the A316 Chertsey/Road/Langhorn Drive junction and other infrastructure works to the surrounding road network. The highway works have yet to be commenced. The outline consent is not referred to within the Turley Report and it is unclear whether the forthcoming highway works have been taken into account when considering the transport impacts of the Proposed Development. 22/1168/FUL is a 'drop-in' application which solely relates to 2 new sports halls in 2 of the Development Zones as defined under 15/3038/OUT.

- *21/3136/FUL - Demolition of existing college buildings, removal of hard-surfacing, site clearance and groundworks together with the redevelopment of the site to provide new residential units; together with associated parking, cycle parking, open space and landscaping.*

This scheme is located 360m south of the subject site, was considered EIA development and is under construction. As per 22/1168/FUL, this is solely a 'drop-in' application relating to the Residential Development Zone as defined under 15/3038/OUT.

(c) the use of natural resources, in particular land, soil, water and biodiversity;

The Site has limited existing biodiversity value from the grassed areas within the Stadium perimeter and adjoins the Duke of Northumberland's River SINC. No habitat removal or alterations are proposed.

The Site will continue to be mainly hardstanding and drain by existing mechanisms so there will be no effect on land soil or water resources. The development is for a change of use and will benefit from the de minimis exemption from Biodiversity Net Gain requirements.

In terms of biodiversity, there is potential for adverse impacts from increased artificial lighting at night from temporary lighting installations to facilitate events. A Lighting Management Plan will be required to ensure that a sensitive lighting strategy is implemented during events at Allianz Stadium. There must be a particular focus on avoiding additional light spill onto the Duke of Northumberland's River SINC, and this must also take into account any temporary lighting to be used in association with any event, including during set-up and take-down.

It is recommended that the *Institute of Lighting Professionals (ILP)\_Guidance Note 8: Bats and Artificial Lighting at Night* is used as a key point of reference for the production of this plan.

Overall, it is not considered that significant effects to biodiversity will occur that can't be mitigated and is therefore not likely to result in significant effects.

An Energy Strategy would also be expected with a planning application to deal with sustainability considerations in accordance with the development plan without the need for an EIA.

(d) the production of waste;

*Construction:*

No permanent structures are proposed and therefore no construction waste would be generated.

*Operation:*

The proposed scheme involves an increase in capacity of attendees and the total number of events to take place per year. As above, the Stadium currently hosts a number of sporting events at 82,000 attendees, and therefore it is anticipated that waste generated on site can be managed appropriately under the existing regime. Given the scale and specifics of this proposal, waste from the operational use of the site is not deemed likely to result in a significant effect on the environment on the basis that appropriate conditions could be applied in relation to refuse and recycling.

However, waste outside of the site at railway stations and routes thereto is not specifically addressed in the Turley Report, particularly at Twickenham Station. The cumulative burden of unmanaged waste in the public realm could therefore be significant without specific mitigation.

(e) pollution and nuisances.

*Light pollution*

As set out above, there is potential for adverse impacts from increased artificial lighting at night from temporary lighting installations to facilitate events. A Lighting Management Plan will be required to ensure that a sensitive lighting strategy is implemented during events at Allianz Stadium.

*Noise pollution*

The established guidance for noise from outdoor music events is contained in the Noise Council's Code of Practice on Environmental Noise Control at Concerts (1995), known colloquially as the Pop Code and is reflected in the current operating regime. It would appear the acoustic limits in place for the Allianz Stadium are based upon the Code.

Since the Pop Code, there has been a significant increase in the number of outdoor events in general throughout the UK, both in terms of venues used and their frequency. Surprisingly, this growth has not led to disproportionately adverse effects on communities. Similarly, in terms of the Allianz Stadium the use for music events has not resulted in significant noise complaints highlighting the original thresholds based on frequency of occurrence, while cautious at the time, may have been unduly limiting in context. As such, there is scope to adjust the thresholds



for a contextual increase in Music Noise Level or event days without causing unacceptable disturbance to affected communities in the Stadium environs.

In terms of the impact of rigging and de-rigging within Allianz Stadium, the continuous nature of the structure in terms of enclosure is noted with beneficial screening. With suitable conditions, this element can be controlled to ensure there will not be a significant noise impact.

In terms of noise impacts outside the site, the presence of residential dwellings directly above and adjacent to Twickenham Station requires particular attention in the context of cumulative night-time noise exposure. The proposed back-to-back events over four consecutive days—including a Sunday when service patterns differ—raises the risk of significant disturbance from:

- Increased footfall and crowd movement between the stadium and the station.
- Public address announcements, crowd control measures, and associated background activity.
- Extended train operations and prolonged platform waiting times during peak dispersal periods.

There is clear and well-established evidence in the public health literature that night-time noise has disproportionate health impacts, particularly in relation to sleep disturbance, stress, and cardiovascular disease. These impacts are likely to be amplified by the consecutive-night format of the proposed events, limiting residents' ability to recover between disturbances.

Given the scale, duration, and timing of these activities, there is a plausible pathway to significant noise-related environmental effects. This is particularly relevant given the advice received from the Rail Industry regarding the environmental and operational implications of the proposed additional events on the rail network (discussed further below).

### *Nuisance*

Given the number of people travelling to and from Twickenham Station to the stadium, this is likely to give rise to significant nuisance effects. This is already high for existing events and will only be worsened, especially with events over consecutive days and especially at night after an event. This includes event attendees walking to the station, when entering the station and whilst waiting on the platforms for the next train service. The potential for nuisance impacts on Twickenham residents adjacent to the station platforms as well as those along Whitton and Rugby Road, is considered to be potentially significant. This is particularly relevant given the feedback from the rail industry that currently, there is no certainty that the rail network could accommodate the increased use from all events at Twickenham which could lead to increase wait times for passengers that could then lead to further anti-social behaviour and increased crowds.

Additionally, passengers using the station following events at the stadium generate a significant amount of waste left in and around the station area and for which SWR are required to dispose of. This is a significant burden on both station staff and the local environment and will be worsened by more events operating at or near full capacity over consecutive nights.

### *Nuisance from traffic impacts*

The arrival trips for weekday events would likely conflict with the typical network PM peak in the vicinity of the site. Where road closures are implemented for weekday events. In this regard, TfL have advised that they have existing Notifications of Events (NOE) for the following bus routes 110, 267, H22, 281, 481. There is concern that road closures and the impact to bus routes and journey time reliability, particularly for consecutive weekday events, could create significant nuisance for users of these routes that have not been addressed.

TfL have also advised that to meet the Mayors Transport Strategy and strategic transport objectives, TfL would be seeking a shift towards 80% of trips to the stadium from walking, cycling or public transport. The information within the Turley Report and additional information has not specified whether this could be achieved.

Given the uncertainty regarding the ability of the rail industry to cater for the predicted increase in passengers, there is significant concerns about the additional demand placed on the transport and highway network by event goers and whether this demand can be satisfactorily managed. This is likely to result in a significant nuisance for Twickenham residents. This is particularly so given the proposal to host up to 4 consecutive events during the week where this has not previously been experienced by residents.

#### *Climate change and greenhouse gas emissions*

The scheme will need to provide cycle spaces, EVCPs in line with the GLA requirements. A Travel Plan will also need to be submitted. There will likely be a requirement to meet relevant Air Quality Neutral and the London Plan greenhouse policies. If the above are achieved, it is not considered that the proposed development would have a significant impact on climate change and greenhouse gas emissions.

- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;

Sporting events are permitted at Allianz Stadium throughout the year, as well as three concert event days. The Turley Report notes that the risk of major accidents and/or disasters will be controlled as per the current regime to avoid significant effects.

The nature of the current regime caters for larger events such as maximum capacity rugby events on the weekend with an earlier finishing time. This differs to the nature of the proposed events that are potentially to be held during weekdays that finish later in the evening. The potential for increased risk of accidents as a result of larger crowds later at night, dangers to pedestrian safety and the consequential risk of major accidents has not been sufficiently addressed. This view is also shared by TfL and NR.

- (g) the risks to human health (for example, due to water contamination or air pollution).

The development is within an Air Quality Management Area and there are several residential and education receptors within close proximity to the site. Currently, it is understood that there are approximately 12 x major sporting events (55,000 - 82,000) per year, so an additional 15 x major non-sporting days will be a significant increase. Unlike most sporting events, some of these dates could coincide with weekday peak hour traffic. Emissions for a larger area, including Richmond and Twickenham Air Quality Focus Areas, will need to be assessed. However, as set

out above, it is unclear whether the rail network will be able to cater for the additional attendees at maximum capacity events, which could lead to additional cars and therefore air pollution. Therefore, in terms of wider transport impacts, will need to address air quality as a result of increase in private car use.

## Summary

On the basis of the information provided in support of this screening, the scale and nature of the proposed development, the duration, intensity of any impacts (as identified above), in addition to the environmental context of the site and potential mitigation measures as set out in the submitted documents, as a result of potentially inadequate rail network services the resultant nuisance and noise effects are likely to be significant.

## 6.2. Location of the Development

The Allianz Stadium is bound to the north by Whitton Dene (with Mogden Sewage Works further to the north), to the east by Rugby Road, to the south by Whitton Road and to the west by the DoNR with Chase Bridge School and the Cardinal Vaughan Playing Fields on the opposite side of the river. Whilst the Stadium is located within the LBRuT, both Whitton Dene and Rugby Road form part of the boundary with opposite side of both roads falling within the London Borough of Hounslow ("LBH").

The use of the Site is primarily as a rugby sporting stadium with an 82,000 person capacity, known as the home of the Rugby Football Union and the England national rugby teams. The stadium building itself also includes a mix of uses, including a hotel, gym, and the Rugby Store.

The Stadium also hosts a variety of other non-sporting events including, concerts, conventions, conferences and other hospitality events associated with the mix of uses in the building. On rugby match days the wider Stadium is adapted to include various facilities depending upon the type of match and these may include live music, additional stands/food trucks and display marquees. These are primarily located within an area called the West Fan Village located to the west of the stadium and to the east of the DoNR. Provision is also made for shuttle bus services and coaching parking in the North Car Park along with temporary staff facilities.

The surrounding area to the site is characterised by residential and commercial uses, with low rise residential areas present to the north-east and south of the wider Stadium site.

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to

(a) the existing and proposed land use;

### *Current use*

In terms of non-sporting uses of the stadium, the current planning permission (LBRuT ref. 00/1908/FUL) granted in 2000 established the use of the stadium for concerts only, subject to the following limitations:

- Three concerts per calendar year between June - October (as dictated by the description of development and Condition 2 of the decision notice)

- A maximum of 50,000 persons (as dictated by Condition 3 of the decision notice)
- A finishing time of 10:30pm on the day of the concert
- Limitations in terms of set-up and pack down periods
- Limitations in terms of sound check timings and noise levels

Since the granting of the original planning permission, the following planning permissions have been granted:

- 06/0154/FUL. Variation to Condition 3 to allow for increase in capacity to 55,000 persons. Granted in 2006.
- 06/3036/FUL. Temporary planning application to increase number of concerts to 5 for 2007 only. This was granted permission on the basis that the two additional concerts were held on Saturdays and Sundays. Granted in 2006.
- 07/3802/FUL. Temporary planning application for 1 year period to allow 5 concerts which was implemented in 2008. The permission imposed a condition which did not allow concerts to be held on consecutive weekends and could only be held on Saturdays, Sundays, bank holidays and 27 June 2008. Granted in 2007.
- 10/1849/VRC. Variation to Condition 3 to increase stadium capacity to 60,000 for Help for Heroes charity concert only. Granted in 2010.
- 12/2990/FUL. Temporary planning application to permit 5 concerts for the year 2013. Granted in 2012.

The above permissions primarily relate to temporary permissions for additional non-sporting events in a single calendar year, with the only permanent permission being 06/0154/FUL to increase the permanent capacity for concerts from 50,000 to 55,000. This reflects the ad hoc approach to accommodating specific demand for non-sporting uses at the site.

The Turley Report notes (1.18) that the Allianz Stadium has permission for an unrestricted number of sport events throughout the year at a capacity of 82,000. It is noted that there is no planning permission that authorises the use of the stadium for sport events or limits the capacity to 82,000.

The pertinent point to the above is that the site has hosted sporting events (rugby) with a capacity up to 82,000. These rugby events (at or above 75,000 capacity) have been held on the weekend (with the exception of one event), and not during the week. Therefore, Council considers there to be no baseline to which consider an event with a capacity of 75,000 during a weekday.

#### *Proposed use*

The terms of the proposed use of the stadium are set out above and summarised as follows.

An increase in the number of major non-sporting event days from the existing 3 per annum to 15 per annum to be staggered up to the maximum number, as follows:

- 2026 – 6 major non-sporting days with no more than 4 separate events and 1 event outside of summer months
- 2027 – 12 major non-sporting days with no more than 6 separate events and 2 events outside of summer months; and

- 2028 – 15 major non-sporting days with no more than 8 separate events and 3 events outside of summer months.

The capacity for these major non-sporting event days is proposed to be increased from 55,000 to 75,000.

The maximum number of consecutive major non-sporting events to be 4 consecutive days. No more than 4 consecutive major non-sporting event days in any two-week period across all years.

For the avoidance of doubt, when assessing the impacts of the Proposed Development, Council have considered the maximum event days sought (i.e., 15 major non-sporting days with no more than 8 separate events, with 3 of these events to be outside of summer months).

It is acknowledged that there is potential for a wide variety of different composition of major non-sporting events throughout a calendar year whilst meeting the above parameters. For instance, the terms of the Proposed Development could provide for 3 separate major non-sporting events comprising 4 consecutive days over the space of 6 weeks, and three other events comprising a single event day, at any other time. Alternatively, 8 separate events comprising a single event day could be held over the space of 8 weeks.

A major non-sporting event is not clearly defined in the submitted documents. It is important to note that the existing planning permission is limited to concerts only, whereas it is understood that under the Proposed Development, a major non-sporting event could involve any use that is not a primary sporting function. For the purposes of assessing impacts, the Turley Report has assumed that concerts are likely to be considered the “worst-case scenario”. It is on this basis that Council have considered the proposed use.

## Transport

### *Impact of vehicular Traffic (Private Cars Parking and Dropping Off and Taxis)*

Council have taken the information provided in Extract 1 of the Turley Report, plus that in Table 6 of the additional information, and estimate that the link called A316 West in Extract 1 will incur a net increase of 208 PCUs in the period 17.00-18.00 on a weekday evening, the link at A316 East will incur an increase of 320 PCUs in that hour, and London Road will incur a net increase of 42 vehicles in that hour. This number of vehicles is greater than the threshold of a net increase of 30 two-way vehicular trips in the AM and/or PM weekday peak hour set out on page 42 of the Government Guidance for Transport Assessment (DfT, 2007).

Because of this, and subject to the opinions of Officers from TfL, Council consider that as part of the Transport Assessment, further modelling needs to be completed at the A316 Chertsey Road/London Road roundabout junction, and at the Hospital Bridge Road/A316 Chertsey Road roundabout junction with 2025 as the baseline assessment year, 2026 as the opening year, and 2028 as the final assessment year. This will allow Planning Officers and Transport Planners from Richmond Council and TfL to see how significant the impact of the net increases in passenger car units are at these junctions and whether any mitigation, such as altering the signal timings, is required to enable the junction to continue to operate with an acceptable safe degree of vehicular saturation.

The net impact of the proposal on buses serving the site relative to current and future forecast loadings also needs to be considered as part of the transport assessment, particularly as some bus services operate less frequently after 19.00 than they do in the normal working day. Impacts to bus services is also raised as a concern by TfL.

Limited information is provided in terms of taxi/Privat Hire Vehicle (PHV) strategies and whether these services would be available. More information in this regard will be required at planning application.

#### *Impact of the increase in Heavy Goods Vehicles (HGVs)*

On Page 26 of the note accompanying the additional information letter, notes that there will be no net increase in the number of HGV trips as a result of the increase in weekday evening event capacity from 55,000 attendees to 75,00 attendees. Given that during an event, additional consumables such as food, drink etc. on the site for 20,00 additional people on any event evening, Council find this difficult to agree with, and expect the RFU to clarify in their Transport Assessment how they will get this much additional material delivered using the same number of HGVs as they do for current weekday evening events. However, Council officers do not think the additional attendee capacity will lead to an increase of HGV trips of 30% or more on local authority or TfL-maintained roads. Therefore, the threshold for a full EIA assessment is unlikely to be reached in this regard.

#### *Diversion of rail Trips away from Twickenham Station to Richmond Station, Hounslow Station, and Hounslow East Station*

Table 7 of the additional information notes that, with improved traffic management and other measures, the RFU can decrease the number of net additional passengers using Twickenham Station from 10,420 to 2,789 and increase the net additional rail passengers using the District Line from Richmond Station from 168 to 2390, and using the Piccadilly Line from Hounslow East from 201 to 2423, as well as the net increase using Whitton from 45 to 1636 and Hounslow from 22 to 1616. They have not set out how they will do this, but it is assumed it is by encouraging more passengers to use the Shuttle buses and improved information for pedestrians. However, it is understood that only three shuttle buses currently run from Hounslow East. The Transport Assessment and Travel Plan will need to set out how these shifts away from Twickenham to other stations will be achieved.

#### *Summary*

Overall, vehicular traffic generation is considered unlikely to reach the thresholds at which guidance would recommend an EIA subject to the number of train passengers being as predicted. However, Council Officers have significant concerns about what is proposed in terms of the additional demand placed on the rail and highway network by event goers, especially late at night when leaving a concert. Currently, as advised by the Rail Industry (Network Rail and South Western Railway) there is no certainty that the rail network could accommodate the increased use from all events at Twickenham.

#### Noise

Noise impacts are considered above. In terms of the Allianz Stadium, the use for music events has not resulted in significant noise complaints highlighting the original thresholds based on frequency of occurrence. As such there is clearly scope to adjust the thresholds for a contextual increase in Music Noise Level or event days without causing unacceptable disturbance to affected communities in the Stadium environs.

However, regarding crowd management, as set out above, given the scale, duration, and timing of the proposed development, there is a plausible pathway to significant noise-related environmental effects on the residential dwellings directly above and adjacent to Twickenham Station.

#### Air quality

The development is within an Air Quality Management Area and there are several residential and education receptors within close proximity to the site. As above, there are approximately 12 x major sporting events (55,00 - 82,000) per year so an additional 15 x major non-sporting events will be significant. Additional transport emissions will be of concern. Unlike most sporting events, some of these dates could coincide with weekday peak hour traffic. Emissions for a larger area, including Richmond and Twickenham Air Quality Focus Areas, will need to be assessed. The Council considers that all concerns for air quality can be adequately addressed through an Air Quality Assessment. As such, it will not require an EIA to be undertaken to accompany any planning application for this development.

- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;

The site is within close proximity to the Duke of Northumberland's River SINC. In the absence of appropriate mitigation, there is potential for adverse impacts to the SINC. These impacts are not considered likely to be significant.

- (c) the absorption capacity of the natural environment, paying particular attention to the following areas—

- (i) wetlands, riparian areas, river mouths; -

No significant effect likely.

- (ii) coastal zones and the marine environment; -

No significant effect likely.

- (iii) mountain and forest areas; -

No significant effect likely.

- (iv) nature reserves and parks; -

Discussed above, no significant effect likely

- (v) European sites and other areas classified or protected under national legislation;

No significant effect likely.

- (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure; -

The whole Borough is within an Air Quality Management Area (AQMA) due to exceedances of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). The Turley Report outlines that an Air Quality Impact Assessment will be submitted as part of any future application.

The Site is located in an urban area, in close proximity to Chertsey Road (A316; dual carriageway). It is necessary to take account of air quality levels and to assess the vehicle movements that will be generated by the scheme.

Subject to the scheme meeting Air Quality Neutral, measures to minimise exposure to future residents and to improve air quality (secured via condition), significant effects are not considered likely.

- (vii) densely populated areas; -

The site is outside a Main Centre and located in a residential area. The site is in a relatively low-density area outside of the Borough's town centres. However, the development may cause impacts on the surrounding population in terms of noise, emissions, air quality and transport impact from proposed use.

The above matters have been discussed elsewhere in this report. Given the scale and siting of the development, the surrounding context (in terms of adjoining neighbours and land uses) and taking into account measures that could be applied and controlled through relevant Environmental and Health and Safety legislation and planning conditions, the development is not deemed to give rise to significant effects.

- (viii) landscapes and sites of historical, cultural or archaeological significance; -

There are no statutory listed heritage assets on the Site. The Site is not within a Conservation Area.

## Summary

Given the scale and nature of the proposed development, the duration, reversibility and intensity of any impacts (as identified above) and in addition to the environmental context of the site and potential mitigation measures, significant environmental effects are considered likely in relation to Transport Impacts.

### 6.3. Types and characteristics of the potential impact

The likely significant effects of the development on the environment must be considered in relation to

- criteria set out in points 1 and 2 (characteristics and location of the development),
- with regard to the impact of the development on the factors specified in regulation 4(2),
  - (a) population and human health;



- (b) biodiversity, with particular attention to species and habitats protected under Directive 92/43/EEC(1) and 2009/147/EC(2);
- (c) land, soil, water, air and climate;
- (d) material assets, cultural heritage and the landscape;
- (e) the interaction between the factors referred to in sub-paragraphs (a) to (d)
- taking into account—
  - (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);
  - (b) the nature of the impact;
  - (c) the transboundary nature of the impact;
  - (d) the intensity and complexity of the impact;
  - (e) the probability of the impact;
  - (f) the expected onset, duration, frequency and reversibility of the impact;
  - (g) the cumulation of the impact with the impact of other existing and/or approved development
  - (h) the possibility of effectively reducing the impact.

On the basis of the comments above, the potential for significant environmental impacts arising from the Proposed Development are limited to those relating to transport impacts and the consequential nuisance and noise, air and waste effects.

#### Construction

No physical works are required to the site in order to accommodate the increase in major non-sporting events, therefore no construction is proposed. The exception being temporary works to implement the transport interventions such as signage to improve wayfinding. In light of the above, there are no significant construction effects.

#### Operational stage

The operational phase of development does have the potential to generate significant effects, as follows:

##### *Population and human health:*

The Development does have the potential to impact upon the population through air quality, noise and nuisance late at night from extra services and overcrowding at Twickenham Station, bus reliability due to road closures, pedestrian safety and the generation of extra vehicle movements.

Given the number of people travelling to and from Twickenham Station to the stadium, this has the potential to give rise to increased impacts, especially noise. This is addressed above where the proposed development is considered likely to result in significant noise and health impacts on sensitive receptors directly above and adjacent to Twickenham Station.

##### *Biodiversity:*

It is unlikely that the proposal would result in harm to biodiversity due to the operational nature of the proposal, rather than establishing permanent structures that would result in a loss of

biodiversity. The scheme would be exempt from Biodiversity Net Gain. Effects on biodiversity will not be complex and can be reduced or avoided.

*Land, soil, water, air and climate:*

The scheme would result in an increase trip generation and would be accompanied by a Transport Assessment and Travel Plan. These impacts are discussed elsewhere in the report where it was found that significant impacts are not considered likely with the exception of air.

*Material assets, cultural heritage and the landscape:*

The development will not cause physical changes to the site and surrounds. Given the temporary nature of the proposal, heritage assessments and views analysis will not be necessary, and this impact is not deemed complex, or significant.

## **Summary**

Significant effects are considered likely as a result of the wider transport impacts and associated effects including noise and nuisance.

## **7. Conclusion**

The proposal constitutes Schedule 2 Development for the purposes of the Regulations and therefore requires screening pursuant to Regulation 32(2).

For the reasons set out above, and given the scale and nature of the proposed development, the duration, intensity of any impacts and in addition to the environmental context of the site and potential mitigation measures, the Local Planning Authority considers that the proposed development is likely to result in significant environmental effects on the environment and therefore the submission of an Environmental Statement is required in this instance.

This conclusion is reached taking into account the advice of the Rail Industry who are not satisfied that the railway network will be able to cater for the increase in capacity and number of events on the days/times as proposed. On the basis the rail network is not able to cater for the increase in capacity, this is likely to give rise to significant nuisance effects on Twickenham Residents and significant noise effects on residents above and adjoining Twickenham Station. This opinion has considered the proposal, the information above, the Regulations and the Planning Practice Guidance.

In accordance with Regulation 6 of The Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the London Borough of Richmond hereby determines the proposed development warrants the submission of an Environmental Impact Assessment / Environmental Statement, as set out in the meaning of the EIA Regulations 2017.

Please note that the opinion on the likelihood of the proposed development having significant environmental effects is reached only for the purpose of this Screening Opinion.

## **Decision: Positive Screening Opinion limited to Transport Impacts**

Date of Opinion: 30 July 2025

Yours faithfully



**Chris Tankard**  
**Team Manager – Development Management (North)**