



Ms Pam Alexander OBE
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21 September 2022

London Legacy Development Corporation Planning Decisions Committee's resolution to approve the advertising consent for the 'MSG Sphere' in Stratford – Application ref: 19/00098/ADV

Dear Ms Alexander,

As you will be aware, on Tuesday 22nd March 2022, the London Legacy Development Corporation Planning Decision Committee (LLDC PDC) resolved to approve the planning application submitted by an entity owned by the Madison Square Garden Entertainment Corp (MSG) for the 'Sphere', a new multi-use entertainment venue, in the heart of Stratford. (Application ref: 19/00097/FUL).

Alongside the above application the applicant sought advertising consent for a 33,929sqm LED façade for an unprecedented period of 25 years, rather than the usual 5 years. This was also considered by the LLDC PC on 22 March 2022. Given the *"residual uncertainty"* about the nature and extent of visual intrusion on residential amenity and the visual impacts of the advertising proposals more generally, a 5-year review mechanism was proposed by Members. The LLDC PDC will vote on this mechanism in due course.

Local opposition is strong, with one resident describing the Sphere as *"a Vegas-style design that ignores best practice standards, and in doing so creates a greatest-hits compilation of Olympic Park planning failures from the last decade."* The LLDC PDC has already made a decision on the main development but there is an opportunity to ensure that a meaningful review mechanism is in place in respect of the advertising to ensure the residential amenity of local residents is not compromised.

All previous local councillor members of the LLDC PDC have shared this sentiment, voting against the scheme at the March meeting (planning approval was only given due to the votes of independent members). Lyn Brown, MP for West Ham, has said that the decision to approve reflects a pattern: *"Much of the development that has been done since the Olympics has been done to us and not for us."*

AEG Europe has opposed the proposal since it was originally made in 2019. AEG recognises that there is space in the London market for a new large-scale entertainment venue but this scheme – a 21,500 capacity arena (plus a music club and retail uses), which has been transposed directly from Las Vegas to a mixed-use area of London, with a significant volume of residential properties immediately adjacent to the development site – is the wrong development, in the wrong location and should be refused.

We believe that in order for LLDC PDC Members to make an informed decision on the suitability of any proposed 5-year review mechanism:

- a) public consultation should be carried out on the proposed mechanism wording prior to this being considered by the Planning Decisions Committee; and
- b) the full drafting, informed by that public consultation, must be available for Members' consideration.

We set this out in a letter to LLDC on 14 April 2022 but have not yet received any response to this.

It is only with the benefit of both the public's view on the proposed review mechanism wording and the benefit of seeing this in full, that Members will be able to consider whether it adequately addresses their concerns regarding the uncertainties and visual impact of this unprecedented development.

Given the uncertainties identified by officers and the concerns expressed by Members, the starting point of any review should be that no advertising can be displayed after a 5-year period unless the review



evidences that, in the interests of amenity and public safety, it would be acceptable to allow the displays to continue. In doing so the relevant decision maker would be making a decision about the continued operation of the displays in accordance with Regulation 3 of the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (Advertising Regulations).

It is our view that as part of that any mechanism needs to:

- a) Be informed by on-going public feedback.
- b) Be informed by independent consultation with local residents to understand their experiences of living in proximity to the facade. To ensure that this is genuinely independent this should be commissioned by the relevant planning authority at the cost of the applicant. To ensure that the consultation carried out is genuinely independent, the persons appointed to carry it out should have had no previous involvement in the scheme and have had no previous involvement with the applicant or relevant planning authority.
- c) Include the power for the relevant planning authority to impose additional controls on the advertising including, for example, changes to the hours of operation, percentage of advertising that may be shown, nits levels, the extent of moving imagery vs still imagery displayed. The power must also extend to requiring the illuminated façade to be switched off entirely where that is necessary to address the impact on local residents.
- d) Be carried out by the local planning authority, and the extent of any additional controls required must be confirmed, prior to the 5-year anniversary of the operation of the advertising.

We would be grateful if you would consider meeting with us to discuss this proposal, and in doing so, consider the concerns we have raised in this letter, many of which are supported by a range of other stakeholders such as local residents and political figures. Please see the attached brochure for further detail on this. I look forward to hearing from you, and please do not hesitate to get in touch should you have any questions.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Hill', written in a cursive style.

Alex Hill
President & CEO, AEG Europe