

TO DARE IS TO DO



Mr Robbie McNaugher MRTPI
Head of Development Management and Planning Enforcement
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5 April 2023

By Planning Portal: Ref PP-12036524 and
Email: robbie.mcnaugher@haringey.gov.uk

Dear Mr McNaugher

Tottenham Hotspur Stadium

Application to amend Condition B16 (Major Non-association Football Events) of Planning Permission HGY/2015/3000

Further to our pre-application discussions on this matter, I enclose an application under S.96A of the Town and Country Planning Act 1990 to amend Condition B16 of planning permission HGY/2015/3000, which reads:

"No more than 16 major non-association football events (greater than 10,000 visitors) shall be held per annum in the stadium of which no more than 6 shall be music concerts."

Reason: To protect the environment and amenities of the locality."

For the reasons set out below, we propose the following amendment to that condition:

"No more than 16 major non-association football events (greater than 10,000 visitors) shall ordinarily be held per annum in the stadium of which no more than 6 shall be music concerts, except during the calendar year 2023 where there shall be no limit on the number of music concerts within the overall limit of 16 major non-association football events."

Reason: To protect the environment and amenities of the locality."

Background and Context to Application

The Tottenham Hotspur Stadium ("THS") began holding Major Events¹ from 24 March 2019 and in the absence of any definition to the contrary, "per annum" has been taken to mean each calendar year for the purposes of Condition B16.

¹ Defined in the S.106 as more than 10,000 spectators

Up to the end of the 2022 calendar year, the THS could have hosted up to 24 concerts and 40 non-concert Major Events. The THS had actually hosted 4 concerts and 11 non-concert Major Events over that period (17% and 28% of the cumulative allowance respectively).

The THS has already hosted a rugby union game on 25 March (Saracens v Harlequins) and there are 5 Beyonce concerts scheduled on 29 May, 30 May, 1 June, 3 June and 4 June. A 6th concert (Red Hot Chilli Peppers) is proposed for 21 July and subject to this application, a 7th concert (WizKid) is proposed on 29 July. Two further NFL games have been announced at the THS, taking the number of concerts for 2023 to 7 and non-concert major events to 3: a total of 10 non-association football major events.

Even if all 6 concerts and all 10 non-concert Major Event allowances are utilised during 2023, the respective percentages would only be 33% and 42% overall. This is in part due to the Covid pandemic where no concert or non-concert Major Events were held at the THS during 2020. As a result of the pandemic, numerous music artists had to postpone tours, which has led to higher demand for venues in the years following. This could not have been foreseen at the time the stadium permission was granted. The need for this application therefore arises from the need to allow greater flexibility to enable the THS to continue to attract a wide variety of World class artists to Tottenham.

It is worth noting that a single artist performing five shows in the same venue is relatively unusual and that an artist such as Beyonce doing so, is testament to the THS and Tottenham more widely. It is even more exceptional for any artist to perform on more than two consecutive dates. However, the Club will continue to review all feedback from stakeholders and use this to inform the planning of future events.

This application therefore does not seek more “major non-association football events” than the sixteen allowed: merely flexibility between them.

Concerts v Non-Concert Major Events

With the THS having now staged a wide variety of both concerts and non-concert Major Events ranging from NFL to rugby to boxing, the Club has the benefit of being able to quantify and compare many of the measurable impacts associated with these events.

We attach a table which sets out details of all the concert and non-concert MEDs that were held at the THS during 2022. There were ten Major Events in total: four concerts and six non-concerts.

The table records the official attendances for each event; the road closure start/finish times and durations; the maximum off-site recorded noise levels; and the number of recorded complaints for each of the events. Although not exhaustive, they do provide a quantitative picture of the ‘impact’ of each of these events on the local community, which goes to the heart of the condition. The associated noise reports are included as part of this application.

The table averages these impacts for both concerts and non-concerts. On all measures except noise (where all recorded noise levels are similar and in any event, comfortably within prescribed limits), the impact on average of concerts is demonstrably less. There are significantly fewer attendees; slightly shorter road closures; and slightly fewer complaints. By these measures, we believe the difference between concerts and non-concerts last year is immaterial.

The proposed licenced capacity for the Beyonce concerts this year is in the region of 44,000. The proposed licence capacity for the Red Hot Chilli Peppers concert is approximately 47,000 and (subject to approval of this application) also approximately 47,000 for the Wizkid concert. Similar attendances therefore to those already held. Because of the configuration of the stadium for a concert and the seats lost to accommodate the stage, the achievable capacity for nearly all concerts will be similar.

We expect this year's NFL games to be at full stadium capacity again and just over 55,000 attended the Saracens game on 25 March. The quantifiable impacts of both concert and non-concert MEDs will therefore be very similar to 2022.

On this basis, we think there is clear evidence to support flexibility between the two categories, as the difference between them is non-material.

Consultation and Mitigation

Whilst these events do bring significant socio-economic benefits to the local area and London more widely, the Club remains acutely conscious of the need to continue to minimise their impact on their local community. There are continuing discussions between the Club and the Council about further refinements to the Local Area Management Plan ("LAMP") to further minimise the impact of events at the THS, including specifically in relation to the Beyonce concerts.

The Business and Community Liaison Group ("BCLG") which has been meeting regularly since construction of the THS began, provides a forum for regular dialogue between the Club and the community on a wide range of issues. It is well attended and comprises Ward Councillors, Council officers; and representatives of local businesses and residents associations.

The Club held a BCLG on 7 March, which focused on the forthcoming concerts and in particular on the five Beyonce concerts which will be taking place over a seven day period. Although the Beyonce concerts of themselves do not necessitate this application, the Club is nevertheless working closely with the local community both to minimise the impacts of these concerts and to ensure (including through the distribution of free local tickets and the advertising of event-related employment opportunities) that as many residents as possible benefit directly from hosting of these events, in addition to the many local businesses that will benefit economically.

The Club has scheduled another concerts-focused BCLG on 13 April, but with widened attendance beyond the core BCLG to ensure that as many stakeholders as possible have the opportunity to comment. We would seek to agree the attendees with the Council in advance and will ensure that this application is signposted so that as many stakeholders as possible are made aware of that the Club is applying for. That BCLG is being timed to take place during the determination of this application. If appropriate, the Club will hold another BCLG in May ahead of the first Beyonce concert.

One of the issues raised during the last BCLG was the street cleansing and waste collection associated with Major Events. It is worth noting that for all non-association Major Events held at the THS, the Club agrees an appropriate level of street cleansing and waste collection (i.e. bronze, silver or gold) with the Council and its contractor, Veolia in advance of each event based upon the specifics of that event. The Club then pays for that service. That arrangement is not affected by this application and will continue to apply irrespective of whether such events are concerts or non-concert Major Events.

In accordance with the THS Premises Licence, all events finishing after 22:00hrs (which would ordinarily include all concerts) will also require the Club to submit a "Bespoke Transport Plan" for approval, which comprises a travel demand forecast/more share and any addenda to the version of the approved LAMP that deals with concerts.

At the discretion of the Council's Head of Building Control, all such events are subject to Safety Advisory Group ("SAG") meetings.

In short, the introduction of flexibility between concerts and non-concert Major Events does not affect the Council's control over the operational aspects of these events.

We therefore enclose the following with this covering letter:

- this explanatory covering letter;
- application forms;
- location plan;
- block plan;
- schedule comparing Concert v Non-Concert Major Events);
- noise report following Guns'N'Roses concerts on 1 and 2 July 2022;
- noise report following Lady Gaga concerts on 29 and 30 July 2022; and
- noise report following Tyson Fury v Derek Chisora boxing match held on 3 December 2022.

Payment of the sum of **£234.00** has been made via the Planning Portal.

I trust that the enclosed is acceptable, and I look forward to receiving formal confirmation of validation in due course. In the meantime, please do not hesitate to contact me should you have any queries or require further information.

Yours sincerely



Richard Serra MRICS MRTPI
Property Director

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