NOTICE OF MEETING

SPECIAL PLANNING SUB COMMITTEE

Wednesday, 16th December, 2015, 7.00 pm - Civic Centre, High Road, Wood Green, N22 8LE

Members: Councillors Peray Ahmet (Chair), Vincent Carroll (Vice-Chair), Dhiren Basu, David Beacham, John Bevan, Clive Carter, Natan Doron, Toni Mallett, James Patterson, James Ryan and Elin Weston

Quorum: 3

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES

3. URGENT BUSINESS

It being a special meeting of the Committee, under Part 4, Section B, paragraph 17 of the Council's Constitution, no other business shall be considered at the meeting.

4. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and

(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. PLANNING APPLICATIONS

In accordance with the Sub Committee's protocol for hearing representations; when the recommendation is to grant planning permission, two objectors may be given up to 6 minutes (divided between them) to make representations. Where the recommendation is to refuse planning permission, the applicant and supporters will be allowed to address the Committee. For items considered previously by the Committee and deferred, where the recommendation is to grant permission, one objector may be given up to 3 minutes to make representations.

6. TOTTENHAM HOTSPUR STADIUM, 748 HIGH ROAD N17 0AP (HGY/2015/3000), WARMINGTON HOUSE, 744 HIGH ROAD, N17 0AP (HGY/2015/3001), 44 WHITE HART LANE, N17 8DP (HGY/2015/3002) (PAGES 1 - 414)

Planning Application HGY/2015/3000 (Northumberland Development Project)

Hybrid application seeking full permission for some parts of the scheme and outline permission for others.

RECOMMENDATION: grant permission, taking account of the information set out in the Environmental Impact Assessment, subject to conditions and informatives, subject to the prior completion of a Section 106 Legal Agreement and subject to referral to the Mayor for London.

Listed Building Application HGY/2015/3001 (Warmington House).

Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project.

RECOMMENDATION: grant Listed Building Consent subject to conditions and informatives.

Planning application HGY/2015/3002 (44 White Hart Lane).
Separate application for temporary planning permission for the use as a construction compound for the stadium development for a period of 3 years.

RECOMMENDATION: grant permission subject to the conditions and informatives and subject to the completion of a Section 106 Legal Agreement.

7. DATE OF NEXT MEETING

11 January 2016.

Maria Fletcher
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Bernie Ryan
Assistant Director – Corporate Governance and Monitoring Officer
River Park House, 225 High Road, Wood Green, N22 8HQ

8 December 2015

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Planning Sub Committee 16th December 2015 Item No.

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: **Ward:** Northumberland Park
HGY/2015/3000 (Main Planning Application)
HGY/2015/3001 (Listed Building Application)
HGY/2015/3002 (Temp Construction Compound)

Addresses:
Tottenham Hotspur Stadium, 748 High Road N17 0AP (HGY/2015/3000)
Warmington House, 744 High Road, N17 0AP (HGY/2015/3001)
44 White Hart Lane, N17 8DP (HGY/2015/3002)

Applicant: Tottenham Hotspur Property Company Ltd

Ownership: Private

Case Officer Contact: Emma Williamson

Date received: 18/09/2015 **Additional information received:** 11/11/2015

Drawing number of plans and documents:

See Appendix 1

2. Overview

2.1 Tottenham Hotspur Property Company Limited was granted planning permission by Haringey Council in 2011 for the redevelopment of White Hart Lane Stadium and the surrounding land. The project is known as the Northumberland Development Project (NDP) scheme. Phase 1 of the NDP scheme has been completed and comprises a Sainsbury's superstore on Northumberland Park Avenue and Lilywhite House which is home to Tottenham University Technical College and the club's offices. The land to the north of Paxton Road has now been cleared of buildings and work is currently underway on the stadium phase of the consented NDP scheme. Paxton Road has now been Stopped Up and closed.

2.2 Tottenham Hotspur Property Company Limited has now submitted a new planning application (HGY/2015/3000) and associated Listed Building Consent Application (HGY/2015/3001) revising its proposals for the new stadium and

remainder of the site. This new application proposes a number of changes from the earlier permission including:

- A larger stadium than that granted planning permission for which groundworks are currently underway (61,000 seats rather than 56,250) incorporating a retractable football pitch that allows the stadium to host NFL games and other sporting and non-sporting events. The club recently announced a ten year agreement to host a minimum of 2 NFL games a year from 2018.
- An increase in the number of residential units permitted (585 rather than 285) provided by way of 4 No residential towers up to 35 stories including 5 three storey residential units in the plinth facing Park Lane.
- An increase in the number of parking spaces
- A new Club store and museum described as ‗The Tottenham Experience'.
- An ‗Extreme Sports Centre'.
- A 180 bedroom hotel with an additional 49 serviced apartments.
- A community medical centre.
- 4000 m^2 of flexible community/office space (Use Class D1 or B1).
- The demolition of three locally listed buildings, 746, 748 and 750 High Road, and works to the Grade II Listed Warmington House for which a parallel application for Listed Building Consent (ref HGY/2015/3001) has been submitted.
- New and enhanced public realm including improvements to the existing public highway along the High Road, Park Lane and Worcester Avenue, and new public realm at street and podium level including a new public square.

2.3 This application is considered to be —Schedule 2 development" for which an Environmental Assessment is required. The application is accordingly accompanied by an Environmental Statement.

2.4 To facilitate the building of the development Tottenham Hotspur has also submitted a separate planning application (HGY/2015/3002) to use a 1.02 hectare site at 44 White Hart Lane as a construction compound for a temporary period of 3 years. The site is an authorised waste site which has a license for the recycling of motor vehicles. This use has now ceased on the site. The Club has already commenced using the site for the storage of plant and material being used in the current construction work being carried out at the stadium. The club intend to use the site for the housing of their construction management and construction worker welfare offices; the storage of construction materials; and for the location and operation of a concrete batching plant. As this proposal involves the change of use of a licensed waste management site it is being advertised as departure from the Development Plan.

3. Proposals:

3.1 Planning Application HGY/2015/3000 (Northumberland Development Project)

3.1.1 The planning application is a hybrid application seeking full permission for some parts of the scheme and outline permission for others.

3.1.2 Full planning permission is sought for:

- New 61,000 seat stadium and the surrounding public realm;
- ‗The Tottenham Experience', a multi-use building comprising the club megastore, museum, cinema, café, Skywalk reception and changing facilities, stadium ticket office, and incorporating the Grade II Listed Warmington House in to the building;
- A 22-storey hotel comprising 180 bedrooms and 49 serviced apartments;
- The demolition of three locally listed buildings (746, 748 and 750 High Road), a terrace of seven houses (20 to 32 (evens) Worcester Avenue) which are vacant), the existing club shop and the current stadium.

3.1.3 Outline planning permission is being sought for:

- The construction of four residential blocks comprising:
  - 2 blocks up to 16 storeys (69m) in height above podium;
  - 1 block up to 24 storeys (96m) in height above podium; and
  - 1 block up to 32 storeys (123m) in height above podium.
  These towers will provide a maximum residential floor space of 49,000 m^2 or a maximum of 585 units including 5 three bedroom residential dwellings located on Park Lane.
- The construction of 4,000 m^2 flexible community (Class D1)/office (Class B1) floorspace in the lower floors of the podium below the residential blocks in the SE corner of the site. Detailed approval is sought at this stage for matters relating to —access", "layout" and —scale". The application seeks to reserve matters relating to —appearance" and —landscape";
- The construction of an Extreme Sports building (Class D2) providing up to 2500 m2 of floor space in a structure up to a max 51.2 m high. Detailed approval is sought at this stage for matters relating to —access" and —layout". The application seeks to reserve matters relating to —appearance" and —scale". The landscaping associated with this building will be submitted in full; and
- The Community Health Building (Class D1). Detailed approval is sought at this stage for matters relating to —access", "layout" and —scale". The application seeks to reserve matters relating to —appearance". The landscaping associated with this building is submitted in full as it also forms part of the public realm for the new stadium.

3.2 Listed Building Application HGY/20150/3001 (Warmington House).

3.2.1 Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project.

3.3 Planning application HGY/2015/3002 (44 White Hart Lane).

3.3.1 A separate application for temporary planning permission for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years.

3.3.2 The Club intends to use the site to support the early phases of development and seeks permission for a temporary period of three years, with the time limit to be secured by condition. This will allow the site to be used for the construction of the stadium and associated uses.

3.3.3 Temporary planning permission is sought for:

- 3-storeys of temporary portacabins to house housing site management and welfare offices;
- Material storage;
- Installation and operation of a concrete batching plant; and
- 2.4m high boundary fence

3.4 HGY/2015/3000 & HGY/2015/3002 are being reported to Planning Committee as both are major planning applications. HGY/2015/3001 is an application for Listed Building Consent linked to HGY/2015/3001.

4. RECOMMENDATIONS

4.1 **Planning Application HGY/2015/3000 (Northumberland Development Project).**

4.1.1 That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Impact assessment, and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Section 106 Legal Agreement to secure the obligations set out below, of this report and subject to referral to the Mayor for London.

Summary of key reasons for the recommendation:

- The National Planning Policy Framework (NPPF) promotes sustainable development. The definition of sustainable development includes social, economic and physical development of an area to support the delivery of new homes and jobs to meet identified need.

- Having regard to the objective of securing delivery of development in line with the core objectives of the NPPF, the application has been assessed as being consistent with the strategic objectives of the Development Plan for the area which promotes sports led regeneration on the site as part of the wider regeneration of this area.

- The application indicates how it will support the delivery of significant economic growth and new housing and how this corresponds with the wider regeneration aspirations for the area expressed through the development plan and associated non statutory regeneration and planning frameworks, prepared and adopted by the Council and its partners. The London Plan sets housing and employment targets for each London borough and the proposals will contribute to meeting these targets. The regeneration of the Site is also a key contributor to the growth of Tottenham and will be a key to allowing for improvements to the physical, social and economic status of the area.

- The Site has been identified as suitable for significant redevelopment within local planning policy (and by way of earlier planning decisions) as well as acting as a wider catalyst for sustainable growth. The proposals allow for this significant site to be redeveloped which in turn will ensure that the wider benefits will be achieved.

- The Development is of high quality, with the potential to be considered iconic, it delivers substantial public benefits which will regenerate the area and act as a catalyst for wider regeneration, the heritage harm is necessary to deliver these public benefits and this outweighs this harm. The development is considered to be in accordance with Development Plan policies. None of the other material considerations outweigh the policy support for the development.

4.1.2 The proposal delivers the following:

- A new —world class" 61,000 seat stadium capable of hosting a variety of major sporting and non sporting events, with improved safety, whilst attracting a significant number of additional visitors to the area.
- A new 180 bedroom hotel with an additional 49 serviced apartments.
- A new multi-use building, ‗The Tottenham Experience', comprising the club megastore, museum and other visitor attractions.
- A Sports Centre (Class D2) with the aspiration for this to focus on extreme sports building including the potential for the world's highest climbing wall and one of its deepest dive tanks.
- The creation ofa leisure/sports focussed 7 day a week destination with an international profile.
- A package of measures including training secured by s106 to maximise the job opportunities for local people in construction and the operation of the proposed facilities.

- A new high quality public realm in and surrounding around the development including a new public square.
- New D1 space intended for use as a community health centre.
- The restoration of the Grade II Listed Warmington House and the repair of nine listed buildings within the site boundary so as to safeguard and secure future use of the retained heritage assets. .
- The construction of 585 new homes.
- An estimated 890 construction jobs.
- An estimated 820-1030 additional jobs (range depends on if community use or office)
- Estimated at least 19.45 million contribution to the local economy per year.

4.1.3 The application demonstrates that the proposals, whilst not currently capable of providing affordable housing, provide for a mechanism to secure contributions towards the delivery of off-site affordable housing in the event that the viability of the residential development improves significantly.

4.1.4 The loss of the three locally listed buildings proposed to be demolished; the Edmonton Dispensary, the former White Hart Public House and the Red House has been assessed. The view of the Council's Conservation Officer disagrees with the applicant's own assessment and concludes that the proposals will result in substantial harm to the Tottenham High Road Conservation Area. In her view the impact of the new stadium, hotel, 'extreme sports' building and 4 residential towers will, because of their height and overall size, have a negative impact on views from the conservation area over the site and the negative impact of the development on heritage is not mitigated by the refurbishment and restoration of Warmington House or the previously required repair and external refurbishment of the other listed and non listed buildings within the applicant's ownership, or by the high quality design of the different elements of the proposed development or by the quality of the proposed public realm. Overall the scheme is considered to result in substantial harm to the conservation area.

4.1.5 The Council has undertaken an assessment of all elements of the application and concludes that the harm is necessary to achieve the substantial public benefits and this harm is outweighed by the substantial public benefits.

4.1.6 The proposal would therefore satisfy the statutory duties set out in Section 66 and section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests in paragraph 133 of the NPPF, and accord to the design and conservation aims and objectives as set out in the NPPF, London Plan Policies 7.4, 7.5 and 7.6, saved UDP Policies UD3 and CSV4, Local Plan Policies SP11 and SP12 and SPG2 'Conservation and archaeology'.

4.1.7 The environmental effects of the development as detailed in the environmental information contained in the environmental statement have been assessed and,

subject to appropriate mitigation and controls, the proposals do not result in significant adverse environmental effects that would justify refusal of the planning application.

4.2 Listed Building Application HGY/2015/3001 (Warmington House).

4.2.1 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management is delegated authority to issue the Listed Building Consent subject to the conditions and informatives set out below.

4.2.2 Summary of key reasons for the recommendation:

- Warmington House is currently in a very poor condition and is on Historic England's Heritage at Risk register. The proposed change of use and the associated works to its interior and exterior will fully restore much of its character and remove all detracting later additions enhancing its significance. The proposal would therefore satisfy the statutory duties set out in Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and accord to the design and conservation aims and objectives as set out in the NPPF, London Plan Policies 7.4, 7.5 and 7.6, saved UDP Policies UD3 and CSV4, Local Plan Policies SP11 and SP12 and SPG2 _Conservation and archaeology'.

4.3 Planning application HGY/2015/3002 (44 White Hart Lane).

4.3.1 That the Committee resolve to GRANT the application and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in Appendices and subject to the completion of a Section 106 Legal Agreement to secure the obligations set out later in this report.

4.3.2 Summary of key reasons for the recommendation:

- The proposal is not considered to be a departure from the development plan policy SP6.
- The provision of a construction compound on this site will improve the efficiency of the construction phase on the main NDP site, allowing the stadium development to be completed more quickly and thus reducing the construction impacts on the locality.
- It will also allow for the concrete required to construct the stadium and associated structures to be prepared on a site within 150 metres of the NDP site and reduce the significant quantities of aggregate recycled on the site from having to be transported to destinations elsewhere for disposal/re-use. It is estimated that approximately 72,900m3 will be excavated in order to form the basement, of this it is estimated that approximately 62,400m3 can be reused on site (i.e. 88%). This will reduce the HGV vehicle kilometres generated by the construction phase of the NDP site which will have spin-off

benefits in terms of reducing the traffic and air quality impacts when considered in the round.

- While the proposal will have a localised impact on the highway network, in White Hart Lane and at the Junction of White Hart Lane and the High Road, these impacts are not significant and can be sufficiently mitigated by the conditions and obligations set out in the appendices and below.
- Localised impact on Air Quality arising from additional traffic into and out of the site will be offset by overall reductions in Carbon Dioxide emissions.
- The submitted noise assessment confirms that, subject to appropriate controls on the proposed operations the increase in noise from the proposed use would be within acceptable limits having regard to the surrounding residential land uses and taking account of the previous use.

5.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS

Planning Application HGY/2015/3000 and Listed Building Consent HGY/2015/3001 (Northumberland Development Project including Warmington House).

5.1 Proposed development

5.1.1 The Northumberland Development Project comprises the following components:

- The new stadium;
- The Tottenham Experience, including Warmington House;
- The hotel and serviced apartments;
- The extreme sports building;
- The residential and associated flexible office and or community space;
- The community health building; and
- The public realm including the podium.

5.1.2 A summary of each of these development components is set out below.

5.2 The New Stadium (Use Class D2 applied for in full)

5.2.1 A new 61,000 seat stadium incorporating:

- A 17,000 seat single tier stand (the largest in the UK);
- A fully retractable pitch that allows the grass football pitch to retract beneath the southern stand, revealing an artificial surface able to host non-football sports such as American Football, concerts and community events;
- A new five-storey atrium space within the south stand that will provide a range of food and beverage outlets;
- A bold design comprising a perforated metallic mesh skin wrapped around the exterior, with large glass sections allowing views into interior of the stadium;

- A prominent stadium ‗front door' opening up onto the High Road, also allowing views into the interior;
- A Media Café at the north-west corner of the stadium, fronting on to the High Road.
- A prominent entrance for the East Stand onto Worcester Avenue (forming the principal entrance to the Stadium when in use for NFL).
- Conference and banqueting.
- A ‗SkyWalk' along the South Stand allowing people to climb the exterior of the building.
- Match day car parking located beneath the stands and in the basement, accessed from the High Road and Worcester Avenue.
- 17,053 sq.m. of food and drink uses are proposed, approximately half of this (to be determined during fit out) is likely to be Corporate Hospitality and restaurant spaces.

5.3 The Tottenham Experience (Sui Generis applied for in full)

5.3.1 The Tottenham Experience is a large multi-use facility, located within the High Road Conservation Area and partly under the south-west corner of the proposed podium. Construction of the building and creation of the public realm along this stretch of the High Road results in the complete demolition of three Locally Listed Buildings on the site. The new building wraps around the rear of the Warmington House to create the appearance of a new terrace fronting the High Road and providing access to spaces within the restored Grade II Listed Warmington House. The building embodies a deliberate, contemporary design form which is visually ―separated" from but ―attached" to the Listed building by way of glazing and an enclosed atrium to the rear behind Warmington House allowing views of the rear of the Listed Building from the proposed elevated podium area. The Tottenham Experience provides another means of making the transition from street level to podium level.

5.3.2 The Tottenham Experience will accommodate a wide range of club-related leisure type uses within, and on the roof, of the resultant terrace that in combination are not considered to fall within any single defined use class and include the following elements:

- Club Shop (1955 m^2)
- Ticket office & booths (242 m^2)
- Cafe (260 m^2)
- Roof walk reception and changing (100 m^2)
- Museum (728 m^2)
- Club cinema (400 m^2)
- Warmington House
- Roof top terraces.

5.3.3 As well as incorporating Warmington House into a new terrace, the applicant intends to include elements from the fabric of the three locally listed buildings to be demolished into the interior spaces within the building, such as Bill Nicholson‘s office from 748 High Road (‗The Red House‘) and part of the facade of the Edmonton Dispensary (746 High Road). Details of this approach are conditioned.

5.4 Hotel and Serviced Apartments (Use Class C1 applied for in full)

5.4.1 Located in the south west corner of the site, at the junction of High Road and Park Lane, will be a 22 storey (ground plus 21 stories) hotel. It is proposed as a long ―blade" shaped building on a broadly north-south axis running down the High Road and integrated into the proposed stadium podium.

5.4.2 The hotel will have 180 bedrooms arranged over floors 3 to 14 with 49 serviced apartments over floors 15 to 21. The lower floor levels of the hotel will accommodate restaurants, bars, workspace, gym, swimming pool and corporate facilities. At the top floor level will be a foyer restaurant and roof-top bar. The hotel will be served by a dedicated basement car park accessed directly off the High Road, providing 76 car parking spaces. There will also be a dedicated coach and car/taxi drop-off point to the south of the hotel entrance on Park Lane.

5.4.3 The applicant intends that the hotel will incorporate dedicated training programmes for the hospitality sector, with a focus on ensuring local residents are able to take advantage of the new employment opportunities created. Submission of details of this programme, together with other local employment opportunities associated with the other elements of the application is conditioned.

5.5 The Extreme Sports Centre (applied for in outline)

5.5.1 Located along Park Lane and with a maximum height of 51.2m and providing a maximum 2,100m^2 of Leisure (class D2) floorspace for use as a sports centre that has the potential to accommodate a range of ―extreme sports" and other sports focussed leisure activities, the details of which are not yet set. The building will sit on the eastern side of the Hotel and form the eastern part of a new eastern entrance plaza to the Stadium.

5.5.2 The planning statement describes the vision for the building as offering a range of unique sporting activities, with the potential to include one of the world‘s tallest indoor climbing walls, as well as a climbing wall along the outside of the building. The opportunity to incorporate a scuba diving tank is also currently being investigated. At the lower levels of the building, there will be space to accommodate high performance activities such as speed, agility and reaction tests for all ages and abilities. It is intended that the uses within the centre will be strongly linked to the national curriculum so that the centre can be used by local

schools and training centres. The applicant will be required to submit a community use strategy prior to the occupation of the building for agreement with the Council.

5.5.3 At the top of the building, 51.2m above ground floor, the applicants consider that there is the potential to accommodate a café that provides unique and unrivalled views of the climbing walls and diving tank, as well the stadium, public realm and wider Tottenham area.

5.5.4 At this stage the application seeks outline consent for this building, with full details submitted for approval covering access to the building, the layout and the surrounding landscaping. Detailed matters relating to scale and appearance are reserved to a later date once the exact form and nature of the uses to be incorporated within the building are more clearly defined.

5.6 The Southern Residential (applied for in outline)

5.6.1 The proposed residential component will provide up to 585 units (up to 49,000m^2 of floor space) and will occupy the south-east corner of the site, fronting both Park Lane to the south and Worcester Avenue to the east.

5.6.2 The application seeks outline planning permission for this element, with matters relating to —appearance" and —landscape" reserved for approval at a later date. Details are submitted for approval in relation to the —layout" and —scale" of the buildings as well as —access".

5.6.3 To control the design quality that the development will deliver, a Residential Design Code Document is submitted in support of the planning application. The Design Code is submitted for approval and sets out a series of design requirements that any future reserved matter application must adhere to. The Design Code covers matters relating to the internal layout and the appearance of the residential buildings.

5.6.4 The residential development will deliver up to 585 new homes, comprising a mix of town houses and apartments.

5.6.5 Although not submitted for approval at this stage, an *indicative* mix of units for the residential comprises the following:

Studio	20	3%
1-bed	268	46%
2-bed	268	46%
3-bed	29	5%
TOTAL	585	100%

5.6.6 The application is conditioned such that no more than 5% of units shall be studios, no less than 5% shall be three bed units and no more than 50% shall be 1 bed units.

5.6.7 The Southern Residential will comprise four "tall buildings" that sit above a three storey podium structure that extends across the majority of the southern development area. The residential buildings include two 16 storey buildings (a maximum of 69m above podium), a 24 storey building (a maximum of 96m above podium) and a 32 storey building (a maximum of 123m above podium).

5.6.8 Each of the four residential blocks will have access directly from either Park Lane or Worcester Avenue at street level, and there will also be secondary access points at the plinth level.

5.6.9 There will also be 5 three bedroom townhouses located on Park Lane, with front doors and "garden space" fronting on to the pavement edge.

5.6.10 The residential development will be served by 270 car parking spaces within the podium structure, located at two lower basement levels, ground floor and first floor level. The car park entrance will be on Worcester Avenue. Lifts will connect the car park to all 4 towers. Cycle parking and refuse and recycling will be located in the basement and lower floor levels.

5.7 Flexible Community / Office Space (Use Class D1 and / or B1 applied for in outline)

5.7.1 An area of up to 4000 m^2 of flexible space is proposed within the podium plinth, beneath the residential blocks. This flexible floorspace is submitted for outline approval with matters relating to "appearance" and "landscape" reserved at this stage. Details are submitted for approval in relation to the "layout" and "scale" of the buildings as well as "access".

5.7.2 Permission is sought for the floorspace to be occupied by any one or mix of the following uses: community (Use Class D1) and office (Use class B1).

5.7.3 In the event that a district wide energy centre has not been delivered by the time this element of the scheme comes forward, this area could also be required to accommodate a site wide energy centre in order that the development meets the requirements of the energy hierarchy within the London Plan subject to feasibility and viability.

5.7.4 The floorspace will have access lobbies directly at street level on both Park Lane and Worcester Avenue.

5.8 Community Health building (Use Class D1) (applied for in outline)

5.8.1 The scheme also includes the construction of a new building for D1 use in the north east of the site, fronting onto Worcester Avenue.

5.8.2 The application seeks outline planning permission for this element, with matters relating to "appearance" reserved for approval at a later date. Details are submitted for approval in relation to the "layout" and "scale", "access" and "landscaping".

5.8.3 The building will comprise two storeys above ground, rising to a maximum height of 21m.

5.8.4 The health uses will be located at first and second floor levels. The ground floor of the building will provide servicing space associated with the operation of the Stadium.

5.8.5 Officers are advised that the Club are in discussions with NHS England and a potential operator of the community health building. However this element of the scheme is subject to negotiations achieving a viable proposition for both the Club and a suitable operator. The applicant is not, therefore, in a position to commit to the provision of the community health building through the proposed s106 agreement. Should the health use not come forward the club will be seeking an alternative D1 use for this element of the site. Use for any other use class would require planning permission. Therefore this element of the scheme needs to be given appropriate weight in assessing the public benefits of the proposed scheme.

5.9 The Public Realm (submitted in full)

5.9.1 The application incorporates details of significant changes to the surfacing and appearance of the High Road, Park Lane and Worcester Place roads and footways fronting the site, and the creation of significant new publicly accessible space above the podium to the north and south of the new stadium.
The south podium area in particular is described as a "multi-use" space that incorporates a new public square, which is intended to host a variety of sports and community uses. The application indicates the aspiration for the Tottenham Hotspur foundation to operate a series of programmes and initiatives that will ensure use of the podium space for activities on non match days as well as when events are taking place in the stadium. This will include the integration of some existing programmes, which can be more beneficially delivered on the podium space. The section 106 agreement will secure at least 12 community events per year to be held on the podium for at least six years.

5.10 Summary of Land Uses

5.10.1 The amount of development by use class is set out in the following table:

Land Use	Use Class	Area GIA (sqm)	Units
Leisure (including stadium (including 17,053 sq.m. food and drink uses around half of which is likely to be hospitality)	D2	122,045 (max)	n/a
Residential	C3	49,000	585
Sui Generis / Tottenham Experience	Sui Generis	4,311	n/a
Business	B1/D1	4,000 (max)	n/a
Community and Culture	D1	6,000 (max)	n/a
Hotel	C1	18,820	229 (180 rooms/49 serviced apartments)
Parking & Servicing Spaces	-		1224

5.11 **Environmental Statement**

5.11.1 The applicant did not submit a screening or scoping opinion however the Council is satisfied that the submitted (EIA) covers all necessary matters. The physical form and impacts of the development have been assessed by way of an Environmental Impact Assessment. This demonstrates that subject to mitigations and controls, the development does not give rise to environmental impacts that cannot be satisfactorily addressed so that the principle of the development is not acceptable. The EIA also highlights the forecast economic impacts of the development. The assessment provides a comparative assessment of the economic benefits arising from the proposed development, when compared with the existing position. The assessment concludes that the application has a significant positive economic impact on the locality and positive impact upon London. The non-technical summary is included in the appendices.

5.12 Planning Application HGY/2015/3002 (44 White Hart Lane – Temporary Construction Compound applied for in full)

Proposed development

5.12.1 To facilitate the delivery and construction of the stadium-led development, the Club is seeking to accommodate a construction compound on this application site for a temporary period of 3 years.

5.12.2 The site will principally provide space for the following facilities to be accommodated:

- Site management and welfare facilities for the construction employees will be accommodated within temporary portacabins located to the south of the site and stacked up to three-storeys high. Details of the specification of the portacabins will be provided prior to installation and a limit of three stacked portacabins at a maximum height of 10m is secured by condition.
- A concrete batching plant ((maximum throughput of 400 cubic metres) is to be erected in the northern part of the site.
- Materials storage to be located to the north of the site. A maximum height of 6m is secured by condition.
- The height of plant on site will be limited by condition to 11.5m.
- A 2.4m hoarding will be erected around the perimeter of the site (part has been erected already where the buildings were demolished).

6. SITE AND SURROUNDINGS

NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)

6.1 The application site consists of approximately 8.97 hectares of land located around White Hart Lane Stadium. The site is bounded by Park Lane to the south, Tottenham High Road, to the west, Worcester Avenue to the east and the edge of the completed Phase 1 'Northern Development' of the original planning permission.

6.2 The Northumberland Park area (and Tottenham Hotspur site) is identified as a location where development will be promoted in Policy SP1 of the adopted Strategic Policies DPD. The DPD says the following about Northumberland Park:

▪▪Provision of a mix of land uses including the redevelopment of the football stadium;

▪▪Provision of appropriate residential use, including new build and renewal;

▪▪Provision of appropriate retail and leisure uses;

▪▪Appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;

▪▪High quality, sustainable design that respects its surroundings and preserves and enhances the area's historic environment;

▪▪Improving community safety, including reducing opportunities for crime and anti-social behaviour.

6.3 The application site also has a site allocation (NT5) in the emerging Tottenham Area Action Plan DPD. The proposed allocation is for redevelopment of the existing stadium, including an increased capacity, and the introduction of

residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site. The pre submission draft of the AAP was considered by the Council at its meeting on 23rd November 2015.

6.4 A large section of the site to the north of the existing stadium between Paxton Road and Lilywhite House has been cleared of earlier buildings. Ground works in relation to Phase 2 'Stadium Development' of the original permission are currently underway.

6.5 The rest of the development site is occupied by the existing stadium, single storey club shop building, 3 locally listed buildings and the Grade II listed Warmington House all located at the site's southern end facing the High Road. The redline boundary also includes most of what is referred to as the 'Northern Terrace' a group of statutory and locally listed buildings fronting the High Road and including 796-814 High Road but excluding 792-794 High Road. It should be noted that while these buildings are within the redline boundary this application does not propose any alterations to them, although the applicant does commit to their retention and refurbishment and this will be secured in the Section 106 agreement.

6.6 The western edge of the site is covered by the North Tottenham/Tottenham High Road Conservation Area. The terrace of buildings at 790-812 High Road which backs on to the completed Northern Phase includes four Grade II* listed buildings, five Grade II listed buildings and one locally listed building.

6.7 The redline boundary incorporates much of the public highway surrounding the site, in the High Road, Worcester Road and Park Lane. This land will remain public highway, however the application does propose significant improvements to it. Paxton Road and Bill Nicholson Way will be fully incorporated into the scheme and have already been formally stopped up."

6.8 The site is located in Northumberland Park Ward, an area with significant levels of deprivation and higher rates of unemployment than in the rest of Haringey or London. On the Government's Index of Deprivation (2010) large parts of Northumberland Park and Tottenham were among the 5% most deprived areas in England. Some parts of Northumberland Park are among the 2-3% most deprived areas nationally.

6.9 A small portion at the north-west corner of the site has a Local Shopping Centre designation. The rest of the site and the High Road frontage is covered by Saved Site Specific Policy (SSP13) and the High Road performs many of the functions of a town centre for example accommodating a wide variety of main town centre uses, including a large food superstore, Council Offices, Tottenham Sports Centre and a Public Library. It also accommodates a range of commercial uses located on both sides of the High Road, mainly A1,A2, A3, A4 and A5 uses.

6.10 The administrative boundary with the London Borough of Enfield lies approximately 500m north of the site with Angel Edmonton and the A406 North Circular Road approximately 650m beyond. The Lee Valley and the London Borough of Waltham Forest lie approximately 1.5km to the east of the site. The nearest designated town centre is Edmonton in the London Borough of Enfield approximately 400 m to the north of the site. The designated town centre of Bruce Grove lies approximately 700m to the south of the site with the town centre of Seven Sisters a further 800m south of Bruce Grove. The Metropolitan Centre of Wood Green lies approximately 3km west of the site with Alexandra Palace a further 1.5km beyond. Tottenham Hale, where the Council is proposing to designate a district shopping centre, is located 1.5km to the south.

6.11 The London Liverpool Street to Stanstead Airport/East Anglia railway line, runs north-south to the east of the site with Northumberland Park station approximately 750m east of the site. The London Liverpool Street to Enfield Town/Cheshunt line, recently under the ownership of TfL as part of their Overground service, runs north-south to the west of the site with White Hart Lane station approximately 200m from the site.

6.12 The Public Transport Accessibility Level (PTAL) for the site ranges from 3 (moderate accessibility) on the eastern side to 5 (good accessibility). Bus service No‘s 149, 259, 279, 349 and W3 pass the site frontage along the High Road. The site lies within the Tottenham North CPZ and the much larger The Tottenham Event Day CPZ. Sainsbury operate a large customer car park on Northumberland Avenue.

6.13 Immediately to the east of Worcester Avenue is Northumberland Park Community Secondary School and Saint Paul and All Hallows Church of England Infant and Junior Schools. Immediately to the west of High Road lies St Francis de Sales Roman Catholic infant and junior school and further west is the Lancastrian Primary School.

6.14 The application site forms part of the —North Tottenham Neighbourhood Area” within the emerging Tottenham Area Action Plan and is located within an area identified in the Local Plan as an Area for Change where growth is expected. The application site and the existing planning permission for redevelopment are referred to in the AAP (Policy NT5). This emerging policy reflects the aspirations within the previous permission for a comprehensive redevelopment and sets out the planning requirements for any future applications on the site.

6.15 The area to the west of the Stadium forms part of the proposed NT3 High Road West site allocation in the emerging Tottenham Area Action Plan DPD.

44 White Hart Lane (HGY/2015/3002).

6.16 The site covers an area of 1.02ha (site plan included at Appendix 1).

The site consists of a wedge shaped parcel of land to the north of White Hart Lane covering an area of 1.02 ha. The site has a relatively small frontage on to White Hart Lane. Part of the site is situated in a conservation area. Most of the site is obscured by surrounding buildings and public views of the site are limited. The last use of the site was as a vehicle recovery facility. A Waste Management Licence issued by the Environment Agency on 10th January 2005 (and modified on 7th November 2008) imposed a maximum annual capacity of 24,000 vehicles per year. London Plan Policy 5.17 safeguards existing waste sites, normally requiring a compensatory replacement should a waste site be lost to non-waste use.

6.17 The application site is located within High Road West (NT3) site allocation in the emerging Tottenham AAP which is part of the wider Northumberland Park Area of Change identified within the Local Plan. The High Road West regeneration area envisages a comprehensive redevelopment creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square. A master plan for the High Road West area has been prepared, in consultation with local residents and businesses and was considered by Cabinet at its meeting on the 16 December 2014. The Council's Strategic Regeneration Framework envisages that High Road West will play a key role in delivering the aspirations for regenerating the area.

6.18 The site is bound by B2/B8 industrial warehouses to the east (Peacock Estate) and railway arches supporting an active railway line to the north and west. The extent of the site and its triangle shape is dictated by the railway line that runs north-east to south. The site is bounded to the south east by industrial uses (Carbury Enterprise Park).

6.19 The site was until recently vacant having been previously used as a vehicle scrap yard. A large open-sided sheet metal structure in the centre of the site has been retained. Following the cessation of the scrap use, the applicant has begun storing construction materials removed from the site on the land and have in recent weeks begun to move plant and other equipment onto the site.

6.20 The area surrounding the site to the north and east is predominately industrial and commercial in character. Typical building forms are single storey modern warehousing units and associated yards. 52 White Hart Lane is a locally listed building located immediately to the south, formerly the Station Master's House this building is now owned and operated as offices by the Council. Immediately to the north is a large retail unit that was formerly a Sainsbury's superstore. Immediately beyond that is the new Brook House residential development built on the site of the former Cannon's factory.

6.21 To the south of the site, on the opposite side of White Hart Lane, is the Love Lane Estate, a post war council housing estate, consisting of 4 to 10 storey housing blocks.

6.22 Immediately to the west of the site, beyond the railway viaduct, is Pretoria Road which is comprised of 2-storey terraced dwellings and Haringey 6th Form College.

6.23 The site is accessed via a gated entrance leading onto White Hart Lane, which runs east/west. Approximately 150m east of the site entrance, as discussed, is the junction of White Hart Lane and the High Road.

6.24 Tottenham Hotspur Football Club (THFC) is located approximately 250m east of the site, opposite the junction of White Hart Lane and the High Road.

6.25 Approximately, 20m west of the site is White Hart Lane Train Station. The station provides services into central London and north to Cheshunt and Enfield. White Hart Lane and the High Road are served by multiple bus routes that service destinations throughout north London. Public Transport Accessibility Level (PTAL) of the site is 5 (_Gœd').

6.26 A small part of the site, its frontage to White Hart Lane, lies within the North Tottenham/Tottenham High Road Conservation Area.

7 RELEVANT PLANNING HISTORY

NDP Site (Applications HGY/2015/3000 & HGY/2015/3001).

7.1 The Stadium and associated land have an extensive planning history. The most relevant to the current application are:

HGY/2010/1000 Demolition and comprehensive redevelopment of a stadium (Class D2) with hotel (Class C1), retail (Class A1 and/or A2 and/or A3 and/or A4 and/or A5), museum (Class D1) offices (Class B1) and housing (Class C3); together with associated facilities including the construction of new and altered roads, footways, public and private open spaces; landscaping and related works. Details of "appearance" and "scale" are reserved in relation to the proposed residential and hotel buildings. **Decided 20.09.2011**.

HGY/2010/1001 Conservation Area Consent for demolition of 734-740, 742, 744a, 752a, 752b, 752c, 754-766, 768-772, 776 and 778-788, 806a, 806b High Road, N17, Paxton Hall, Paxton Road, N17, 2-6 Northumberland Park, N17 and any other buildings and structures within the curtilage of these buildings on land bordered by Northumberland Park N17 to the North, High Road N17 to the West, Park Lane N17 to the South and Worcester Avenue N17 to the East within the North Tottenham Conservation Area in conjunction with the comprehensive redevelopment of adjoining land for a stadium with hotel, retail, museum, offices and housing, together with associated facilities including the construction of new and altered roads, footways, public and private open spaces, landscaping and related works. **Decided 20.09.2011**.

HGY/2011/2350 Planning Permission for proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works. **Decided 29.03.2012.**

HGY/2011/2351 Outline Planning Permission for Proposed demolition and redevelopment to provide housing (Use Class C3) college (Use Class D1) and/or health centre (Use Class D1) and/or health club (Use Class D2) together with associated private and public open space, car parking, landscaping and related works; and altered footways, roads and vehicular accesses. Outline application with details of appearance, scale and landscaping reserved for subsequent approval. D**ecided 29.03.2012**.

HGY/2012/0096 Non- material amendment following a grant of planning permission HGY/2010/1000. **Decided 28.02.2012**.

HGY/2013/1973 Variation of condition 42 attached to planning permission HGY/2011/2350 "Proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works", for variation of fourth floor plan to allow for proposed change of use from stadium-related uses to Use Class B1a and associated minor alterations. **Decided 31.03.2014**.

HGY/2013/1976 Variation of condition 42 attached to planning permission HGY/2011/2350 "Proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works", for variation of second floor plan to allow for proposed change of use from stadium-related uses (Use class D2); showroom/brand centre (sui generis), to Class D1 to form a new university technical college and associated minor alterations. **Decided 31.03.2014**.

HGY/2014/2326 Non-material amendment following a grant of planning permission HGY/2013/1976 for variation of condition 3 in relation to rear boundary works. **Decided 26.08.2014**.

HGY/2014/2327 Non-material amendment following a grant of planning permission HGY/2013/1973 for variation of condition 3 in relation to rear boundary works. **Decided 26.08.2014**.

HGY/2015/0797 Application for approval of reserved matters relating to the scale of buildings in Phase 3 – the Southern Development' granted outline permission (HGY/2011/2351) for the redevelopment of site to provide housing (Use Class C3), college (Use Class D1) and/or health centre (Use Class D1) and/or health club (Use Class D2) together with associated private and public open space, car parking, landscaping and related works. This application is pending.

HGY/2015/0964 Application under Section 73 of the Town and Country Planning Act 1990 for a minor material amendment to Planning Permission Reference HGY/2010/1000 granted on 21 September 2011 for: Demolition and comprehensive redevelopment of a stadium (Class D2) with hotel (Class C1), retail (Class A1 and/or A2 and/or A3 and/or A4 and/or A5), museum (Class D1) offices (Class B1) and housing (Class C3); together with associated facilities including the construction of new and altered roads, footways, public and private open spaces; landscaping and related works. Details of "appearance" and "scale" are reserved in relation to the proposed residential and hotel buildings. The minor material amendment being sought is a variation to Condition 1 (Approved Drawing Numbers) added by non-material amendment (Ref: HGY/2011/2200) to provide a new basement level beneath the approved stadium in order accommodate some of the already consented car parking spaces proposed at ground floor level, as well as plant and storage areas, and amendments to the consented ground floor layout to allow for extended player changing facilities, enhanced media facilities and other associated stadium uses. No changes are proposed to the external appearance or the height, scale and mass of the consented stadium. The application also proposes removal of conditions: 1, 3, 5, 6, 7, 8, 11, 12, 13, 14, 15, 19, 24, 25, 26, 27, 28, 29, 31, 33, 34, 35, 36, 37, 38, 39, 43, 44, 45, 47, 48, 49, 60, 61, 62 and 63 , and variations to conditions 2, 30, 54 and 58 of planning permission reference HGY/2010/1000. **Decided 22.06.2015**.

7.2 In addition to the above all pre-commencement conditions relating to the Phase 1 – Northern Development' and Phase 2 – Stadium Development' have been discharged.

44 White Hart Lane (HGY/2015/3002).

7.3 There is no planning history relating to the majority of the site and its previous use as car breakers. The site did have three small single storey commercial/shop units fronting White Hart Lane which were recently demolished:

HGY/2015/1352 Prior Approval not required for the demolition of 48-50 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015**.

HGY/2015/1353 Prior Approval not required for the demolition of 44 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015**.

HGY/2015/1354 Prior Approval not required for the demolition of 46 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015**.

8 CONSULTATION

NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)

Haringey Quality Review Panel The scheme was presented on 15th July 2015, and a follow up presentation was held 21st October 2015. The Panel Notes are attached in the Appendices.

Haringey Development Management Forum was held on 15th July 2015. 46 people attended the Forum. Matters raised included impact on heritage, tall buildings, level of affordable housing, impact on the amenity of local residents from the current stadium as well as the proposal, viability, disclosure of the viability assessment and transportation.

The following were consulted regarding the application:

Internal:

LBH Transportation Group (including the Highway Authority)
LBH Head of Carbon Management
LBH Sustainability
LBH Economic Regeneration
LBH Economic Development
LBH Tottenham Team
LBH Conservation Officer
LBH Flood and Surface Water
LBH Cleansing (Refuse & Recycling)
LBH Licensing
LBH Food & Hygiene
LBH EHS - Noise & Pollution
LBH Nature Conservation
LBH Education

External:

Greater London Authority
London Fire Brigade
Metropolitan Police
Transport for London

Environment Agency
Natural England
Thames Water
Sport England
Historic England
Greater London Archaeology Advisory Service
The Victorian Society
Georgian Group
Council for British Archaeology
Twentieth Century Society
Ancient Monuments Society
Society for the Protection of Ancient Buildings

Neighbouring Boroughs:

L. B. Hackney
L. B. Enfield
L. B. Waltham Forest
L. B. Barnet
L. B. Islington
L. B. Camden

Local Groups:

Tottenham CAAC
Tottenham Civic Society
Headcorn and Tenterden Resident Association
Love Lane Residents Association
High Road West Business Steering Group
Northumberland Park Residents Association
The Lindales and Bennetts Close Residents Association
Tottenham Traders Partnership
Tottenham UTC

The responses are set out in a table in the Appendices and summarised as follows:

Internal:

1) LBH Conservation

The comments of Haringey's Conservation Officer are dealt with in section 10.4 and 11.5 of this report.

2) LBH Transportation

The comments of Haringey's Transportation Officer are dealt with in section 10.5 of this report.

3) LBH Carbon Management

In appendices, requires conditions and obligations.

4) LBH Air Quality

In appendices, requires conditions and obligations.

External:

5) **The Victorian Society:** Object to the loss of the locally listed buildings which make an important contribution to the streetscape, the history of the area and indeed the history of the football club. The new stadium is out of keeping with the scale and character of the area. Retaining and refurbishing the locally listed buildings would represent an enhancement of the Conservation Area, which is a requisite of the NPPF, and would go some way in mitigating the dramatic impact the new stadium will have on many other heritage assets.

6) **Thames Water**: No objections raised but recommend standard conditions and informatives relating to surface water drainage, ground water discharge, sewage connections, effluent discharge, water supply and measures to protect local water and sewage infrastructure during construction.

7) **Natural England**: No objections. The response refers to standing advice to Protected Species and suggestions are made for Biodiversity and Landscape Enhancements.

8) **London First:** Supports the proposal. The proposal has the potential to be a catalyst for the regeneration of the wider area

9) **Historic England**: , Objects: *Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to preserve the setting of a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done.*

10) **Historic England -The Greater London Archaeological Advisory Service (GLAAS):** No objections raised. The proposal is unlikely to have a significant effect on assets of archaeological interest.

11) **Metropolitan Police**: Support the scheme as a whole. Extensive consultation between the relevant stakeholders has benefitted the proposed designs in delivering safer, more secure facilities. With ongoing consultation on designing out crime and approved protective security measures, the facilities should achieve the required standards. With regard to the proposed residential parts of the scheme, recommend that a planning condition be imposed requiring the residential parts of the scheme comply with Secured by Design standards.

12) **Environment Agency:** No objection subject to the approval of the Lead Local Flood Authority (LB of Haringey). Provide advice to LBH Senior Drainage Engineer on matters relating to Surface Water Drainage, Flood Defence and on Groundwater and Contaminated Land.

13) **Council for British Archaeology:** Object to the loss of heritage assets and destruction of the street scene. Although the new stadium may be claimed to outweigh these disadvantages on the grounds of community use/benefit, it would be possible to provide a new stadium without destroying local character.

14) **London Fire and Emergency Planning (London Fire Brigade):** Having initially raised concerns about the scheme the Brigade are now satisfied with proposals for fire fighting access.

15) **Save Britain's Heritage:** Object to the loss of the three locally listed buildings. Do not agree that their demolition is the only way of resolving crowd safety issues. Would withdraw their objection if the scheme is revised to retain the buildings as part of the wider development.

16) **GLA/Mayor for London:** The application was referred to the Mayor under the requirements of the Mayor for London Order 2008. The officer‘s report set out that proposal was supported in principle, the provision of new sporting and recreations facilities was strongly supported, that the design was of high design quality and potentially iconic, that the development benefits had the potential to outweigh the substantial harm caused by the demolition of the locally listed buildings if the dispensary facade was reprovided in the Tottenham Experience and further information was sought on in particular climate change. The Mayor however took a different view to Officers on the locally listed buildings and set out in the covering letter that these buildings should be retained.

The Stage 1 response and report are also attached in full in the appendices of this report.

17) **TfL:** Transport for London‘s response to the application is dealt within in the main body of this report and is attached in full in the appendices of this report.

44 White Hart Lane (Application HGY/2015/3002)

The following were consulted regarding the application:

Internal:

LBH Transportation
LBH Tottenham Team
LBH Conservation Officer
LBH Flood and Surface Water
LBH Cleansing (Refuse & Recycling)
LBH EHS - Noise & Pollution
LBH EHS - Contaminated Land
LBH Emergency Planning

External:

The Victorian Society
Met Police - Designing Out Crime Officer
Transport for London
Georgian Group
Environment Agency
Historic England
Metropolitan Police
Network Rail

Neighbouring Boroughs:

L. B. Enfield

Local Groups:

Tottenham CAAC
High Road West Business Steering Group
Tottenham Traders Partnership
Love Lane Residents Association
Northumberland Park Residents Association
Tottenham Civic Society

The responses are summarised as follows:

Internal:

18) LBH Conservation

No harm caused given the temporary nature of the use.

19) LBH Transportation

The comments of Haringey's Transportation Officer are dealt with in section 11.3 of this report.

External:

20) **Environment Agency:** No objection subject to the approval of the Lead Local Flood Authority (LB of Haringey). Provide advice to LBH Senior Drainage Engineer on matters relating to Surface Water Drainage, Flood Defence and on Groundwater and Contaminated Land.

21) **GLA/Mayor for London:** The application was referred to the Mayor under the requirements of the Mayor for London Order 2008. At Stage One the Mayor responded to say that the application did not raise any strategic issues.

9 LOCAL REPRESENTATIONS

NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)

9.1 These applications were originally publicised by way of 20 site notices, a notice in the newspaper on 18th September 2015 and 2,024 letters to homes in Almond Road, Argyle Road, Brereton Road, Bromley Road, Chapel Place, Church Road, Commonwealth Road, Coniston Road, Gascoigne Close, Harpers Yard, High Road, James Place, King Street, Kings Road, Lancaster Close, Love Lane, Moselle Place, Moselle Street, Northumberland Park, Orchard Place, Park Lane, Park Lane Close, Ruskin Road, St Pauls Road, Sutherland Road, Taylor Close, Trulock Road, Vicarage Road, White Hart Lane, Whitehall Street, William Street and Worcester Avenue The application has also been highlighted on the Planning Service Web pages (part of the Council Web site) since the 18th September.

9.2 Following the submission of further information in support of the application the Council re-consulted all previous consultees in accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) on the 13th November 2015. This included new site notices and a press notice.

9.3 The number of representations received from neighbours, local groups etc in response to both of these notifications and publicity of the application is, as of 30 November 2015:

No of individual responses: 117
Objecting: 45
Supporting: 98
Others: 28

9.4 The following groups/societies/organisations made representations:

- Tottenham CAAC (obj)
- Tottenham Conservation (obj)
- Tottenham Business Group (obj)
- Out Tottenham Network (obj)
- Friends of Alexandra Park
- Haringey Sports Development Trust (sup)
- Tottenham Hotspur Supporter‘s Trust (sup)
- Gladesmore Community School (sup)
- Brook House Primary School (sup)
- Barnet and Southgate College (sup)
- Haringey Mencap (sup)
- Newlon Housing Trust (sup)
- UEFA (sup)
- Epping Forest College (sup)
- Barnet Southgate College (sup)
- London First (sup)
- Brooke House Primary School (sup)
- NFL (sup)
- Lea Valley Regional Park Authority (sup)
- Tottenham Business Group (obj)
- Save Britain‘s Heritage (obj)
- Lammas (obj)

9.5 No Councillors made representations.

9.6 The following issues were raised in representations from the local community and local groups that are material to the determination of the application and are addressed in the next section of this report. The main issues raised are also responded to in a table included in the appendices.

<u>Support</u>

- Will benefit the local economy.
- Will improve and regenerate a rundown area.
- The proposals look great.
- Will be the most advanced sports venue in the world.

- While the loss of the locally listed buildings is a shame the benefits of the new buildings will outweigh their loss.
- Proposal will provide a year round 7-day a week visitor attraction.
- The stadium attracted a crowd of 75,038 in 1938, if the transport infrastructure could cope back then, it won't have any difficulty coping now.
- NFL and extreme sports will attract more visitors.
- Will provide additional housing.
- Will provide a new community health centre.
- The narrow pavement in front of the locally listed building cannot accommodate crowds of 30,000 so won't be able to accommodate 61,000.
- Will provide more opportunities for community programmes.

Objection

- Loss of locally listed buildings.
- Proposal does not preserve or enhance the character of the area and is a vanity project.
- Proposals will be harmful to the Listed Building (Warmington House) and its setting.
- Will lead to the demolition of neighbouring social housing and the _social cleansing' of the area.
- Loss of local businesses.
- Most local businesses will not benefit from the development and indeed may be squeezed out.
- Buildings are too tall and will dominate the skyline.
- Buildings are overbearing and will overshadow neighbours, reducing their daylight and sunlight.
- There hasn't been enough consultation with the local community.
- Disruption and nuisance from the construction of the development.
- Insufficient affordable housing
- Football stadium blight the area through congestion and the behaviour of football supporters.
- Impact on public transport in the area.
- Impact on parking and loading in the area.
- Proposal's energy strategy does not provide enough renewable energy or enough carbon savings

Comments

- Qualified support if the applicant does as the Mayor asks and retain the locally listed buildings.
- Should include more affordable housing.

44 White Hart Lane (Application HGY/2015/3002)

The application has been publicised by way of 2 site notices, a notice in the local press on the 25th September 2015 and 863 letters.

Local representations

9.7 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 24
Objecting: 24
Supporting: 0
Others: 1

9.8 No groups/societies made representations.

9.9 Councillor Bevan made two representations:

„I am very concerned as to this proposal as this is a very narrow main road with many bus routes. It is also yellow lined with double and single yellow lining. It also has obscured vision due to nearby bends in this road. There is often a tail back of traffic, past the entrance to this site, from the traffic lights at the junction with Tottenham High Road. White Hart Lane and the entrance to this site seems very narrow considering the size of the vehicles that could be using this construction site. I await the input of Highways management into this consultation."

„I am aware from the local residents on line comments that they have other issues in addition to those mentioned in my first response. Please ensure that they are fully considered before taking a decision on this application."

9.10 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report.

Objections

- The proposed site is no longer 'Industrial' in nature, over 100 new residential units have recently been built - the Rivers Apartments building and the new blocks of flats on Cannon Road which will be seriously affected by the noise levels. (Officer comment- the site is still allocated as industrial)
- Adverse impact on the highway safety.
- Will add traffic to an already congested junction.
- White Hart Lane and the entrance to this site seems very narrow considering the size of the vehicles that could be using this construction site.
- Impact of noise on nearby residential properties.
- The new flats in Rivers Apartments already suffer noise from the adjacent railway and existing industrial uses in the area.
- Impact of working into the evenings and at weekends on neighbouring residents.

- Dust, particulates and general pollution.
- The proposal is purely for Tottenham Hotspur to save money which does not justify the harm it will cause.
- Proposal will disturb residents sleep.
- Questions the objectivity of the noise report submitted with the application.
- Impact on the mental health of residents.
- 3 years is not a temporary period.
- Will not allow residents to enjoy their balconies.
- Impact on bus journey times.
- The construction compound should be moved to an industrial area which there are many of in Haringey.

General comments

- While no comments were received in support of the compound a resident did voice their support for the regeneration of the area and stated they would not object to proposal if it was restricted to weekday and normal daytime working.

10.0 MATERIAL PLANNING CONSIDERATIONS

NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)

The main planning issues raised by the proposed development are:

1. Principle of the development
2. Regeneration
3. Design
4. Heritage
5. Transport
6. Energy/Sustainability
7. Air Quality
8. Daylight/Sunlight
9. Microclimate
10. Noise
11. Amenity
12. Ecology
13. Equalities
14. Conclusion

10.1 PRINCIPLE OF DEVELOPMENT

NPPF

10.1.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to —drive and support development" through the local

development plan process and supports —approving development proposals that accord with the development plan without delay". The NPPF also expresses a —presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking".

10.1.2 The NPPF has 12 core planning principles., These include clear statements about the importance of a plan led approach, and the need to plan creatively, and actively to promote growth whilst considering local characteristics, securing high quality design and amenities and supporting the move to a low carbon economy, whilst optimising land use and densities and conserving and respecting heritage interests.

10.1.3 The NPPF encourages the ‗effective use of land by reusing land that has been previously developed'. In respect of applications that include provision of housing, the NPPF highlights that delivery of housing is best achieved through larger scale development.

10.1.4 Paragraphs 126 to 141 meanwhile contain the heritage specific policies in the NPPF. The objective of these policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance. That significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence but also from its setting. These are dealt with in more detail in the Heritage section of this report.

The Development Plan

10.1.6 For the purposes of S38(6) of the Act the Development Plan consists of the London Plan, Haringey's Local Plan Strategic Policies and the saved policies of Haringey's Unitary Development Plan. The Council is consulting on the Alteration to its strategic polices document and a new suite of documents including the Tottenham Area Action Plan and Development Management Polices DPD. The Council is also working with the authorities of North London on a Joint Waste Local Plan DPD. Consultation on the preferred option took place in July 2015 and the project team are considering responses to the consultation exercise, in anticipation of publication of a pre-submission draft of the document in spring 2016. The policies of that draft document seek to safeguard existing waste sites from development for alternative uses. The site at 44 White Hart Lane is a waste site. The waste local plan can, because it is at an early stage in its preparation, only be assumed to carry very limited weight insofar as it engages with the development proposed. .

London Plan

10.1.7 The London Plan (2015) sets a number of objectives for development through various policies which are set out below:

- To promote and enable growth within London (Policies 2.7 and 4.1).
- To promote growth in Opportunity Areas (this site lies within the Lee Valley Opportunity Area)
- Supporting the diverse range of professional sporting and entertainment enterprises along with the cultural, social and economic benefits that they offer to residents, workers and visitors (Policy 4.6).
- To support bringing forward capacity for retail, commercial, cultural and leisure development in town centres (Policy 4.7).
- To recognise the importance of increasing housing supply and choice (Policy 3.3), optimising housing output (Policy 3.7) and include complementary non-residential uses within large residential developments (Policy 3.7).
- Creating mixed communities through meeting needs and fostering social diversity (Policies 3.1 and 3.9) and through providing affordable housing (Policy 3.10).
- Seeking to reinforce qualities of heritage assets in order to stimulate regeneration (Policy 7.9).
- To create lifetime neighbourhoods through designing to interface with surrounding land (Policy 7.1) and achieve high standards of accessible and inclusive design (Policy 7.2).
- To support high density development relative to accessibility and public transport capacity (Policy 6.1).

Haringey Local Plan Strategic Policies (2013)

10.1.8 Haringey‘s Local Plan Strategic Policies document highlights the importance of growth areas within the Borough. The Local Plan designates Northumberland Park as an area for regeneration and this includes the redevelopment of the Football Club and Seven Sisters Corridor.

10.1.9 Policy SP1 of the Local Plan relates to managing growth within the Borough and states that the Council will focus on suitable locations to ensure that achieve strong, healthy and sustainable communities. The Site is located within the Northumberland Park Area of Change within the Local Plan which specifically highlights capacity for further growth.

10.1.10 The Local Plan sets out the future aspirations for Northumberland Park as follows:

- ▪Provision of a mix of land uses including the redevelopment of the football stadium;
- ▪Provision of appropriate residential use, including new build and renewal; Provision of appropriate retail and leisure uses;
- Appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;

- High quality, sustainable design that respects its surroundings and preserves and enhances the area‘s historic environment;
- Improving community safety, including reducing opportunities for crime and anti-social behaviour.

10.1.11 Other relevant policies are as follows:

- SP2-Affordable housing- borough target of 50% with maximum reasonable amount in individual sites
- SP4 Working towards a Low Carbon Haringey
- SP5 Water Management and Flooding
- SP6 Waste and Recycling
- SP7 Transport
- SP8 Employment
- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion
- SP10 Town Centres
- SP11 Design
- SP12 Conservation
- SP14 Health and Well-Being
- SP15 Culture and Leisure
- SP16 Community Facilities

Haringey Saved UDP Policies

- UD7 Waste Storage
- ENV5 Works affecting the Water Course
- ENV6 Noise Pollution
- ENV7 Air, Water and Light Pollution
- EMP5 Promoting Employment Uses
- TCR2 Out of Town Centre Development
- TCR3 Protection of Shops in Town Centres
- TCR4 Protection of Local Shops
- TCR5
- M10 Parking for Development
- SSP13 White Hart Lane Stadium

Haringey Saved Policies SSP13

10.1.12 Site Specific Policy 13- White Hart Lane Stadium, High Road, N17. Existing use: Football stadium, retail and Employment Proposal: Expansion. Including better facilities and mixed use development, including residential & possibly a hotel.

Emerging Tottenham Area Action Plan December 2015

10.1.13 The pre submission draft of the AAP was considered by the Council at its meeting on 23rd November 2015 and was agreed for publication. As such the AAP is considered to be a material planning consideration that can be accorded some, although not the same weight as the development plan. The document provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted Strategic Polices DPD and the suite of DPDs' emerging alongside the Tottenham AAP to articulate the spatial vision for growth.

10.1.14 Policy AAP1 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved. It also places a responsibility on the Council to proactively work with landowners, the Mayor of London, the local community and other parties to help deliver the aims of the AAP. These aims include:

- To reduce social inequalities.
- Improve the quality and supply of housing to meet housing needs;
- Improve health and wellbeing.
- Create a diverse and sustainable economy.
- To deliver the necessary infrastructure to support change in Tottenham;
- To improve the local environment, reduce carbon emissions and adapt to climate change.

10.1.15 The Council expects all development proposals in the AAP area to come forward as part of wider comprehensive redevelopment proposals, taking account of adjacent uses (existing or proposed) and neighbouring landowner expectations.

10.1.16 The application site is located within the heart of the North Tottenham Neighbourhood Area for which there are a number of site allocations, incorporating the site and adjacent land. They are set below:

<u>NT7: Tottenham Hotspur Stadium</u>

10.1.17 This site allocation has been identified for the redevelopment of the existing football stadium in order to increase match day capacity along with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.

10.1.18 The AAP states that for any future application for the site, the Council would seek:

- Comprehensive redevelopment of the site;
- High quality design;

- Increase in residential on the site;
- Complementary leisure and commercial uses;
- Support regeneration objectives to the east of the site with suitable interfaces;
- High quality public accessible spaces on non-match days; and
- Address the statutory presumption in favour of retaining heritage assets unless justifiable;
- Improved connectivity between east and west.

NT4: Northumberland Park

10.1.19 Proposed allocation is for the masterplanned development of the area to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include the provision of additional high quality housing with an increased range of types, sizes, and tenures, improvements to existing housing stock, new public spaces and new community infrastructure.

10.1.20 The site requirements as set out within the AAP states that:

- Development will be in conformity with any future adopted masterplan for the area.
- Redevelopment will create more, new, and better housing with greater diversity of scale and tenure and type, and will contribute to the creation of a Family Housing Area.
- Existing east-west routes will be enhanced, including Park Lane as a pedestrian and cycling friendly route and Local Centre, connecting Tottenham High Rd and the Lee Valley Regional Park. Bus routes will be improved through the area and link with Northumberland Park Station.
- A fine graining of the road network in the area will be created with the aim of increasing permeability. There will be a strong focus on creating new north-south streets and new streets must connect to existing streets to the north and south of the area, and to new spaces proposed around the new stadium development to the west.
- Retention of good housing stock where appropriate.
- Taller buildings will be located at the south east corner of the site as part of the proposed Northumberland Park tall buildings cluster, and in the west and south west of the site adjacent to the stadium development.
- Small scale commercial development along Park Lane and at Northumberland Park Station. Any commercial should not detract from the main aim of concentrating town centre uses on the High Road.
- New health infrastructure will be provided within the area.
- Education infrastructure will be enhanced including the provision of a new through school within the Masterplan area.

NT5: High Road West

10.1.21 The overall High Road West site allocation has been masterplanned by Arup for comprehensive redevelopment creating a mixed use neighbourhood including a new public realm linking White Hart Lane Station and the redeveloped football stadium as well as an expanded local shopping centre for the High Road.

10.1.22 The site requirements as set out within the AAP states that there will be:

- A minimum of 1,400 new homes with a mix of tenure, type and unit size;
- Creation of a new connection between White Hart Land Station, the High Road and redeveloped football stadium;
- An increase in the quality and quantity of community facilities;
- Sympathetic development to heritage assets which should seek to enhance the overall viability and attractiveness of future investment for heritage buildings in the area;
- New transport improvements delivered including new entrance to White Hart Lane Station

Alterations to Strategic Polices DPD

10.1.23 The proposed changes to Haringey's Strategic Policies reflect a number of changes in the overarching planning framework at the national and regional level, which affect planning locally. The most significant being the adoption of the Further Alterations to the London Plan (FALP) that significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. The plan also reflects the more challenging position in respect of affordable housing delivery.

10.1.24 The pre-submission draft of the proposed changes to Haringey's Strategic Policies were considered by the Council at its meeting on 23rd November 2015 and were agreed for publication. The document can therefore be afforded some weight.

10.1.25 The changes to the following strategic policies and draft DPD's are relevant to this application:

Policy SP1: Managing Growth, raises Haringey's strategic housing requirement to 19,802 net new homes between 2011 – 2026 (rather than 8,200 between 2011-2026). The amended policy also elevates the Northumberland Park Area of Change to a Growth Area and renames it the North Tottenham Growth Area' which includes Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium, and High Road West). The number of new homes expected to be accommodated in the Council's Growth Area's (Haringey Heartlands/Wood Green; Tottenham Hale and North Tottenham) is also increased to 13,500 to 2026.

Policy SP2: Housing, is amended to reflect the increased housing target in SP1 and reduces the strategic affordable housing target from 50% to 40%.

Policy SP8: Employment, reduces the forecast demand of new industrial floorspace from 137,000 m^2 to 23,000m^2.

Draft Development Management Polices DPD

This document introduces a set of detailed planning policies which give effect to the Spatial vision for the borough. The DM DPD updates local thematic planning policies for the borough, superseding the 2006 Unitary Development Plan, and a suite of Supplementary Planning Documents and Guidance notes. It will be used in the determination of planning applications in the borough. The pre submission draft of the DM DPD was considered by the Council at its meeting on 23rd November 2015 and agreed for publication. The document can therefore be afforded some weight.

There are five main chapters in the document, each providing a set of policies covering the topics of Development and Design, Housing, Environmental Sustainability, Employment and the Economy, and Community Infrastructure. A substantial number of Policies are considered relevant to consideration of these applications reflecting changes in national policy as well as the outcome of the evidence based studies undertaken by the Council since the adoption of the previous plan. Amounting to a comprehensive suite of —development management polices" for the whole borough, and supplemented by the specific polices of the Tottenham AAP, the following are all considered to be relevant to the determination of the application:

Design & Character
DM1 Delivering High Quality Design (Haringey's Development Charter)
DM2 Accessible and Safe Environments
DM3 Public Realm
DM4 Provision and Design of Waste Management Facilities
DM5 Locally Significant Views and Vistas
DM6 Building Heights
DM9 Management of the Historic Environment

Housing
DM10 Housing Supply
DM11 Housing Mix
DM12 Housing Design and Quality
DM13 Affordable Housing

Environmental Sustainability
DM19 Nature Conservation

DM21 Sustainable Design, Layout and Construction
DM22 Decentralised Energy
DM23 Environmental Protection
DM24 Managing and Reducing Flood Risk
DM25 Sustainable Drainage Systems
DM26 Critical Drainage Areas
DM27 Protecting and Improving Groundwater Quality and Quantity
DM29 On-Site Management of Waste Water and Water Supply

Transport & Parking
DM31 Sustainable Transport
DM32 Parking

Employment & Town Centres
DM37 Maximising the Use of Employment Land and Floorspace
DM38 Employment led Regeneration
DM41 New Town Centre Development
DM44 Neighbourhood Parades and other non-designated frontages
DM45 Maximising the Use of Town Centre Land and Floorspace

Community Infrastructure, Implementation & Monitoring
DM48 The Use of Planning Obligations
DM49 Managing the Provision and Quality of Community Infrastructure
DM53 Hotels and Visitor Accommodation
DM55 Regeneration and Masterplanning

The assessment of the application has had regard to these emerging policies.

10.1.26 Urban Characterisation Study (part of the Local Plan evidence base)

- Published in February 2015 as an evidence base for Haringey‘s Local Plan documents, the Haringey Urban Character Study is not adopted policy but is a useful guide for assessing development. It is intended to provide an objective, thorough and analytical outlook of the borough. It identifies the components of local character and distinctiveness and highlights those aspects which make Haringey unique. It will guide decisions on the location, type and form of new, including the location of tall buildings. The study evaluates and builds upon the existing evidence base, including conservation area appraisals, Upper Lee Valley OAPF, Open Space Strategy and other relevant documents.

- In addition to being a formal evidence base to Haringey‘s planning documents, the study can be utilised as a general urban design reference document.

- The sensitive heritage asset of the High Road continues to make it unsuitable for buildings that would be out of character; a prevailing maximum height of 3-4 storeys with perhaps one or 2 recessed additional floors, should be followed in any new build sites, whilst care to protect, repair and reinstate existing 3-4 storey terraces should be taken.

- However the study states that the sole exception could be around the Spurs Stadium, where the existing stadium is equivalent to 7-8 storeys in height; it is expected a new stadium of equivalent or slightly higher height and associated development can be accommodated, and it is possible that as part of an agreed masterplan a similar height could be matched on development immediately to the east of the stadium, in the heart of the city block, and a similar distance from the High Road to the west, directly opposite the stadium. Care should particularly be taken though not to harm the character of Park Lane and Church Road.

10.1.27 Other Relevant Publications/Documentation

In addition to the Development Plan the area has been the focus of considerable public sector attention over the last 10 years, which has culminated in the production of a number of non statutory publications prepared following significant community engagement.

10.1.28 Upper Lea Valley Opportunity Area Planning Framework (SPG to the London Plan)

- The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) covers over 3,000 hectares of land covered by the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney and was produced by the GLA. The OAPF sets out the overarching framework for the area which includes the Site. The objectives for the Upper Lee Valley are set out as follows:
- Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leeside and Ponders End.
- Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park.
- Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities.
- Over 20,100 new well designed homes by 2031.
  Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments.
- A Lee Valley Heat Network linked to the Edmonton Eco Park.

- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area.
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife.
- This site sits within the A10/A1010 corridor and in Northumberland Park. Tall buildings are promoted around the new Spurs stadium.
- The ambitions for the area are that it becomes a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.
- In particular, the section relating to Tall Buildings highlights that the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London‘s character and help to provide a catalyst for regeneration.
- The OAPF proposes that future tall buildings will be in well-defined clusters in areas identified for urban growth including the new stadium for Tottenham Hotspur. By locating tall buildings in these area, the OAPF highlights that their impact on conservation areas and listed buildings will be limited.

10.1.29 The Physical Development Framework for Tottenham (2012)

- The Tottenham Physical Development Framework (PDF) was produced by Arup in 2012 for Haringey Council and highlights the scale of the opportunities within the Borough. The document was not consulted upon or adopted by the Council as planning policy and as such has no weight in planning terms. In particular, Tottenham is noted for having good transport links, being a destination of choice due to the rich heritage, accessibility to parks including Lee Valley Park as well as being home to Tottenham Hotspur Football Club. As such, there are substantial development opportunities within the Borough.

- The Framework considers Tottenham as one of London‘s key areas for growth and regeneration. It is expected that prior to 2025, there will be 5,000 new jobs, 10,000 new homes and more than 1 million sq ft of new employment and commercial space. These figures include proposals for a new stadium at the Site and the PDF notes that this will act as a catalyst for change.

10.1.30 The Tottenham Strategic Regeneration Framework (2014)

- The Tottenham Strategic Regeneration Framework (SRF) prepared for Haringey Council sets out the vision for the future of Tottenham by outlining the key strategies that will be used to revitalise the area.

- The SRF highlights that the Football Club along with regeneration proposals for High Road West are undergoing significant change to create new residential neighbourhoods supported by leisure and commercial developments.

- This document, alongside the PDF, has been used to inform the emerging Tottenham Area Action Plan which is discussed below.

- The application comprises a mix of new and replacement uses for the site, arranged around a new sports (primarily football) stadium. The proposed uses include a number of "town centre" uses (retail, office, food and beverage, Tottenham Experience, hotel), which in this case aim to support the significant influx of dedicated visitors attracted to the site to either watch the sporting and leisure events within the stadium or enjoy the stadium facilities on non event days. These uses are supported in principle, and are discussed further below, subject to further detailed considerations in the rest of the report.

10.1.31 The Urban characterisation Study (2015) highlights the mixed character of the surrounding area, some of which is a conservation area, and which contains some Listed Buildings. The characteristics of the conservation area and heritage assets within it do not prevent, as a matter of principle, new development from taking place. Indeed, the earlier permission demonstrates that replacing the existing stadium with new development can be acceptable in principle. This application has a different impact upon the heritage assets in the area and the proposal's impact in this regard is considered later in the report.

10.1.32 Haringey's Local Plan identifies the Site as part of the wider regeneration of Northumberland Park. As such, the Site is highlighted as being suitable for a variety of land uses. The specific land uses and redevelopment of the Site is set out clearly within the emerging Tottenham AAP which identifies the Site for comprehensive redevelopment as highlighted above. The area and site is also identified as an area for growth in both the London Plan and the Upper Lee Valley Opportunity Area Planning Framework.

10.1.33 As is set out above, the principle of the redevelopment of the stadium, and extensive development in the surrounding area is established in development plan policy and emerging planning policy for the area. The site lies within the OAPF as defined in the London Plan, and strong policy support for the regeneration of the area follows from this designation. The OAPF policy, as well as other London Plan policies, amongst other matters support high density development, including tall buildings within the area of the OAPF. The principle of each element of the proposal is dealt with below:

The Stadium

10.1.34 Strategic Policy SP1 of the Local Plan promotes development in the Northumberland Park Area of change. The Council's aspirations for Northumberland Park as set out in Chapter 3 of the Local Plan Strategic Policies

includes the provision of a mix of land uses including the redevelopment of the football stadium'.

10.1.35 London Plan Policy 4.6 'Support for and Enhancement of Arts, Culture, Sport and Entertainment' supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors. Policy 4.6 also requires a sequential approach to be fulfilled, that development should be located on sites with good existing or planned access to public transport, be accessible to all sections of the community, and addresses deficiencies in facilities. The submitted Transport Assessment demonstrates that the new stadium is acceptable in transport terms, this is discussed in more detail later in the report. Given the club's long historic association with the site it is considered beneficial that it stays in the area. The proposed stadium also improves access for disabled visitors. Through the s106 agreement residents of Haringey and Enfield will be given first refusal on a proportion of tickets for all events, making the new stadium accessible to all sections of the community.

10.1.36 Proposed site allocation NT7: Tottenham Hotspur Stadium in the emerging Tottenham AAP supports the redevelopment of the existing football stadium in order to increase match day capacity along with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.

10.1.37 The provision of enhanced stadium facilities in this growth area is in line with regional and local policy and is accordingly acceptable in principle.

Tottenham Experience

10.1.38 The Tottenham Experience will accommodate a wide range of club-related uses that are not considered to easily fall within any defined use class and include the following elements:

- Club Shop (1955 m^2)
- Ticket office & booths (242 m^2)
- Cafe (260 m^2)
- Roof walk reception and changing (100 m^2)
- Museum (728 m^2)
- Club cinema (400 m^2)
- Warmington House
- Roof top terraces.

10.1.39 In the application the Tottenham Experience is defined a sui-generis use. While officers agree with this definition the mix of uses proposed are nonetheless of the type that you would normally find in a town centre. This is also the case with

some of the other proposed uses dealt with below. The concept of the Tottenham Experience is consistent with the site specific and area based aspirations set out in adopted and emerging policy. The appropriateness of the proposed mix of uses is dealt with below under a separate heading.

Extreme Sports

10.1.40 London Plan Policy 3.19 ‗Sports Facilities' supports development proposals that increase or enhance the provision of sports and recreation facilities, as does Policy 4.6 ‗Support for and Enhancement of Arts, Culture, Sport and Entertainment' . Policy 4.6 also requires a sequential approach to be fulfilled, that development should be located on sites with good existing or planned access to public transport, be accessible to all sections of the community, and address deficiencies in facilities.

10.1.41 The Extreme Sports Centre will also increase access to sports and recreational facilities, with opportunities to develop activities directly linked to the curriculums of local schools and colleges. The application states that the Club is committed to agreeing community access to the extreme sports, allowing schools free use of the facilities. The number of days and the number of schools to which this offer will be extended will be subject to a community access plan to be secured by s106 agreement.

10.1.42 The Extreme Sports Centre will also work in combination with a range of sports and recreational uses that will operate from the podium public space to the north, including the multi-use games area. This will also contribute to London Plan Policy 3.2 ‗Improving Health and Addressing Health Inequalities' in an area that suffers from high rates of obesity and other health problems. The proposed sports and recreation facilities are supported in line with London Plan policies.

10.1.43 It is recognised in the Local Plan that the Tottenham area suffers from high levels of adult and child obesity, as well as other diseases the risk of which can be reduced through physical activity, such as cardiovascular disease. The provision of these new sports and recreational facilities, and importantly in a way that will be managed to secure access to local residents, will clearly assist with the objective of seeking to improve the health and well-being of residents. The development will improve the area's sporting and recreational facilities in accordance with Local Plan Policy SP15; and will assist with improving the health and well-being of the local population and therefore complying with Local Plan SP14.As such the proposal is acceptable in this regard.

Residential

10.1.44 The approved planning permission (HGY/2011/2351) provided for 285 dwellings which were intended to generatecross-funding for the stadium. The applicant sets

out that residential development, remains an important form of cross subsidy within the current proposals. The emerging site allocation in the Tottenham AAP, makes provision for residential development amongst other land uses. The increased quantum of residential development proposed, responds to the growing need for new homes identified in the Borough by the London Plan, and through the emerging Local Plan and is welcomed. The good accessibility and proximity to the existing local facilities on Tottenham High Road, and to local schools also means that the site is considered to represent a sustainable location for new homes.. The impact of noise generating uses from the rest of the development is dealt with below in the report and the impact is considered to be acceptable subject to conditions. The provision of residential use is welcomed in this growth area, as it makes an important and valued contribution to meeting the Council's London Plan housing target.

Affordable Housing

10.1.44 The London Plan through Policy 3.11 seeks to maximise affordable housing provision across London and seeks to provide an average of 17,000 more affordable homes per year up to 2031 and requires 60% of affordable housing to be for social and affordable rent and 40% for intermediate rent or sale.

10.1.45 London Plan Policy 3.12 notes that in negotiating affordable housing on individual private housing and mixed use schemes Local Planning Authorities —should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation (‗contingent obligations'), and other scheme requirements".

10.1.46 Haringey Council's affordable housing policy is contained in Policy SP2 of the adopted strategic policies DPD (2013). This requires that the subject to viability schemes meet the 50% affordable housing borough wide target. The alterations to the Strategic Polices DPD, considered by Full Council in November, propose reducing this requirement to 40%, based upon evidence of development viability. The NPPF re-affirms the government's commitment to ensure that obligations imposed by the planning process do not threaten the deliverability of sustainable development proposals.

10.1.47 The applicant has advised the Council that the viability of the development overall, and of the residential component of the development, means that it does not result in a surplus land receipt sufficient to enable the provision of affordable housing either within the development or by way of an off-site contribution. The applicant has submitted a viability assessment, prepared on its behalf, to evidence its position. In outlining the position with regard to current site viability, the applicant indicates an expectation that sales values (and hence the viability of the residential development) will improve in the future as the regeneration of the area becomes established alongside other investments. Accordingly, the

applicant proposes that a review mechanism be introduced to capture affordable housing contributions in the event that the development realises a positive land value greater than the value that the applicant argues is required to support the funding of the Stadium building.

10.1.48 Given the complexity of the funding arrangements required to deliver football stadiums in the UK, the Council together with the GLA, has appointed KPMG to provide expert, independent advice on development viability in this case.

10.1.49 KPMG has provided a report to the Council which confirms that the proposed development on the site does not exhibit a level of commercial return on investment that would enable the development to be wholly funded by mainstream lenders and banks – or be justified by the turnover of the existing football club alone. Instead, KPMG has identified a significant funding challenge associated with the stadium that will require other elements of the development (or other funding sources) to contribute towards improving the viability of the stadium project.

10.1.50 At the present time, and based upon the assessment of development costs and residential sales values in the area, the residential development is not able to make any contribution to the delivery of the stadium. This was not the case with the earlier planning permission where viability at that time meant that a residential cross subsidy was made possible. The principle of cross subsidy from the residential development contributing to delivery of the stadium has therefore previously been accepted as part of the earlier planning permission and continues to be acceptable in this case – given the significant policy support for delivery of a new stadium on the site.

10.1.51 Given the unique characteristics of the development funding —package" required in this case – to deliver sports led regeneration that achieves the strategic objectives for the site and the area - and the current lack of viability of the residential development, officers are satisfied that the applicant has demonstrated that delivery of affordable housing cannot be achieved at the current time.

10.1.52 In such circumstances, the NPPF and SPG to the London Plan recognise that the use of contingent obligations (based upon a review of viability at a later date) may be appropriate. Considerable dialogue has taken place between the applicant and the Local Planning authority on the details of the review process. The applicant‘s consultants identify a range between 15 and 40% representing appeal inspectors‘ determination of what a suitable ratio might be. In the case of the earlier planning permission for the stadium, that ratio was 24.7% - equating to an effective residential land value subsidy to the previous stadium of £22m.

10.1.53 In the intervening period, construction costs have risen. The new proposed stadium is also more expensive to construct. Residential sales values in the

locality have not kept pace with this rate of inflation – meaning that whilst the price of new homes in North Tottenham are increasing (and are already recognised as unaffordable for a number of existing residents), the rate of increase is not sufficient to cover the rising price of construction.

10.1.54 The cost and value of the proposed residential development forming part of the application will be greater than previously. The application of the same 24.7% ratio as agreed previously therefore equates to a current day value of £59.7m. In order for the residential development to achieve an indicative land value of this scale, a very significant increase in the sales prices achieved from the proposed residential units will be required – the precise figure being dependent upon the rate of construction costs inflation. Officers have considered, in the context of this revised scheme and the range of uses, whether the same ratio should be applied.

10.1.55 The financial appraisal of the stadium development indicates that the scale of the funding gap which the residential development could contribute to is significant. Officers support the principle that the residential development plays a meaningful –enabling" role in the delivery of the funding package for the stadium. However, officers also consider that the delivery of affordable housing is a corporate priority that should be afforded some weight. The financial appraisal of the proposal highlights the need for a range of funding solutions to supplement conventional funding for the project. The scale of the funding gap is significantly greater than any surplus from the residential development can fill on its own. On that basis, officers consider that the residential development can only make a contribution to (and not be entirely responsible for) filling the gap, and therefore the delivery of the stadium.

10.1.56 Having regard to the range of enabling contributions identified by the applicant's consultants in their submission officers consider that a figure of 20% as opposed to 24.7% is appropriate and reasonable. This equates to a meaningful cross-subsidy (equivalent £48.4 million at today's price) before further increases in residential values is shared between the Council and the applicant. Whilst still presenting a significant challenge, the revised figures are considered to be reasonable and justifiable in the context of the planning policy framework and taking account of RICS and GLA guidance.

10.1.57 The phasing of the project means that the residential development is not able to be carried out until 2020 at the earliest (following demolition of the existing stadium). Given the complexity of the buildings proposed, and the scale of development it is not expected that any homes would be able to be occupied on the site until 2020. This means that the likelihood that an affordable housing contribution will be derived from the development should be viewed as uncertain. Officers consider that the appropriate trigger point for the review is at full stadium occupation or at submission of reserved matters for the residential development whichever is the latter. The use of a review mechanism therefore represents an

appropriate safeguard to ensure that in the event of significant improvements in values in the period prior to the review, the policy expectations in respect of affordable housing arising from the new residential development are not avoided.

10.1.58 The applicant has suggested that in the event that the review of viability identifies that the development will secure such values, any income over that level is shared equally between the Council and the applicant (ie 50%of that value remains with the Club and 50% is payable to the Council up to a value equivalent to 50% affordable housing)– with the Council contribution being translated into a financial payment for the delivery of affordable housing at a location nearby. Although London Plan and Local Plan policy prioritises the provision of on-site affordable housing and then provision of off-site affordable housing over an off-site contribution, it is considered that an off-site contribution is appropriate in this instance given the likely form of the proposed residential units, the level of social housing already in the area and the fact that given the high construction costs of the residential development proposed, a larger number of units could be provided elsewhere with the contribution.

Education

10.1.59 The Council works closely with the Greater London Authority (GLA) to project the number of pupils expected to need school places over the next 10 years. The Council then publishes its projections every year in the School Place Planning Report.

10.1.60 The GLA includes information from the Strategic Housing Land Availability Assessment (SHLAA) to ensure that we, as the Local Authority, are able to plan for school places for children who will be living in new housing in the borough in the future.

10.1.61 At primary school level (age 4-11) the Council plan to provide local places and to achieve this, the Council split the borough in to 5 place planning areas. The Site is located in place planning area 4. Current figures in the School Place Planning Report 2015 project that supply of Primary School places in the area will be sufficient until 2020/21.

10.1.62 Residential unit estimates that fed into the 2015 School Place Planning report took into account the 285 units currently consented for the site and not therefore the additional 300 units currently proposed.

10.1.63 The 300 units that at were not included in this year‘s report will be included in the next report which will be published in July 2016. However, these units are not anticipated to be occupied until after 2021.

10.1.64 The Council plans for secondary school places as one planning area (the entire borough) and it is projected that there is a surplus of secondary school places until 2018/19. This need would arise prior to the occupation of the residential units.

10.1.65 The proposal would generate a child yield of approximately 41 children (based on the methodology in using the Mayor's SPG 'Shaping Neighbourhoods: Play and Informal Recreation'). 25 of these are predicted to be under 5, 9 aged 5-11 and 7 aged 12 plus.

10.1.66 Therefore, the current scheme, and specifically the child yield that would be generated from the scheme would require additional school places at both primary and secondary level when the residential units are occupied post 2021. The Council is in the process of identifying sites for additional school capacity in the area through the AAP process to accommodate this proposal and other regeneration schemes.

10.1.67 Local Plan Policy SP16 expects that where a development increases the demand for community facilities and services, a contribution towards providing new facilities or improving existing facilities is sought and that efficient use of community facilities is promoted.

10.1.68 Since the implementation of the Haringey CIL Charging Schedule (November 2014), financial contributions towards infrastructure are levied as a standardised amount for the quantum of new floor space dependant on the use. This money will be divided and spent on items on the Regulation 123list including social infrastructure, such as education.

10.1.70 The proposal is therefore considered to be acceptable and in general accordance with London Plan Policy 3.16 and Local Plan Policy SP16.

Hotel (Use Class C1)

10.1.71 The Development comprises 18,820 sqm (GIA) of hotel floorspace which will include 180 hotel bedrooms and 49 serviced apartments.

10.1.72 The proposed hotel would provide employment for up to 185 people. The Environmental Statement estimates that annual spend in the locality from hotel visitors would be some £560,000.

10.1.73 London Plan Policy 4.5 'London's Visitor Infrastructure' seeks to achieve 40,000 net additional hotel rooms by 2036, of which at least 10% should be wheelchair accessible, as well as recognising the need for serviced apartments. Policy 4.5 also states that outside the Central Activities Zone, new visitor accommodation should be focused in town centres and Opportunity and Intensification Areas, where there is good public transport access to central London and international

and national transport termini. Policy 4.5 also recognises that it may be appropriate to locate visitor accommodation near to major visitor attractions of sub-regional or greater significance where there is a clear link in scale, nature and location. As a site within an Opportunity Area, with good transport facilities and immediately adjacent to a major Stadium, the proposal to include a 180 bedroom hotel and 49 serviced apartments within the development is supported.

10.1.74 Saved UDP Policy CLT4 supports the provision of new hotels provided they don't result in the loss of housing and are either located within a town centre or well served by public transport. While not in a town centre the site is considered to be well served by public transport with forthcoming station and service upgrades at White Hart lane and Tottenham Hale stations. As demonstrated in the supporting Environmental Statement, the proposed hotel will not result in any significant adverse impacts on neighbouring amenity.

10.1.75 The provision of a hotel is also supported in the proposed site allocation NT7: Tottenham Hotspur Stadium, in the emerging Tottenham AAP, which the introduction of residential, commercial, education, community, leisure and hotel uses.

10.1.76 Hotel provision is also supported in policy DM53: "Hotels and Visitor Accommodation' in the emerging Development Management Policies DPD with similar caveats to saved UDP policy CLT4.

10.1.77 The Tottenham SRF supports the creation of a "destination" in North Tottenham in order to capture additional consumer expenditure (in local businesses), and to raise the profile of the area in London and beyond.

10.1.78 The provision of a hotel on the site is also consistent with the extant planning permission (HGY/2010/1000) that confirms the acceptability in planning terms of accommodating a hotel on this site.

10.1.79 The proposals for serviced apartments is also considered to comply with the above policy however a condition limiting the period of occupation by an individual guest is included in the decision notice to prevent the serviced apartments from becoming authorised self contained dwellings without having regard to the appropriate residential standards or affordable housing policy.

10.1.80 Subject to this condition it is considered that the principle of a hotel use and associated serviced apartments accords with the relevant London Plan Policy 4.5, and Saved UDP Policies CLT4 and SSP13 and its provision is welcomed.

Flexible Business/Community Use (Use Class B1/D1)

10.1.81 The Development comprises a maximum of 4,000 sqm of flexible floorspace located within the plinth, beneath the residential towers at ground, first and second floors. At this stage, the proposed use of the floorspace is unknown and the applicant seeks flexibility for the space to be used for either, or a combination of, office (Use Class B1) and community (Use Class D1) uses. It is intended that the use will be defined at the reserved matters stage. This area has also been provisionally identified as the location for a future site-wide energy centre in the event that the proposed district-wide energy centre does not come forward. It is important to note that this does not form part of this application and would be subject to separate assessment and the obtaining of any additional consents as necessary.

10.1.82 In the event that the flexible floorspace is occupied by business floorspace, this would be supported by development plan policy. The London Plan seeks to develop and enhance capacity to support local activities (Policy 2.7). The provision of business space will help achieve the objectives of Policy 4.1, as it will ensure the availability in this part of Tottenham of flexible workspace, with suitable facilities provided elsewhere within the NDP scheme, that would be attractive to small and medium sized enterprises, including the voluntary and community sectors.

10.1.83 Haringey Local Plan Policy SP8 states the Council will secure a strong economy and support local employment and regeneration. Policy SP9 states that the Council will seek to address unemployment by increasing the employment offered in the borough. Saved UDP Policy EMP5 state that employment generating uses within and outside the Defined Employment Areas (which is the case for this part of the NDP site) will be supported provided that any trips generated by the proposal are catered for by the most sustainable and appropriate means.

10.1.84 The potential for the provision of new business floorspace as part of the Development will accord with the relevant Haringey development plan policies highlighted above. The business space provides the opportunity to increase employment opportunities in this part of Tottenham, which experiences high levels of unemployment. Furthermore, the floorspace will promote sustainable movement patterns, with limited car parking being provided in order that workers and visitors use the enhanced public transport and cycle network being delivered in the area and strengthen by this development.

10.1.85 Should the flexible space be occupied by D1 community uses, this would be in accordance with Local Plan Policy SP14, which supports the integration of community facilities and services in multi-use buildings. It also accords with Local Plan policy SP16 that supports the provision of multi-purpose community facilities. London Plan Policy 3.16 ‗Protection and Enhancement of Social infrastructure' also supports the provision of community uses.

10.1.86 Business and community use are both supported in the proposed site allocation NT5: Tottenham Hotspur Stadium in the emerging Tottenham AAP which the introduction of residential, commercial, education, community, leisure and hotel uses.

10.1.87 It is considered that the principle of flexible floorspace within the plinth building, whether used for business or community uses, or a mixture of both, accords with the relevant development plan policies and such uses are therefore acceptable and are welcomed.

Community Health Centre

10.1.88 The outline element of the application includes a new community health building, Local Plan Policies SP14: Health and Well being states that the Council will seek to improve health and well-being in Haringey. This includes :Identifying appropriate sites for new health infrastructure including those in Haringey's growth areas and supporting the provision of new or improved health facilities.

10.1.89 Paragraph 7.1.13 of the Local Plan Strategic Policy Document recognises that in the 'North East Neighbourhood' (defined in the NHS Haringey Strategic Plan 2009 – 2014 and which includes North Tottenham there is an increased requirement for health and that this part of the borough experiences high levels of health inequalities.

10.1.90 London Plan Policies 3.16 'Protection and Enhancement of Social infrastructure' and 3.17 'Health and Social Care Facilities' both support proposals that provide high quality health facilities in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Policy 3.16 also supports the provision of community uses.

10.1.91 The principle of a new community health centre accords with the relevant development plan policies and is supported. Should the health facility not come forward for this site the use of this element of the site for an alternative D1 use would also comply with policy.

Overall Mix of Uses

10.1.92 The site is not within a defined town centre but part of the site is within a local shopping centre and lies immediately to the south of a large food superstore. Angel Edmonton, designated as a District centre, lies approximately 500 metres north of the site, and Bruce Grove town centre, designated as a District centre, lies approximately 700 metres to the south of the site. The site cannot therefore be defined as edge of centre. However, it is recognised that the High Road to the

north and south of the site, as well as the west side of the High Road adjacent to the site, is lined by a mix of ground floor retail space and town centre uses such as Council Offices, Tottenham Sports Centre and a Public Library and a large food superstore is adjacent to the site.

10.1.93 The proposal includes a large area of uses that may normally be classified as town centre uses, including the 4,311 sq.m. ‗Tottenham Experience' facilities (including retail, cafe and cinema space) identified in the application as ‗Sui Generis'; up to 2,000 sq.m. of D2 leisure floorspace in the ‗Extreme Sports Centre'; and up to 4,000 sq.m. of flexible space, which may comprise B1 business space or D1 non-residential Institution floorspace.

10.1.94 In line with the National Planning Policy Guidance the sequential test does not apply as the uses are in accordance with Development Plan policy. In any case the uses, given that they are essentially ancillary to the stadium/leisure use, are not considered to have an impact on the surrounding retail areas.

10.1.95 The Tottenham Retail Impact Assessment undertaken on behalf of the Council to inform the evidence base to the Local Plan by GVA/Bilfinger (2015) suggests that the overall effect of policy changes within the emerging Area Action Plan will be to support existing established town centres. The assessment contemplates the scale of development proposals forming part of this application within the assessment methodology from which these conclusions were derived.

10.1.96 The site benefits from good transport connections, which will be improved further following upgrades and enhancements to services and station facilities at White Hart Lane and Tottenham Hale, which are due to be delivered by 2018.

10.1.97 The proposals are therefore in line with national, London Plan and local policies and are acceptable and welcomed.

10.2 REGENERATION

Overview

10.2.1 The application site falls in Northumberland Park Ward. Northumberland Park Ward is rated as the third most deprived ward in London, and one of the 2-3% most deprived wards in the Country (ranking 87th out of 7669 nationally) in the indices of multiple deprivation 2015. White Hart Lane is the second most deprived ward in the borough, ranked 124th most deprived ward in England and 5th in London. In respect of employment deprivation, Northumberland Park is the second most deprived ward in London and 190th nationally.

10.2.2 The Councils data indicates that life expectancy amongst males in the ward is the lowest in the borough (significantly lower than wards in the West). The health

watch report considered by the Cabinet in 2014 indicates that access to and the quality of primary health services in Tottenham (including Northumberland Park) requires significant improvement.

10.2.3 The applicant sets out that the proposals build upon the aspirations indicated in the —Plan for Tottenham" and the —Strategic Regeneration Framework" to create a new leisure destination in North Tottenham, focused around the stadium complex. The Environmental Statement suggests that the economic impact of the stadium and related development will bring about a significant increase in visitor numbers which translates into a increase in spending within the wider local area estimated to be £22m per year primarily in services such as hospitality and food and drink.

Development Framework for North Tottenham

10.2.4 The London Plan has identified the area as part of the Upper Lee Valley Opportunity Area. The Opportunity Area Framework, prepared with the Boroughs of Enfield,Hackney and Waltham Forest promotes the creation of 10,000 new jobs and 15,000 new homes in the area. London Plan policy 2.13 and 2.14 supports the delivery of the opportunity area objectives for the area of Northumberland Park. Meanwhile, Policy 3.19A promotes a sporting legacy for London post 2012, encouraging participation in sport and physical activity – particularly in areas with historically low levels of participation.

10.2.5 The key diagram to the adopted Strategic Polices Local Plan Document (2013) identifies the area as a place for growth and change. Although changes to the document have been agreed for publication at Regulation 19 stage the objectives and spatial (growth) strategy remain unchanged.

10.2.6 The Tottenham Area Action Plan, also agreed for publication at Regulation 19 stage, outlines a spatial strategy for North Tottenham that includes:

"In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area's reputation as a premier leisure destination within North London."

10.2.7 The AAP also highlights the role that the Tottenham Hotspur FC development scheme plays as a catalyst for wider area change through a substantially improved local centre with a balanced mix of quality homes, jobs, community

and leisure facilities and sets as a clear objective: *"To create a new leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area whilst celebrating the High Road's rich heritage."* The application site is the subject of a specific site allocation (Policy NT7).

10.2.8 The NPPF sets out the government's definition of sustainable development. This includes consideration of economic, environmental and social effects and a presumption in favour of "sustainable development." By way of the Localism Act 2011, Local Planning Authorities are now obliged to consider the economic effects of development.

10.2.9 In March 2014, following a significant consultation exercise (the results of which were summarised in the report "Tottenham Future") Haringey Council adopted a Strategic Regeneration Framework. The framework set out a new vision for the area:

By the age of twenty, a child born in Tottenham today will have a quality of life and access to the same level of opportunity that is at least equal to the best in London.

10.2.10 The Strategic Regeneration Framework (SRF) sets out "seven strategies for success:"

1. World-class education and training – including new schools, better access to apprenticeships and more Tottenham young people attending university;
2. Improved access to jobs and business opportunities attracting major investment and encouraging local business growth to boost employment;
3. A different kind of housing market – improving existing homes and building new, high-quality homes to meet demand at a range of prices and tenures;
4. A fully connected community with even better transport links – continuing to improve rail, Tube and bus links, including making the case for Crossrail 2, as well as opening up Tottenham to more walking and cycling routes;
5. A strong and healthy community – improved healthcare facilities, reduced crime and strong social networks for young people;
6. Great places – putting Tottenham's character and heritage centre-stage while creating better public spaces to meet, shop and have fun;
7. The right investment and quality development – building partnerships and securing money to achieve these priorities with a focus on high quality design.

10.2.11 The SRF included a Delivery Plan with a focus on four priorities in the short to medium term to deliver the aspirations within the SRF and reflecting the aspirations collected through the 'Tottenham's Future' engagement programme:

1. People: To deliver improved access to jobs and business opportunities; world-class education and training; and a strong and healthy community;
2. Place: Better caring for the place and delivering improved public realm in all of the local centres that comprise Tottenham;
3. North Tottenham including High Road West, a new stadium/leisure destination and a comprehensive estate regeneration and housing renewal programme; and
4. Tottenham Hale: a key area of opportunity in South Tottenham, building on the delivery of a new station and a range of mixed use development.

10.2.12 The strategy sets out a range of targets, including the delivery of up to 10,000 new high quality homes and the creation of over 5,000 new jobs and 1million sq ft of employment and commercial space by 2025.

Contribution of the Development to Regeneration

10.2.13 The Environmental Statement estimates that the construction phase of the development would create 356 construction jobs per year. Over a four year construction period this is equivalent to 890 Full Time Equivalent jobs. The existing stadium employs 125 administration staff and some 67 retail and distribution staff with an additional 570 staff on match days. The application suggests that the proposed new stadium would provide an additional 100 FTE roles at the site with another 330 additional match day staff (on top of the 570) due to the increased capacity and higher levels of catering and hospitality provided. This is a material increase in staff over the previously consented proposals.

10.2.14 In addition to the stadium roles, the ES has estimated the number of proposed roles arising from the services provided within the other components of the development. These amount to 185 FTE roles for the hotel, 125 FTE roles for the Tottenham Experience 25 FTE roles for the Extreme Sports building and between 55 and 265 FTE jobs within the community/office space in the southern podium. No figure is provided for the health building in the North East Corner of the site. Overall the proposals are considered to generate at least an estimated 490 FTE (and up to 700 FTE if the flexible floorspace is B1) jobs on non match days and around 330 addtional (900 overall) part time roles on match days. The effect of these additional employees spending money in the local community is estimated at up to £950,000 (407 employees spending £10.49 per day). The ES indicates that the catchment for such roles has a strong fit with the local labour market and concludes that this amounts to a major beneficial effect at the local level.

10.2.15 The proposed events strategy for the site would see visitor numbers for football matches increase by up to 700,000 visits per year. Assuming that some supporters spend money outside the ground (the club suggest research that indicates about 60% of visitors will do this), the estimates of additional spending

in the area (using £2 - £10) equating to between £0.8m – £4.2m per year spent locally. If a more optimistic estimate of local spend is made, this figure has scope to increase further (using Brentford FC application metric of £17 per day), the ES estimates this being up to £7.5m pa.

10.2.16 The club has, separate to this application, recently commissioned the accountants Deloitte to assess the wider impacts of spending in the locality of the existing ground – and to forecast additional economic benefit that might arise from the development.

10.2.17 For non football matches, including NFL and Concerts, the Deloitte report suggests an additional 10 major (60,000 seat) events generating some £14.4m from 600,000 additional visitors whilst the 6 concert events (with a theoretical capacity of 55,000) would add a further 330,000 visitors and £0.7m – £8m in the wider impact area (defined as Haringey, Enfield and Waltham Forest).

10.2.18 The conferencing and banqueting capabilities within the stadium are estimated to provide a capacity for up to 81,180 delegate days which could be provided within the stadium that in turn would generate up to 24,540 overnight stays at the hotel. The ES provides some optimistic forecasts for the rooftop walk, but overall estimates of the combined rooftop and Tottenham Experience visits are between 45,000 and 96,000 per year. This, they suggest would generate a further local spend of up to £2.4m. The stadium tours currently generate some 18,500 visits per year to the stadium.

10.2.19 The hotel and extreme sports centre are, together expected to generate an additional 153,000 visits (53,000 for the hotel) and between £200,000 and £2.4m of spend locally.

10.2.20 Whilst the viability assessments and anticipated sales values required (translating into purchase prices) mean that the contribution of the residential development to meeting local housing need is likely to be modest (a point made by those commenting on the application), the occupation of the residential development is considered likely to give rise to an increase in local spend by residents.

10.2.21 Representations received, following consultation on the planning application, have referred the Council to the 2015 report of the London Assembly —the Regeneration Game" into stadium led regeneration. The report acknowledges that although the hard evidence for a positive economic impact is still lacking, the arrival of a well-known club, or the expansion of an existing stadium, can change people's views of the area, increasing local pride and encouraging newcomers to set up homes and businesses. The report recognises that *"Football clubs have a responsibility to ensure that the local community gains from a new stadium. Communities must benefit from new mixed tenure housing, and improved*

transport links and connections across the area. Local authorities must also capitalise on opportunities to guarantee that clubs and other incoming businesses prioritise the local workforce when sourcing new employees." It should also be noted that in this case there is an existing stadium on the site.

10.2.22 Alongside the profound physical changes to the appearance of the area arising from the scale and form of the development proposed, the applicant has highlighted how the application provides for the restoration of heritage buildings comprised within the Northern terrace (as part of the mitigation for the loss of previous heritage buildings associated with the earlier planning permission).

10.2.23 The applicant is in parallel to the application, finalising proposals to extend the reach of the Tottenham Foundation activities through two new potential programmes; the –Tottenham Together" program and the —Percy House Future Skills Hub." Over the last year, the applicant sets out that the Tottenham Foundation has spent £2.9 million on programmes that have engaged some 10,000 individuals on 50 programmes including employment, training and apprentice programmes, physical health and wellbeing and community safety. This, the charity calculate, achieves a social cost saving (defined as the costs avoided as a result of the interventions made) equivalent to £20.5m in the local community.

10.2.24 The Tottenham Together programme would focus on using the podium area, and spaces within and beyond the site, to build upon existing projects that deliver a range of social cohesion and health & wellbeing outcomes. This could include using the podium to provide activities, including a wide variety of sports sessions that in turn signpost individuals on to positive employment, educational and personal development pathways. The programmes help build safer, stronger, more respectful communities through the development of young peoples' potential, getting to youngsters who had previously proven harder to reach and guiding them towards a range of healthy and constructive activities. The project also provides an opportunity to build upon existing work within communities to improve the opportunities to access health promoting programmes using the podium to deliver a diverse and inclusive programme of activities that are based around the factors known to influence the health of individuals, including background, lifestyle, economic and social conditions.

10.2.25 The Percy House Future Skills Hub would be focused around the potential re-location of the Foundation to Percy House (located in the grade II* building that forms part of the north western terrace) the programme will have an Employment and Skills Focus. The Future Skills Hub is proposed to be a community enterprise, employment and skills based centre located at the heart of the regeneration of North Tottenham and delivered by The Foundation. The hub will create job, traineeship and apprenticeship opportunities, teach skills linked to the development itself, e.g. heritage skills, and up skill local people to access the

job market. The long term, and in some cases (for example Heritage) specialist, components of the construction and operation of the site provide opportunities for career pathways to be developed for those on the scheme to impact positively on some of the most disadvantaged sections of our local community including those with a disabilities. These programmes are not proposed to be specifically secured through the S106 agreement however the application is conditioned such that a local employment strategy needs to be submitted and approved by the Council which will cover both construction and post construction employment opportunities.

10.2.26 The emerging public sector Health and Wellbeing strategy 2015-18 emphasises the importance of increasing healthy life expectancy particularly in the East of the borough. In addition, the Health in All policy calls for building healthy environments to promote and enable healthy living choices (through sport and recreation) and creating an environment that supports healthy living.

10.2.27 Haringey Council's Corporate Plan provides overarching objectives focusing on preventing ill health, promoting safe and sustainable communities and promoting growth and regeneration through housing and economic development activities. The Tottenham Programme, expressed in the Strategic Regeneration Framework, is one of 5 transformation projects.

10.2.28 The regeneration benefits of the proposals clearly align with, and reflect, aspirations and site specific requirements which, notwithstanding the report of the London Assembly on the Regeneration Benefits of Football stadia, reflect local aspirations derived through the Tottenham Futures consultation and which are set out in the adopted, emerging and non statutory plans and strategies covering the area – including the Council corporate plan. These documents consistently reflect the importance attached to securing additional employment, expenditure and community infrastructure within the locality – both to facilitate programmes and activities provided by the Council and other services, and to support and underpin local business viability and opportunities.

10.2.29 Whilst therefore the submitted viability assessments demonstrate that the proposals are unlikely to significantly impact upon affordable housing need within the existing ward given the limited scope for the development to contribute to affordable housing delivery off site, the scale of development will nevertheless provide a significant number of new homes that will help to meet London's wider housing needs in the future. In addition,the scale, duration and content of the development, subject to the measures to be secured through a s106 agreement to maximise local employment and procurement, and support construction and service based training programmes, will present opportunities for a significant and direct improvement in the economic wellbeing of the area. Other elements of the development, notably the health and community uses, provide infrastructure that will enable the Council and its partners to positively impact upon the health

and wellbeing of North Tottenham. The application has also highlighted how the new facilities and on site amenities will enable further expansion of the work of the Tottenham Foundation through a range of health and community safety programmes that they deliver with partners.

10.2.30 Whilst is it impossible to precisely quantify the regenerative impacts (both in financial and non financial terms) of a development of this magnitude it is estimated that 890 construction jobs, between 820-1030 additional jobs post construction and at least £19.45 million contribution to the local economy per year. The configuration and mix of uses and resultant employment opportunities (partly associated with some 2 million plus additional visitors to the area) is, together with the scale and duration of the investment, considered likely to result in significant, transformative economic, social and physical change in the locality.

10.3 DESIGN AND VISUAL IMPACT

10.3.1 The response of the proposals to the site context, and the further studies undertaken since the previous grant of permission for the stadium have translated into a new masterplan for the site incorporating both new uses and buildings (and public spaces) and significant changes to the football stadium itself. The assessment of the visual and townscape impacts of the developments as a whole concludes that the design proposed is acceptable on wider views and townscape and officers agree with this conclusion. The detailed design considerations relating to individual elements within the application is considered further below.

10.3.2 The planning application is accompanied by a Design and Access statement which explains the design evolution process that has been followed to create the new master plan for the site. The statement sets out the design team approach to the site context and the design rationale and explains how the design responds to the opportunities and challenges present. The design and access statement, together with the Environmental Statement, assesses the impacts of the chosen design on the local and wider landscape, the historic environment, ecology, local micro-climate conditions and on surrounding properties.

10.3.4 The Design and Access statement seeks to explain how the significant scale, and anticipated impacts, of the masterplan will complement the characteristics of the existing area whilst at the same time, engaging with the wider aspirations for the North Tottenham area.

10.3.5 The Design and Access statement and Environmental Statement also set out the crowd safety rationale that inform the application proposals for the demolition of the three locally listed buildings on the High Road, and contain an options assessment (within the ES) that provides a comprehensive assessment of

alternatives to demolition to satisfy the requests of Historic England and the Council.

Design Policy

10.3.6 The Council insists on high quality design. In accordance with government guidance in paragraph 64 of the NPPF, the Council will not accept design that is considered inappropriate to its context, or which fails to take opportunities to improve the character and quality of an area and the way it functions. SP11 and SP12 set out the Council's approach to ensuring that design in the borough is of the highest possible quality as well as being sustainable and conserving the borough's heritage. SP11 sets out the Council's general policy on design, which is that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. The impact of the scheme on heritage is dealt with later in this report.

10.3.7 Policy AAP 6: Urban Design and Character including Tall Buildings' of the emerging Tottenham Area Action Plan deals with the issue of tall buildings and urban character. It establishes the principle that building heights need to respond to the existing street hierarchy. It asserts that buildings should be taller on main streets and within town centres and decrease gradually as you move away. This is considered a key component in creating legible neighbourhoods and places which is a key objective of the Tottenham AAP. This approach is also in line with Policy DM6 of the draft Development Management DPD.

10.3.8 AAP 6 states that taller buildings will be appropriate along (parts of) Tottenham High Road. The appropriate height of development sites within Tottenham will be guided by the principles in Local Plan Policy DM1, and DM6, the reorientation of Tottenham Hale from an urban to a central area, the policy below, and the Site Allocations included in the Neighbourhood Areas Chapter.

10.3.9 DM1 of the emerging development management polices DPD contains the Haringey Development Charter. This seeks to ensure that new development meets a number of requirements:

- All development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:

  a. Relate positively to neighbouring structures, new or old, to create a harmonious whole;
  b. Make a positive contribution to a place, improving the character and quality of an area;
  c. Confidently addresses feedback from local consultation;

d. Demonstrate how the quality of the development will be secured when it is built; and

e. Are inclusive and incorporate sustainable design and construction principles.

10.3.10 The policy is accompanied by a suite of design standards covering the character of the development, privacy and amenity considerations and landscaping. DM2 seeks to ensure new developments are safe and accessible and promote wider use by everyone. DM3 provide a policy framework for the delivery of public art within the public realm and for the creation of accessible and well managed private open space within development. DM6 ‗Building Heights' expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms. It states that tall buildings will only be acceptable in areas identified on Map 2.2. The Map identifies the North Tottenham Growth Area as one of the three areas in Haringey (along with Wood Green and Tottenham Hale) as being suitable for tall buildings. In addition DM6 states that tall buildings should also act as landmarks, identifying locations of civic importance, major public transport interchanges, and areas of high visitation. They should also be elegant and well proportioned, and visually interesting when viewed from any distance or direction; and positively engages with the street environment.

10.3.11 Good design is also central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which address both general design principles and specific design Issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design polices in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

Townscape and Visual impact assessment

10.3.12 The proposals include buildings of considerable scale and height. The revised siting and size of the stadium and the hotel, extreme sports and residential elements of the proposals will be visible in both local and more distant views of the area from a range of viewpoints. The Environmental Statement accordingly includes a landscape and visual impact assessment which explains:

- the loss or damage to natural and built features and the perceived change to the character of the townscape resulting from the Project
- the capacity of the townscape to accommodate the type of Project;
- the extent to which the Project would be visible; and

- where visible, assessing how the view would change in relation to a range of visual receptors.

10.3.13 The assessment follows the approach recommended in the Guidelines for Landscape and Visual Impact Assessment by The Landscape Institute and Institute of Environmental Management and Assessment and broadly follows the same methodology employed for the first planning applications in 2010 and covers both construction and post completion phases.

10.3.14 The townscape assessment comprises a description of the underlying topography and broad characteristics of the built environment and the impact that the Project would have on this character. It assesses the effect on the various components, which contribute to the overall urban environment such as buildings, townscape and visual characteristics, within a defined local urban area surrounding the site up to 1km from the Project Site. The assessment also has regard to the cumulative effects of the development with other developments. The existing permitted development for the stadium forms part of the baseline conditions for the assessment.

10.3.15 The physical boundary for the townscape study was established by walking and driving throughout the locality and establishing appropriate edges. Officers have considered and agree with the appropriate extents of the study area as follows:

- To the north: Up to Bridport Road, Shaftesbury Road and Brantwood Road;
- To the south: 200m south of Junction of Bruce Grove with High Road;
- To the west: Bruce Castle Park and Tottenham Cemetery; and
- To the east: Watermead Way.

10.3.16 The methodology for the townscape assessment has been drawn from some of the terminology and guidance found within two further documents:

- CABE By Design (May 2000); and
- Guidance on the Methodology for Multi-Modal Studies (GOMMMS).

10.3.17 The visual assessment undertaken for the 2010 application identified 30 viewpoints. The assessment for the current application uses the same viewpoint locations, to assist with the comparison of the consented scheme and the current Project. The assessment also includes 7 additional viewpoints prepared as part of the heritage assessment of the proposals. Assessment of the predicted views was assisted by the use of 3D modelling, wireframes, photomontages, and elevations of the proposals. This has led to the production of a series of wireline Accurate Visual Representations (AVRs) and photorealistic AVRs which are incorporated into the ES. Very long distance viewpoints have also been assessed from key areas of open space, including Alexandra Palace (Viewpoint 1), Parliament Hill (Viewpoint 2), Greenwich Park (Viewpoint 3), and Finsbury Park (Viewpoint 30). Only from Alexandra Palace can the existing stadium be viewed

as an element within the view, and this as a barely discernible feature in a much wider panoramic view.

10.3.18 The Council has adopted Supplementary Planning Guidance (SPG) 1c Strategic Views. The SPG provides detail on the protection required for the strategic views between St Paul's Cathedral and Alexandra Palace. It identifies four zones of the strategic view for protection: the Viewing corridor; the wider setting; the mid-ground; and the foreground. The application site falls outside all four of these zones.

10.3.19 The ES assessed a number of townscape and visual effects including from Bruce Castle Mixed Open Space and from Tottenham Cemetery and Bruce Castle Park. The most noticeable long distance view to be affected would be from Alexandra Palace. The ES therefore concludes that —Overall on balance the Project would create a notable enhancement to the townscape character and views by providing a well-defined and formed built character and public realm, through high quality architecture and materials. The Project would create a unity and coherence of built character, whilst also providing visual diversity. The changes are seen as an important element in the proposed vision for the wider townscape regeneration of the locality."

10.3.20 The development will increase the visibility of the site in more distant views and the site will become a more visible/obvious components of views from a number of local viewpoints. The conclusions of the applicant's assessment on views is accepted by officers. The project will result in profound change to the appearance of the site in surrounding streets, which when considered in the round is positive. The physical impacts of that on amenity are considered separately (as are the impacts upon microclimate). The proposals reflect the scale and extent of ambition for the area contained within the adopted and emerging policy for the area and the potential impact is recognised and reflected in the quality of the proposed architecture, in accordance with adopted and emergent design policy requirements.

Crowd Safety

10.3.21 The Club has identified what it believes to be a fundamental crowd safety problem with the current 36,000 capacity stadium and with the existing planning permission for a 56,250 capacity replacement stadium. This is caused by the narrow stretch of footway in front of the three locally listed buildings, the former White Hart Public House (750 High Road), the Edmonton Dispensary (746 High Road) the Red House (748 High Road) which at its narrowest creates a 1.9m pinch point. This results in the pavement in front of these buildings not being able to safely accommodate the large crowd flows along this part of the High Road on match days resulting in people spilling out on to the road and bus lane.

10.3.22 In the consented scheme these three locally listed buildings are retained. The design approach at that time was to create a pedestrian route around the back of the three locally listed buildings and the Grade II Listed Warmington House that was intended to take most of the spectator flow off the High Road. However when the new Stadium design team came to review the scheme crowd flow analysis, using more sophisticated software than was available at the time of the previous application and CCTV footage, it revealed that the natural desire lines and high pedestrian flows on match days would mean significant number of spectators would continue to use the narrow pavement in front of the listed buildings and move out into the highway. It is understood that this puts in doubt the ability of the club to obtain a safety licence for the consented stadium.

10.3.23 The applicant (through expert consultants) has undertaken a study of various options to address this issue without having to demolish the three locally listed buildings. These options range from intensive stewarding, temporary closure of part or all the High Road, permanently narrowing the High Road to extreme measures such as building elevated footways. All alternative options were dismissed for reasons relating to the impact of road closures on traffic; because they were actually more harmful in heritage terms; or because they simply did not produce the required improvements to crowd safety.

10.3.24 The Council has commissioned its own independent review of the various alternative options. The review fully supports the conclusions of the Club's own consultants. The Clubs crowd safety option is attached in Appendix [xx] of this report as is the Council's independent review.

10.3.25 The conclusion of officers is that a genuine crowd safety problem exists and that this is a highly material consideration in assessing the scheme. The only other potential option that is presented in the options appraisal is to close the High Road for fairly prolonged periods. This would be highly disruptive for the operation of buses across North London for prolonged periods and this is not considered to be feasible and as such has been discounted. Provision of a safe environment is supported in Local Plan Policy SP11 'Design', Saved UDP Policy UD3 'General Principles' and emerging Development Management Policies DM2 'Accessible and Safe Environments'. London Plan Policy 7.2 'An Inclusive Environment'. As such the current design is supported by Officers.

Quality Review Panel

10.3.26 Haringey's recently established quality review panel has considered the development proposals on two separate occasions [once for a pre-application in July 2015 and once following submission in October]). The panel's comments are reproduced in full in the appendices; extracts from the panels review in October are nevertheless also reproduced below:

The panel is supportive of the design of the stadium building, and welcomes the improvements that have been made since the last review, concerning the fluidity and visual coherence of the different facades.

"The panel welcomes the level of detail in the design of the public realm, however they feel that the design of the podium-level public space requires further refinement in order to deliver comfortable, welcoming places. The panel have concerns about the visibility and viability of the public space as a destination.

The panel recognise the long-standing need for a community health building, and supports the scale of the proposal for the building, but feels that access and layout issues require further consideration.

The panel supports the use of cast iron in the façade of the Tottenham Experience, but feels that its success will depend on the quality of the detailing and the articulation of visual rhythms that reflect the proportions of Warmington House.

The panel broadly supports the design of the hotel, and feels that the elevational treatments are exciting. Further consideration of the public realm at the entrance would be welcomed, as would the introduction of a canopy to reduce negative wind effects from the tower above.

The panel accepts the broad scale and indication of quality of the extreme sports building, but has concerns over the viability of the use, and would like to see more detail concerning the proposals.

Whilst the panel broadly supports the scale and level of detail of the residential section of the development, they strongly advise the Council not to accept an outline planning application for the residential tall building on such an important and prominent site. There is a risk that the scheme may be „dumbed down" in design quality once the principle of development has been established.

Stadium

10.3.27 Although an extremely large building in its own right and in relation to much of its surrounding context, the new proposals have to be seen in the context of the existing consented scheme which set the principle for a building of this size at this location. A replacement stadium is also supported by Site Allocation TH7 in the emerging Tottenham AAP.

10.3.28 The new proposal is considered by officers to be a bolder and more interesting building than the existing consent. The sculpted appearance of the structure and its interaction with the high road and Worcester Avenue through new bold glazed elements and the way in which the building engages with the street (especially

the High road) are considered to be significant enhancements over the consented development. The building is larger than the consented scheme but treatment of eaves and edges within the asymmetric shape mean that the scale and impact of the building in views from near perspectives will be substantially similar. The proposed cladding of the Stadium is primarily a light coloured metallic mesh wrap which gives the stadium a sculptured appearance and will be more subtle than the previous panels proposed.

10.3.29 The design of the stadium is also driven by a desire to provide one the country's finest visitor experiences. This reflects the aspiration and ambition of the Football Club (shared by the Council through its strategies including emerging local plan) to create a premium sporting and visitor destination in London. The internal configuration of the stadium, for both fans/visitors and sport is considered to reflect this aspiration and will provide a quality of experience consistent with the finest sporting venues in the Country. The ambition – reflected in the design – to use the stadium throughout the week and year is reflected in the provision of elements of open glazing – providing views into the internal workings of the building and making for a much more visually interesting and engaging building within the high street during the daytime and evening.

10.3.30 Officers therefore consider that the proposed stadium design is of high quality with the potential to become an iconic structure within the area and more widely. The Quality Review Panel has observed that the proposals have design merit. In recognising its potential contribution to the area, they have nevertheless made a number of detailed comments on the specific components of the development. And have questioned the proposed external ~~-~~elevator box" located on the High Road elevation. Conversely, the GLA in its Stage 1 report sets out that the projecting glazed escalator box on the western elevation has the potential to enliven the facade. The purpose of the glazed escalator box is to provide an opportunity for activities within the building to enliven the High Road. It is an obvious and deliberate component of the design that helps to mark the entrance to the building and engage with the linear form of the High Road. The differing views of the GLA and QRP are noted but officers are satisfied that the quality of the stadium building and the impact that this element of the design has on the street and the character and appearance of the conservation area is acceptable.

Tottenham Experience

10.3.31 As discussed above, the scheme proposes to demolish the three locally listed buildings; retaining the grade II listed Warmington House and incorporating it into what is described as a new terrace of a similar height to Warmington. While it may have an appearance of a three storey terrace when viewed from the High Road ~~t~~he Tottenham Experience' is part of larger building conjoined with the southern podium and plinth.

10.3.32 The terrace is either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this ‗two storey' structure would be the same height as the listed building itself. To the rear, is an atrium connecting the rear of the building to the southern podium ‗public square'. The works would restore the listed building, including repair works on all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum.

10.3.33 Notwithstanding concerns discussed in the Heritage section of the report over the loss of the three locally listed buildings, officers consider the proposed Tottenham Experience to be a bold and attractive building. The relationship with Warmington House has prompted differing views. The QRP considered that if demolition of the locally listed buildings were justified, the proposed design of the Tottenham Experience building was acceptable – subject to the applicant addressing the linearity of the ground floor elevations. The glazed link between Warmington House and the new, contemporary face of the Tottenham Experience (and the separation of these elements) is considered appropriate by planning officers– notwithstanding the differing view of the Conservation officer. The deliberate contemporary form and materials for the elevations to the building will form the backdrop to a busy public space (on match days especially) and represents, an appropriate and high quality response that also helps to mediate the change in scale to the rear – between the High Road and the stadium and podium buildings beyond.

10.3.34 The proposals provide an active and interesting building frontage to the High Road and will amount to a high quality, contemporary built form that is considered to be an appropriate and acceptable response to the context and design challenges associated with the site.

Hotel

10.3.35 The GLA in its Stage 1 report were concerned that the design of the hotel as a *„glass-clad curtain walled building"* would appear out of context with the High Road Conservation Area, but that it did help to visually distinguish the building and its use and that it related well to the new Stadium. They were also of the view that the hotels ‗blade' shape provides *„an interesting visual contrast to the rounded massing of the lower-rise Stadium".*

10.3.36 While it could be considered out of context with existing buildings in the High Road, officers consider the hotel to be an elegant, well proportioned, and visually interesting structure that meets the requirements of DM6 in that it acts as a landmark, identifying a location of civic importance and an area of high visitation. The main entrance to the Hotel is at street level on the ‗Plaza' to be created at the junction of the High Road and Park Lane and is this considered to engage

positively with the street environment. Its design also complements that of the stadium.

Southern Residential and Extreme Sports

10.3.37 The residential component of the proposal is submitted in outline with full details of layout, scale and access submitted ; and matters relating to appearance and landscape reserved for approval at a later stage. The application is submitted with a Design Code and Parameters relating to the residential and Extreme Sports components, which establish a series of design parameters that any subsequent reserved matters application will need to, comply with. This includes a commitment to a maximum of eight units per core, no single aspect north facing units, and minimum floor to ceiling heights of 2.5 metres, with 2.6 metres preferable at lower levels and a commitment that allunits will meet the London Plan space standards. This ensures compliance with Local Plan Policy SP2, London Plan Policy 3.5 and the Mayor‘s Housing Supplementary Planning Guidance (SPG), November 2012.

10.3.38 The introduction of maisonette ‗town houses‘ on Park Lane, with defensible space in the form of small front gardens is welcomed, as it will help to relate the larger scale of the proposed residential towers with the adjacent low rise housing. It Is accepted that the introduction of two residential towers of up to nineteen above-ground storeys on Park Lane presents a contrast in scale to the two storey housing to the south; however this is considered to be an improvement on the present situation, where the south stand of the existing Stadium extends out above the highway at upper levels and presents a continuous line of blank frontage to the street. The proposals will considerably widen the footway, introduce tree planting, and open up views between the residential towers. The taller residential buildings are appropriately located further north, closer to the Stadium, with lesser impact on the surrounding context. The Design Code and Parameters are considered to be rigorous enough to ensure a high residential quality and are welcomed. Compliance with these is conditioned.

10.3.39 The Design Code and Parameters also secure the maximum height of each of the residential and Extreme Sports buildings.

10.3.40 The communal amenity space provided on top of the residential plinth is submitted in outline form, as it will need to respond to the final design of each of the residential blocks. The Design Code and Parameters establish appropriate design principles to inform the future consideration of this space.

Public Realm

10.3.41 The intention to introduce new public routes across this large and currently impermeable site is strongly supported. This will be implemented through the podium level routes passing from the High Road to Worcester Avenue and Park Lane, both to the north and south of the proposed Stadium. The route to the south passes through the new ‗South Podium Square', forming a ‗green way route' linking Northumberland Park Station to White Hart Lane Station. These routes are lined almost exclusively with uses associated with the Stadium, chiefly access and circulation space. The South Podium Square has some adjacent cafe and restaurant space located in the hotel and Extreme Sports building; and flexible uses with the overlooking residential towers above, although this element is part of the outline application and expected to be constructed later. The relatively limited surrounding and overlooking uses, together with access to these routes via stairs/lifts raises some concerns about the level of active use and overlooking of these routes and spaces outside of match and event times, although it is noted that when the residential units are occupied overlooking will be extensive. The applicant has stated its intention for this space to be used by the Tottenham Foundation, community organisations and the Council for a variety of events. The way this area is utilised and managed will be essential to its effectiveness as a public open space. A management strategy for this space will be secured by the s106. A condition requiring the implementation of a CCTV strategy for public areas to be agreed with the Council is also included on the decision notice..

10.3.42 The ‗South Podium Square' is equivalent in size to Trafalgar Square and includes a series of ‗islands' around the ventilation shafts to the car parking areas, which provide seating, trees and planting; a ‗jumping jet' water fountain; a multi-use games area and seating areas for the surrounding café and restaurant uses. The north, east and west sides of the Square allow spectator access to the Stadium. The proposals to include multiple uses and fountains, to enliven this large space, are supported. The designs indicate that the public realm will be of a high quality.

10.3.43 A new ground level ‗Plaza' is proposed on the south-west corner of the site, at the junction of the High Road and Park Lane, providing a new gateway to the Stadium. The form of the ‗Tottenham Experience' building appropriately delineates the space, also aligning with the High Road, while allowing large event day crowds to pass towards the Stadium. One of the entrances from the High Road to the basement car park and servicing area is through the Tottenham Experience building at ground level. This has the potential to create conflict between pedestrians and vehicles when accessing the stadium. The event day management plan will need to restrict vehicle access before and after an event to avoid a potential conflict.

10.3.44 The stretch of Worcester Avenue adjacent to the existing stadium and the cleared northern part of the development site is currently very poor quality. Along

its western side it is lined by the largely blank and mostly inactive facade of the existing East Stand and the hoarding around the northern part of the development. The east side of this road is mostly block wall and high security fencing along the perimeter of Northumberland Park Community School. The proposals seek to activate the southern end of Worcester Avenue, with accesses to one of the residential towers and the proposed flexible use in the podium. This element of the scheme is secured within the Design Parameters for the residential part of the outline application. The northern part of the scheme's frontage to Worcester Avenue is activated with entrances to the stadium corporate hospitality, stadium management offices, and the Community Health building. The eastern facade of the proposed stadium will also present a far more articulated and attractive frontage Worcester Avenue with a large glazed opening allowing views into the stadium interior. The proposals to make Worcester Avenue a shared space, with pedestrian zones delineated from vehicular/servicing routes through the positioning of trees and street furniture are strongly supported by officers.

Accessibility

10.3.45 Local Plan Policy SP11 _Design', Saved UDP Policy UD3 _General Principles' and emerging Development Management Policies DM2 _Accessible and Safe Environments' all support and encourage accessible and inclusive design. London Plan Policy 7.2 _An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion.

10.3.46 The applicants' access statement includes a full assessment of the approach to inclusive access for each element of the full and outline application. A full analysis is provided for the housing standards contained in the draft Interim Housing SPG, which demonstrates that the residential element will meet all of the relevant standards. An analysis of Lifetime Homes standards is also included, which demonstrates compliance, other than those to be addressed during detailed design. Access standards are secured in the Parameter Plans. The application is conditioned such that 90% of new housing will meet Building Regulations requirement M4 (2) _accessible and adaptable dwellings and that 10% of new housing meets Building Regulation requirement M4(3)'Wheelchair user dwellings'ie designed to be wheelchair accessible or easily adaptable in line with the draft Minor Alterations to the London Plan.

10.3.47 The podium level public spaces are accessed by stairways and various points around the podium perimeter. The larger southern podium has 6 groups of stairs providing links to the High Road, Park Lane and Worcester Avenue. In addition lifts, which the applicant has confirmed will be operational 24 hours a day/7 days

a week, are provide at 4 locations. The GLA has suggested that an additional lift be provided as part of the wide flight of stairs leading up to podium in the southwest corner between the Tottenham Experience and the Hotel. The club has responded that this stair, the base of which is in the proposed ‗plaza' at the junction of Park Lane with the High Road is on the main desire line for people travelling towards the stadium from the south. As such this stair is likely to experience the highest pedestrian flows and therefore needs to be as wide as possible. The nearest lift to this stair case is between the Hotel and Extreme Sports building approximately 40 metres away from the corner of Park Lane and the High Road for anyone approaching from this direction in need of lift access. Officers consider the proposed arrangements to be an appropriate balance between ensuring efficient pedestrian flows and inclusive access.

Interim arrangements for Podium

10.3.48 As not all the podium will be provided until the later outline elements of the scheme come forward, an interim arrangement is detailed in the submitted ‗Landscape Temporary Surfacing Plan. This sets out a smaller southern podium area required to provide safe access to the stadium. It has a basic block paving surface and is accessed from street level by temporary stairs from Park Lane, the permanent stair and lift in this location will be installed when the southern podium is completed with the latter phases of the development. All other stairs and lifts to the podium will be installed prior to the stadium opening and their delivery is conditioned.

Outline Applications

10.3.49 The QRP were of the view that the residential towers and extreme sports buildings because of their size and proximity to the Conservation Area should be submitted in full. The panel noted that tall buildings succeed or fail on the quality of their detailed design. The panel felt that there is a risk of the design and construction quality being ‗dumbed down' through value engineering at reserved matters stage.

10.3.50 Although CABE/EH Guidance on Tall Buildings (2007) calls for tall buildings to be submitted in full application form, Officer's agree with the view expressed in the GLA Stage 1 report that the Design Code and Parameters are sufficiently rigorous to ensure a high quality development. Officers would add that it is within the Council's control to ensure that the standards set out in the outline application are maintained at the reserved matters stage. Under the Council's scheme of delegation reserved matters for major applications are dealt with by committee. To further ensure that design quality is maintained the GLA also strongly encourage the retention of the residential scheme architect and this or a suitable alternative to be agreed with the Council is conditioned

Child playspace

10.3.51 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor‘s Play and Recreation SPG sets a benchmark of 10 sq.m of useable child playspace to be provided per child, with under 5 child play space provided on-site as a minimum. Using the methodology in the Mayor‘s SPG it is estimated that the child yield will be 41. The Design code submitted in support of the outline planning application identified that the provision of playspace will be in line with the SPG, which is acceptable given that the Design Code is an approved document and compliance with the design code is conditioned.

Density

10.3.52 London Plan policy 3.4- Optimising Housing Potential states that taking into account local context and character development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 45-260 units) per hectare on a site such as this where the PTAL is 4. The policy does set out however that the ranges are guidelines and should not be applied mechanistically. The density using the whole area of the site is approximately 128 units per hectare however when taking the residential site in isolation (0.5 hectare) the density is considerably higher and is 1,170 units per hectare (3,010 habitable rooms per hectare) . Given that the high quality of living environment is secured by the Design code, and taking account of the open space surrounding the residential site, this is acceptable in this instance in this growth and Opportunity Area.

Design conclusion

10.3.53 The visual and townscape assessments accompanying the application demonstrate that the scale of development proposed within the application will have a significant impact on the appearance of the area locally, and will render the stadium site more visible in distant views and from raised vantage points. The Design and Access statement indicates how the proposals have evolved from the earlier consented scheme, and have changed in response to a range of design considerations, including the effects of crowd safety modelling. The requirement in the emerging and existing planning policy framework is for such developments to embody a quality of design consistent with their scale, and the ambitions for the area.

10.3.54 The site itself with the existing stadium and its large plot, the Love Lane Estate, the recent Brook House development and the older residential tower on Fore Street are all large buildings. The existing consent has already set the principle of a replacement stadium similar to the scale proposed. While the additional

development on the south of the new stadium is of a scale that exceeds what was previously approved in terms of scale and height, the cluster of tall buildings adjacent to the significant bulk of the stadium building is considered to be acceptable and consistent with emerging planning policy which supports new development including tall buildings in this part of Tottenham.

10.3.55 The quality of the design has been considered by officers in addition to the QRP and GLA. This has highlighted differences in view on specific elements of the scheme. Conditions are considered appropriate to engage with the concerns expressed by both bodies around the design of the proposals. The implications of the crowd modelling (and changes to the site layout) have prompted considerable comment because of the implications on the locally listed buildings and consequential effects on heritage interests in the area. The conclusions of the crowd modelling and associated design changes have been reviewed by the Local Planning Authority and found to be sound. The QRP have expressed the view, consistent with that of officers that if the loss of the buildings is justified, the design response of the proposed replacement building is, subject to minor changes that might be achieved by condition, appropriate. The scheme also provides safe and accessible buildings and open spaces.

10.3.56 The proposals overall amount to a dramatic and significant intervention into an established area embodying mixed architectural styles and varying building scale. The physical impacts of the development on surrounding buildings and users are considered separately. The proposals have prompted a range of comments and have been the subject of design review. On the basis of the Local Planning Authorities assessment of the design merits, and notwithstanding the impact of the proposal on existing heritage assets and the North Tottenham Conservation Area (which is dealt with in the Heritage section of this report) the scheme is considered to demonstrate high quality design as required by existing and emerging development plan policies and is therefore acceptable.

10.4. HERITAGE

Background:

10.4.1 Tottenham Hotspur Football ground partly falls within the North Tottenham Conservation Area. North Tottenham is the second oldest Conservation Area in Haringey, the core around the junctions of White Hart Lane and Northumberland Park with the High Road being originally designated on 28 March 1972.

10.4.2 The second, separate, southern section of the High Road between Brereton Road and Lordship Lane was designated on 26 March 1978. The small central section from Brereton Road to Whitehall Street that joined the two was subsequently designated on 16 September 1991. Chapel Place, to the north west of the junction between the High Road and White Hart Lane was included in a

further extension on 14 March 1995. The current conservation area boundary was further amended on 13 July 1998 to include the section of the High Road between the northern borough boundary and Brantwood Road together with several other minor additions and deletions.

10.4.3 The North Tottenham Conservation Area is part of the Tottenham High Road Historic Corridor of six connected Conservation Areas and that includes Scotland Green and Bruce Grove Conservation Area to the south.

10.4.4 An appraisal of the North Tottenham Conservation Area was undertaken as part of a wider appraisal of the entire Tottenham High Road Historic Corridor and adopted on the 9th March 2009. A more recent appraisal has been undertaken of the Tottenham High Road Townscape Heritage Initiative (THI) which is a sub area, of the North Tottenham Conservation Area which was adopted on the 19th December 2014).

10.4.5 The conservation area contains a number of locally listed and statutorily listed buildings This section of the High Road is characterised by predominantly three-storey brick-built Victorian, Edwardian and some Georgian buildings) that front directly onto the High Road.

10.4.6 NPPF chapter 12 ‗Conserving and enhancing the historic environment' and London Plan policy 7.8 ‗Heritage Assets and Archaeology' states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Similarly Local Plan Policy (2013) SP12 seeks to ensure the conservation of heritage assets, their setting, and the wider historic environment.

10.4.7 Paragraph 129 of the NPPF states that the LPA should assess the particular significance of any heritage asset that may be affected by the development. Paragraph 131-2 states that the LPA should take account of the desirability of sustaining and enhancing the significance of heritagte assets and that great weight should be given to their conservation. Paragraph 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

10.4.8 Paragraph 134 of the NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

10.4.9 Paragraph 135 of the NPPF sets out that the effect of an application on the significance of non-designated heritage assets should be taken into account in

determining applications. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

10.4.10 There is a legal requirement for the protection of the Conservation Area. The Legal Position on the impact on these heritage assets is as follows, and Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provide:

—In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are —the planning Acts”.

10.4.11 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: —*In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

10.4.12 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given —considerable importance and weight” when the decision-maker carries out the balancing exercise.”

10.4.13 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority‘s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against

planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

10.4.14 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

Heritage Assessment:

10.4.15 In essence, the main heritage assets to consider are:

- Tottenham Historic Corridor
- North Tottenham Conservation Area, including the other listed and locally listed building beyond the immediate vicinity of the site No 744, Warmington House (listed grade II)
- Nos 746-750, locally listed, proposed to be demolished
- Nos 790-814 High Road on the north side, most of which are listed at grade II and II* (the northern terrace);

- No 707, High Road (listed grade II)
- No 705, High Road (locally listed)
- St Francis De Sales RC Junior School ad Presbytery (Locally Listed)
- Nos 743-759 on the south side, locally listed
- Nos 793-829 on the south side, listed (grade II) and locally listed
- 2-4 Park Lane (Locally Listed)
- Bruce Castle Conservation Area
- Alexandra Palace and Park Conservation Area and Registered Historic Park
- Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield

10.4.16 One of the most significant aspects of the conservation area is that it is part of a long established route. Tottenham High Road is now, and has been for many centuries, a main route into London from the north. The Roman road, known as Ermine Street followed parts of the High Road. In the Middle Ages, settlement was strung out along the road. During the 18th century, fashionable houses were built along the High Road, and later, as mass transport developed in the form of

railways and trams, the High Road became infilled with houses, shops, and grand civic and commercial buildings.

10.4.17 The junction at Northumberland Park and White Hart Lane forms a historic village core with an intense and highly significant cluster of Statutorily Listed buildings (mainly grouped on the east side of the High Road), and Locally Listed buildings. Paragraph 4.28 of the Tottenham Historic Corridor Appraisal (adopted 2009) states- ‗This section of the eastern side of the High Road is fronted by some of the best preserved groups of the substantial Georgian properties that characterise much of the area'. Unfortunately, many of these buildings have been vacant and neglected for over 15 years and are included in Historic England's ‗Heritage and risk' register.

10.4.18 The 18th Century Georgian town houses on the eastern side of the High Road adjacent to the stadium are vital and distinctive elements of this part of Tottenham. There is a distinctive and idiosyncratic quality to this part of the conservation area, resulting from the ‗interweaving' of several phases of developments of North Tottenham: the high quality Georgian buildings juxtaposed with the later mainly two to three storey Victorian and Edwardian buildings along with the Tottenham Hotspur Stadium and the latest Lilywhite Lounge rising above the Georgian terraces, as viewed from White Hart Lane. The High Road, however, appears distinctive with the general homogeneity in scale and massing of the various buildings, built up to the pavement.

10.4.19 The Tottenham Hotspur Football Club has great cultural significance not only within the local area but beyond London. On match days, the area transforms with football fans flocking into the stadium, with many businesses thriving on match day economy. The club's association with Tottenham High Road is over 130 years old. The club derives its name from the wife of the owner of Percy House, 796 High Road, who was the grand-daughter of the Earl of Northumberland and descendant of Hugh ‗Hotspur' Percy (1364-1403) after whom Tottenham Hotspurs Football Club was named[1].

10.4.20 Notwithstanding the above, the current stadium's architectural contribution to the setting of the conservation area is negative and even though set back, its relationship with the High Road is poor. This section of the High Road originally contained a row of unlisted, locally listed buildings and one listed building behind which the Stadium almost existed unobtrusively. As already stated above, this group of buildings has been demolished as part of the part implementation of the previously granted scheme. Paragraph 4.36 of the adopted appraisal described these buildings as:

‗The section of the High Road between Paxton Road and Bill Nicholson Way is primarily lined with three storey Victorian buildings that front directly onto

the road. They have shops at ground floor level, with two floors of residential accommodation above. Nos. 754 to 766 (even) are local listed buildings, typical of the narrow fronted Victorian shop houses of approximately 6m wide, that are common along the High Road. Together with Nos. 752A to C this terrace is constructed of yellow London stock brick, Nos. 752A to C with red brick dressings. Unfortunately, Nos. 764 & 766, now have rendered facades, „boarded up" windows and their poor condition diminishes their contribution to the streetscene".

10.4.21 The demolition has caused the uninspiring frontage of the existing stadium to be exposed detracting from the conservation area. The demolition has also resulted in a break in the High Road, thus causing harm to the significance of the conservation area and its setting.

10.4.22 A further three locally listed buildings are being proposed to be demolished. These are described in the applicant's appraisal as:

a) **No. 750, the former White Hart public house** is a three storey local listed Victorian building that is constructed of red brick, with stone mullioned casement windows and decorated moulded double gables on both street elevations. Its ground floor pilasters and cladding is in granite and it has a splayed corner with a distinctive arched entrance. Although the building has been detrimentally altered through the introduction of unsympathetic fascia signage, it is of architectural interest.

b) **No. 748, The Red House**, is a grand three storey locally listed late Victorian building, which is constructed of red brick with steeply pitched double gable ends to the High Road, slate roofs and tall red brick chimney stacks. The first and second floors are delineated by stucco stringcourses, and both the High Road and Bill Nicholson Way elevations have a first floor central white painted canted oriel window with a decorated parapet.

c) **No. 746 (former Tottenham Dispensary)** is an attractive symmetrical three storey red brick Edwardian local listed building with a Portland stone ground floor façade and an arched central entrance flanked by stone columns with a semi-circular fanlight over the door. The stone entablature fascia is inscribed „TOTTENHAM AND EDMONTON DISPENSARY'. It has a prominent projecting stone parapet cornice with dentils and panelled blocking course, and tall brick chimney stacks at each end.

Historic England's view

10.4.23 Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. It summarises its comments as follows*: „In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to preserve the setting of*

a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done."

Mayor of London's view

10.4.24 GLA officers concluded that the proposals will cause substantial harm to the significance of the Conservation area and that although the substantial public benefits arising from the proposal could outweigh the loss of the buildings that the applicant should consider relocating the frontage of the Dispensary in the Tottenham Experience terrace and relocate Bill Nicholson's office on the museum. They considered that harm to the other heritage assets was outweighed by the considerable public benefits. However the Mayor was of the view that the loss of the locally listed buildings was unacceptable and they should be retained.

Impact of demolition

10.4.25 It is accepted that the applicant's Heritage Statement is well detailed and researched. The Conservation Officer agrees with the assessment in paragraph 1.2.2 that *'The recent consented demolition.....detracts from the conservation area and the setting of the listed buildings in the conservation area.*' However, her view is that it fails to acknowledge that the demolition was part of the previous consent and should be assessed cumulatively with the additional demolitions proposed.

10.4.26 It is the view of the Council's Conservation officer that the cumulative impact of the already demolished buildings in addition to the further demolition proposed would have a negative impact on the conservation area and on the continuity of the High Road as is evident already.

10.4.27 In the Conservation Officer's view, whilst the demolition of the buildings as part of the implemented works cause loss of significance to the linearity of the High Road, the three locally listed buildings, along with Warmington House, form an important group that to some extent reinforce the scale and building line of the High Road at this end of the stadium. Additionally, whilst in a run-down neglected condition, the locally listed buildings are an attractive group with significant architectural detailing that contributes positively to the conservation area as well as the setting of the listed building.

10.4.28 The current proposal is considered to be causing further harm to the continuity of the conservation area and the historic corridor. At the time of the previous application, in order to facilitate the stadium development (prior to Barnwell Manor case law and the NPPF) demolition was agreed despite the substantial harm with the agreement to protect and preserve the three locally listed buildings (Nos 750, 748 and 746) and the listed building (Warmington House, No 744) at the southern end of the development. This was following several efforts and negotiations from Historic England, SAVE Britain's Heritage and the Victorian Society along with Haringey's own Conservation Officer. On balance, the podium level interaction along the High Road and the retention of the remaining four buildings was seen to provide some continuity to the High Road.

10.4.29 The new scheme proposes further demolition of three locally listed buildings, leaving only the listed Warmington House on this stretch of the High Road. It is the opinion of the Council's Conservation Officer that, the proposed demolition, cumulative with the consented demolition, would cause substantial and irreparable harm to the continuity of the historic corridor, the conservation area, the listed and locally listed buildings within it and their setting.

10.4.30 The impact of demolition on the setting of other listed buildings (the Northern Terrace) 707 High Road, and other locally listed buildings would be limited given their distance and proximity.

Significance of the Locally Listed buildings.

10.4.31 The applicant has summarised the significance of the locally listed buildings in the Heritage Statement. Much is made of the _loss of context due to the demolitions', not just from the recent demolitions arising from works to implement the current planning permission but also the incremental loss of the setting and significance of these buildings as the stadium itself expanded.

10.4.32 Based on their own assessments as well as the Council's Appraisal, Haringey's Conservation Officer considers the significance of these buildings to be high in terms of their architectural, historic and communal value. The officer does not consider the poor condition of their interiors (which is not unusual in locally listed buildings as they are not protected) to be a reason for diminishing their local contribution to the conservation area.

10.4.33 The Council's Conservation Officer does not agree with the applicant's assessment of the architectural and aesthetic significance of the building on the basis of their unkempt condition and _lossof context'. The Heritage Statement is considered by the conservation officer to not acknowledge that the demolition of local buildings which has contributed to the loss of context was part of an agreed plan to facilitate the stadium's development with the agreement to retain these particular buildings.

10.4.34 Based on its assessment, the applicant implies that the loss of the buildings would cause less than substantial harm, since they have already lost their context and that their unkempt and vacant condition has diminished their significance. However the Council's Conservation Officer disagrees and attributes high significance to these buildings individually, and concludes that they contribute positively to the conservation area's architectural, historic and communal value. It is therefore the view of the Conservation Officer that their demolition would cause substantial harm to the conservation area and its significance.

10.4.35 Additionally, their loss would also cause substantial harm to the setting of Warmington House, a statutorily listed building. The buildings together form a group and are part of the continuity of the High Road's past and contribute to Warmington House's setting.

Justification of demolition

10.4.36 Paragraph 4.2.14 of the applicant's heritage statement states that 'The demolition of the three locally listed buildings is proposed in order to address two key issues: crowd flow safety and townscape'. Paragraphs 4.2.15 to 4.2.41 go into details of how the demolition would achieve safer pedestrian flow and that the proposed Tottenham experience building would enhance the townscape of the High Road.

10.4.37 In terms of townscape, the applicant's Heritage Statement argues that the replacement of the buildings 'would allow a more holistic approach to the design of the stadium development, transforming the way in which it will address and connect with the High Road and resulting in an overall enhancement of the character of the conservation area' (paragraph 4.2.18). It further states that 'The significance of the locally listed buildings would be partially retained by salvaging artefacts and elements of the building for relocation and/or reuse within the proposed Tottenham Experience Museum'. This includes: the shop front of the 'Tottenham and Edmonton Dispensary'; Bill Nicholson's panelled office in the Red House; and possibly elements of the façade such as the bay window (paragraph 4.2.23). It further states that the local historic significance of the buildings would be recorded in the form of virtual interactive exhibits in the proposed Museum.

10.4.38 The design of the proposed buildings and their townscape contribution is discussed separately in the relevant section, under the heading 'Tottenham Experience and Warmington House'. With regards to the townscape, the Conservation Officer considers that the High Road is a diverse mix of Georgian, Victorian and Edwardian buildings, mainly two to three storeys in red or yellow stock brick. Whilst there are inter-war and post war buildings interspersed, the general homogeneity of scale and massing prevails throughout, providing

continuity along the High Road. This in essence, is the townscape of the area. The three buildings proposed to be demolished contribute positively to this townscape.

10.4.39 The applicant argues that the proposed terrace would ‗allow for a more holistic approach to the design of the stadium development'. The Conservation Officer agrees with this argument to a degree in that that the materials and, to an extent, the scale would form a transition between the stadium and the High Road. Whilst this may have some townscape benefits, it would not outweigh the substantial harm caused by the loss of the locally listed buildings and the substantial harm caused to the setting of Warmington House.

10.4.40 The three pieces of artefacts and façades that would be ‗saved' and placed within the interiors of the Tottenham Museum would be taken out of their original context and would not overcome the total loss of their significance. Whilst there could be an argument that part of their communal significance is being retained by way of interpretation, this would not outweigh the substantial harm.

10.4.41 Additionally, paragraphs 4.2.19 and 4.4.19 of the Heritage Statement discusses the options of retaining the three locally listed buildings and the impact it may have on the delivery of the project. It claims that the layout of the buildings is such that they cannot be incorporated within the new terrace. It also states that the condition of the building and spaces available could not be utilised fully in the manner that the current proposal does. It states that the Tottenham Experience as well as the Skywalk would then be relocated to the rear, taking away active frontage from the High Road. The Conservation Officer disagrees with this proposition as no such alternatives have been presented that would evidence this argument. The options appraisal only talks about the related crowd flow safety issue but does not discuss issues around the functionality (or lack of) of the locally listed buildings. The Conservation Officer, therefore, disagrees with this justification.

10.4.42 The second, and more important justification for the demolition of the locally listed buildings is the issue of crowd safety. This issue is dealt with above at para 10.2.51-55. In terms of the balance with para 133 of the NPPF, i.e. whether the loss is necessary to achieve substantial public benefits, that balance is addressed in the conclusions to the report.

10.4.43 Overall, the Conservation Officer concludes that the substantial harm caused due to the demolition of the three locally listed buildings on Warmington House, the conservation area, and their setting is not justified. The crowd safety argument requires demolition of three locally listed buildings and would cause harm to the conservation area, the listed building and their setting. Recreating a new terrace in modern materials, whilst it may respond to the Stadium's design, does not overcome the substantial harm caused by the loss of three positively contributing

buildings. The heritage benefit in retaining the three pieces of the facades and artefacts is limited and as such does not overcome the substantial harm.

Impact of the proposed development on the historic environment

The Stadium

10.4.44 The Council's Conservation Officer acknowledges the proposed new stadium to be an exceptionally high quality design. However, notwithstanding the quality of the design, it is the Officer's view that the scale, height and massing of the structure, whilst established by the previously consented scheme, remains alien to its High Road context, and would therefore not preserve the setting of the High Road, the wider conservation area and other designated and non-designated heritage assets, especially the listed buildings along the North terrace.

10.4.45 However it is the view of the Conservation Officer that this harm would be less than substantial as there is already a stadium on the existing site, albeit set back from the road and that the harm (of the stadium only) would be no greater than the consented scheme. The stadium would also have an impact on the setting of the other listed and locally listed buildings along the west of the High Road. This again, would be no greater than the consented scheme and would be less than substantial. Due to its high quality design, the new stadium would provide a greater degree of enhancement than the existing stadium or the consented scheme, providing considerable heritage benefit. The Council conclude, that the heritage benefit of replacing the negatively contributing existing stadium with the proposed high quality new stadium would overcome the less than substantial harm to the setting of the conservation area and the listed (the Northern Terrace and 707 High Road) and the locally listed buildings on the west side caused by its scale.

Tottenham Experience and Warmington House

10.4.46 The Conservation Officer sets out that while the Tottenham Experience may have an appearance of a three storey terrace when viewed from the High Road "the Tottenham Experience' is actually a much larger building conjoined with the southern podium and plinth. The terrace would be on either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this "two storey' structure would be the same height as the listed building itself. To the rear, there would be an atrium connecting the rear of the building to the public square. The works would restore the listed building, including repair works on all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum. The applicant sets out that this part of the museum would encapsulate not only the history of the football club but also reflect the history and cultural heritage of Tottenham as a place.

10.4.47 The Heritage Statement justifies this approach stating that Warmington House was always part of a terrace and having lost its ‗context' with the further proposed demolition of the three locally listed buildings, the proposal would enhance its original setting, albeit in a contemporary manner.

10.4.48 The Council's Conservation Officer welcomes the retention of the listed building as well as its restoration, and the treatment to the front façade with the doorsteps and railings reintroduced to provide some defensible space and would consider this as heritage benefit. She also agrees that whilst rather simple, the new terrace reflects the scale and massing of the listed building and the High Road and would be of a high quality and contemporary design that responds to the character of the new stadium. However, the proposal would cover the Listed Building entirely on three elevations, and in the Conservation Officer's opinion, would not provide an appropriate context to the Listed Building causing substantial harm it. In addition, the rear atrium would only provide glimpses of the listed building to the passing crowd without any real interaction with it. As such the proposal would, cause substantial harm to the building's setting because it will be covered on three elevations.

10.4.49 Whilst the glass insertions on either side do help to break the elevation to provide a distinction with the listed building, it does not successfully overcome the substantial harm to the listed building and its setting. The heritage benefit of restoring and converting the building may offset some of the harm, but still does not successfully overcome the substantial harm.

10.4.50 In terms of the new terrace and its impact on the conservation area and the setting of the locally listed building immediately west and south of it, the Conservation Officer gives some merit to its design as it does respond to the High Road in terms of scale and design of the new stadium. It provides some degree of enhancement to the setting of the High Road by providing a continuous elevation, as the locally listed buildings currently provide. However, this does not reflect the character of the High Road itself. As such, the Conservation Officer considers that the enhancement provided by the high quality design of the new terrace does not overcome the substantial harm caused by the demolition of the locally listed buildings or the impact on the conservation area or to its setting.

10.4.51 Should the planning application be granted the Conservation Officer sets out that following conditions should be included on the associated Listed Building Consent Decision Notice:

1. All works should be made good to match the existing fabric in colour, material and texture. If works cause any un-intentional harm to the existing fabric, this should be repaired or replicated to match existing.

2. Any hidden historic features (internal or external) which are revealed during the course of works shall be retained in situ, work suspended in the relevant area of the building and the Council as local planning authority notified immediately. Provision shall be made for the retention and/or proper recording, as required by the Local Planning Authority.

3. Details of materials including external finishes, metal and any masonry should be submitted to the Council for approval. This should be an appropriate lime based mortar such as 1:2:9 (Cement: lime: aggregate) and match existing mortar in colour and texture.
4. A detailed and itemised schedule of works, methodology statement, detailed plans and drawings as appropriate in respect of the following, shall be submitted to and approved by the Local Planning Authority before the relevant part of the work is begun.
    a. The staircase, its material and treatment of the defensible space immediately in front of the House;
    b. Repair, reinstatement of fabric including brick and mortar repairs and any additional works affecting the internal and external fabric of the listed building;
    c. Detail of structural investigations to verify the loading capacity of the building and any concealed damage to the structure that may occur due to the new extensions on either side;
    d. Further details of how the new structure would be integrated with the existing listed building;
    e. All doors, windows and rainwater goods;
    f. Details of all decorative profiles on walls, ceiling surfaces, staircases, handrails, floor finishes, doors and fanlights as applicable; and,
    g. Location and finish of all mechanical ventilation, louvers, and communal satellite as applicable.

    THFC to secure a Heritage Management Plan for Warmington House and submit to Council and Historic England for approval. THFC to bind successors in title to the provisions of the Management Plan. (This can also be part of Sec 106)

<u>Public realm</u>

10.4.52 The proposed public square, beyond the Tottenham Experience, is at nearly three storeys height accessed from street level. This would leave a wide pavement branded in the alterative grey and white stripes along the High Road itself. Whilst the public square itself may be bigger than the area of Trafalgar Square with many facilities, this does not interact or contribute to the conservation area the listed and locally listed buildings within it, or its historic context. Most of it is along the southern edge of the Stadium, along Park Lane, again at three storeys. As such the proposed ‗pavement widening' would neither preserve nor enhance the High Road and by virtue of its apparent height and finishing would cause some harm to the conservation area, its setting and the listed and locally listed buildings within it. There are no heritage benefits

presented by the public realm that would outweigh the less than substantial harm.

Hotel

10.4.53 The scheme further proposes a 22 storey hotel at the south western corner of the site. Described in the application as both ‗blade shaped' and ‗Slab like'. The submitted Heritage Statement states that ‗In views north along the High Road its narrow southern end would form an elegant marker, forming a pleasing contrast between its vertical line and the horizontal emphasis of the proposed stadium'.

10.4.54 Whilst the Council's Conservation officer agrees that the views of the sharp edge of the hotel would be elegant when viewied from the south of High Road, the structure would introduce a scale and form that is unprecedented in this part of the conservation area. As such the structure would have an impact on the setting of the conservation area and the setting of the designated and non-designated assets within it such as the locally listed buildings on Park Lane. Additionally, the wider elevation of the Hotel would, along the High Road, create a slab like structure rising behind Warmington House and the new terrace proposed. Whilst the height of the stadium is offset from the immediate vicinity of the listed building, the height and width of the Hotel would have a direct impact on the setting of the listed building and contribute to its diminishing prominence on the High Road. As such, it would not preserve or enhance the setting of the listed building and would cause substantial harm to it. Additionally, it would cause some harm to the setting of the conservation area. By virtue of its height, the hotel would also be visible from the Alexandra Palace Park and may also be visible from Bruce Castle Park and would cause some harm to their setting, but only with respect to views from both parks.

10.4.55 The Conservation Officer therefore disagrees with the Heritage Statement which concludes that the Hotel would not have a negative impact on the significance of the listed buildings within its immediate vicinity.

10.4.56 Whilst it may be an attractive addition from the southern end to the skyline and may provide some level of enhancement to the setting of the conservation area, it does not overcome the less than substantial harm to its setting or the substantial harm to the listed building and its setting.

Reserved matters: Extreme Sports Centre and residential towers

10.4.57 The scheme further seeks outline permission for a cluster of residential towers on the southern edge of the stadium. Whilst materials are subject to reserved matters, the towers are likely to be clad in masonry materials such as brick, terracotta or concrete. In terms of their design, appearance and materiality, the towers would form a coherent group.

10.4.58 Additionally, the scheme proposes an Extreme Sports Centre over 51 m tall (17 storeys) with a dynamic form to accommodate both outdoor and indoor facilities, including climbing wall inside and on the building‘s exterior.

10.4.59 From a conservation point of view, the proposed towers together with the Hotel, would form a cluster of tall buildings and would introduce a scale and form unprecedented within the setting of the conservation area. Residential towers were consented as part of the previous scheme but these were up to 20 storeys with top floors receding in a manner that the tallest elements were closest to the stadium. As such the new scheme introduces a higher and, therefore, more intrusive set of towers that would neither preserve nor enhance the significance of the conservation areas, the listed and locally listed buildings or their settings, causing harm. Given the context of the stadium and the previous consent, the Conservation Officer considers the harm to be less than substantial.

10.4.60 With respect to justification, it is the Conservation Officer‘s view that there appears to be no heritage or townscape based evidence that justifies the positioning, location or the height of the proposed towers. Whilst there is merit in the design of these towers, this would not outweigh the less than substantial harm. Planning Officers are of a different view and as set out above believe that there is a townscape rationale for tall buildings in this location marking the location of the stadium.

10.4.61 Additionally, whilst the visibility of the proposed cluster of towers from Bruce Castle is limited there would be an impact on the Conservation Area albeit less than substantial. This harm, however, would not be offset by any heritage benefits.

10.4.62 The visibility of the towers would be more extensive from Alexandra Palace Park, given the topography and the cluster would have an impact on the Alexandra Palace Park Conservation Area and the Historic Park. However, it would still be less than substantial and given their distance, context of the stadium and beyond, would be overcome by design and townscape (mainly skyline) benefits.

10.4.63 Outside the borough boundary, the proposed cluster of towers would also have an impact on the Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield. The Conservation Officer considers that given the distance and the alignment of the street, the cluster would have minimal impact on the conservation areas. If at all visible, the existing towers such as Brooke House would mitigate the potential impact of the new towers as they would form a backdrop to already existing higher blocks in the vicinity. The Conservation Officer therefore, concludes that with regards to the two nearest conservation areas in Enfield, the impact of the towers would be negligible.

<u>Conclusion</u>

10.4.64 The Conservation officer has assessed that there is substantial harm to designated heritage assets in the following respects:
-demolition of the locally listed buildings
-impact on the setting of the Warmington House, both from the impact of the demolition of the adjoining building, and the effect of the new terrace but also from the impact of the proposed tall buildings
-impact on the setting of 4 Conservation Areas.

10.4.65 It is acknowledged by the Council's Conservation Officer that the proposed scheme is of a high quality design. However the Conservation Officer considers that the current proposal would have a much greater degree of intervention than the previously consented scheme. This includes further loss of historic buildings (in addition to the demolished buildings as part of the pervious consent- part implemented) and impact on the listed, locally listed buildings and the conservation areas and their setting. The introduction of the cluster of towers would, she considers also cause further harm introducing an urban form and scale unprecedented in the area. The Conservation Officer's conclusion overall, is that the proposal would lead to loss of significance of heritage assets and their setting, causing substantial harm to them and would not provide sufficient heritage benefits that would outweigh this harm. These conclusions are materially different from the conclusions reached in the applicant's Heritage Statement.

10.4.66 In making the above assessment, great weight has been given to the preservation or enhancement of the heritage assets as per the Council's statutory requirement.

10.4.67 At the end of this report the justification for the demolition of the locally listed building, the new buildings and the overall balance of heritage harm against other material considerations is set out. Here it is concluded that whilst the substantial harm, and less than substantial harm, caused has been given great weight the overall substantial benefits of the proposal when viewed as a whole outweigh the less than substantial harm and overall the harm caused is necessary to achieve the substantial public benefits that outweigh the harm and loss.

10.5 TRANSPORT

Introduction

10.5.1 The proposed site is enclosed by the recently implemented supermarket and technical college to the north, to the east by Worcester Avenue, to the west by the A1010 High Road and to the south by Park Lane. This section of the High Road has a public transport accessibility level of 4/5 (medium to high) and is part of the strategic road network (SRN). There are ten bus routes serving this area: 149, 279, 259, 341, 476, 123, 243, 318, W3 and 349 with bus stops on the High

Road and on Northumberland Park. There are two rail stations within reasonable walking distance of the site. White Hart Lane station is approximately 450m to the west and provides access to services on the Seven Sisters branch of the Lea Valley line. Northumberland Park station is approximately 600m to the east and provides access to services on the West Anglia main line. The closest underground station is Tottenham Hale on the Victoria Line, approximately 2.2 km from the stadium; Seven Sisters is 2.3km to the south of the stadium. Although Tottenham Hale station is closer to the stadium than Seven Sisters station most spectators currently use Seven Sisters Station as it perceived to be closer, is more accessible by foot and is more easily reached by bus.

10.5.2 There have been a number of changes to the local transport infrastructure since the current planning permission was granted in 2011 and 2012. Other planned transport improvements are due be implemented before 2018 when the new proposed stadium is due to become fully operational. A summary of the changes are outlined below:

1) The completion of the Victoria Line upgrade, which has provided faster and high frequency trains. A new timetable to be implemented in 2016 will see all trains running to Walthamstow Central via Tottenham Hale. This will increase the capacity at Tottenham Hale.

2) White Hart Lane, which was formally on the Abellio Greater Anglia line, has been taken over by TfL and is now part of the London Overground network. This will include new rolling stock from 2018 which will increase the line‘s capacity. There is also a proposal to remodel the station to provide better connectivity to the new stadium, and improve platform loading.

3) Upgrade of Tottenham Hale station and bus interchange, and improvements to the pedestrian environment resulting from the removal of the Gyratory and the introduction of the Green Link has enhanced Tottenham Hale as an alternative to Seven Sisters station.

4) The Mayor‘s Cycling Super Highway 1 (CS1) is currently being implemented and will be competed in 2016. The new cycle route will provide better north/south cycling connectivity to the new Stadium which is located at its planned northern terminus.

Relevant Policy

10.5.3 The transport impact of the development has been assessed in the context of the following:

London Plan
Policy 6.1: _Strategic Approach‘.

Policy 6.3: ‗Assessing Effect of Development on Public Transport capacity',
Policy 6.7: ‗Better Streets and Surface Transport',
Policy 6.9: ‗Cycling'.
Policy 6.10: ‗Walking'.
Policy 6.11: ‗Smoothing Traffic Flows and Tackling Congestion'.
Policy 6.12: ‗Road Network Capacity'.
Policy 6.13: ‗Parking'.

Local Plan, Strategic Policies
Policy SP7: ‗Transport'. Focuses on promoting sustainable travel and making sure all development is properly integrated with all forms of transport, in line with the Government's transport objectives set out in section 4 of the NPPF and the Mayor of London's strategic transport approach in the London Plan.

Saved UDP Policies
M9: ‗Car Free Residential Development'. Supports car free development in locations where there are alternative and accessible means of transport available; public transport accessibility is good; and a controlled parking zone exists or will be provided prior to occupation of the development.

M10: ‗Parking for Development'. Development proposals will be assessed against the parking standards set out in Appendix 1 of the UDP. Proposals that do not meet these standards will not normally be permitted. Parking requirements will be assessed on an individual basis as part of the Transport Assessment.

Haringey's Draft Development Management Polices DPD: Draft DM DPD policies relevant to the transport assessment of this application are:
DM31: ‗Sustainable Transport'.
DM32: ‗Parking'.

Event Day Assessment

10.5.4 This section will review the proposed increase in the capacity of the stadium over that previously granted and the proposed increase in the number of non-football major events to be held.

10.5.5 The existing planning permission for the site includes a stadium with a capacity of 56,250. The impacts of the previous stadium on the transportation and highways network have already been assessed as part of planning application HGY/2010/1000, and mitigation measures were agreed as part of the S.106 agreement for that permission. Some of these measures have already been implemented including the first phase of the new event day CPZ.

10.5.6 This application is seeking to increase the capacity of the stadium to 61,000 (an additional 4,750 above the 2010 approved scheme).

10.5.7 Given the length of time since the 2010 approved scheme and the improvements in public transport infrastructure either planned, or already implemented, the applicant's transport consultant predicts an increase in the expected modal shift from private car to public transport from that assumed in the consideration of the existing permission. This means that the proposed increase in capacity is not expected to result in an increase in the number of car journeys assumed in the existing permission.

Modal Split

10.5.8 Out of 61,000 spectators of which 3,000 are away supporters, 77-80% are forecast to arrive by public transport. This will be principally achieved making greater use of Tottenham Hale Station which is currently not very well used on match day for arrival or departure, with only some 617 spectators using the station on arrival and 763 spectators on departure. In the future 7930 spectators are expected to use the station on arrival and 9445 spectators on departure. It also intended that greater use will be made of Wood Green and Alexandra Palace stations with 3050 spectators forecast to use these stations. The transport strategy proposes two shuttle bus services as part of the mitigation strategy - one to Tottenham Hale and the other to Wood Green and Alexander Palace stations. As well as reducing the proportion of journeys by car the provision of the shuttle bus service is predicted to reduce the congestion pre and post match at Seven Sisters and White Hart Lane stations.

Arrival and Departure profile

10.5.9 At present 85% of spectators arrive and depart within 45 minutes of kick off and final whistle respectively, with some spectators leaving before the final whistle. This peak arrival and departure adds to the pressure on the public transport system, resulting in longer queuing times at stations and traffic delays and congestion on the local highway network.

10.5.10 The applicant has suggested that by providing better facilities at the stadium and introducing more post and pre match entertainment, some 30% of spectators (18,300) will arrive at the stadium early (60-90 minutes before kickoff); and 35.2% of spectators arriving in the local area before a match.

10.5.11 The TA assumes that 30% of home spectators and 5% of away supporters will delay their departure by at least 20 minutes. The Transport Assessment does not provide any evidence to demonstrate that this proportion of spectators can be retained post match for mid evening week events. However given the increase in the capacity of the stadium and the increase in demand on local transport infrastructure, it is likely that visitors will arrive in the area earlier in order to ensure that they can enter the stadium before kickoff; and in addition the

proposed attraction and retention measures will help alleviate the peak loading on the public transport system.

Walking

10.5.12 White Hart Lane is the closest Station and is 6 minutes walk from the stadium. The next nearest stations are Northumberland Park station [0.8 km], Seven Sisters [2.3 km] and Tottenham Hale [2.2km].

10.5.13 The Transport Assessment predicts that post match there will be some 12,810 spectators walking to the Victoria Line, Seven Sisters (6,710) and Tottenham Hale (6,100) station, with 14,945 spectators walking to the local rail stations, White Hart Lane (7,930) and Northumberland Park (7,015). The Council's Transportation Officer accepts this forecast. To assist with the efficient dispersal of spectators there will need to be an agreed communication strategy. Measures would include displays that advise spectators of the queuing times at the various stations in order to encourage a more even distribution of spectators between the stations. An agreed communications strategy is to be secured in the S.106 agreement.

10.5.14 The applicant has submitted a revised PERS (Pedestrian Environment Review System) audit of the five main walking routes to and from the local transport interchanges.

- White Hart Lane Station , via, the High Road/ White Hart Lane and via High Road/ Whitehall Street and Love Lane
- Northumberland Park Station via Park Lane and Shelbourne Rod
- Tottenham Hale Station via the High Road, Chesnut Road and Monument Way, Hale Road and Ferry Lane.
- Seven Sisters Station via High Road and Seven Sisters Road
- To the North of the Stadium towards Enfield via the High Road

10.5.15 The PERS audit does not include the routes to the coach parking on West Road, Tariff Road, Brantwood Road and Pretoria Road and the section via Northumberland Park, Blaydon Walk and a section of Willoughby Park Road. However as the applicant's TA is only proposing an average 1.5% (approx 915 spectators) travelling by coach or a worst case 2% (1,220 spectators maximum), a PERS audit of the coach parking routes is not considered critical to the overall transport strategy. The Council will however be seeking to include routes to the coach parking locations as part of an overall comprehensive signage strategy of the routes to and from the development to be agreed and implemented through the event day management plans secured by the S.106 agreement.

10.5.16 The Transport Officer has reviewed the PERS audit for the 5 main walking routes identified above and concludes that the only route which will require direct

mitigation will be the Stadium to White Hart Lane Station route. This route scored poorly due to lack of resting points, poor personal safety due to a lack of CCTV, poor legibility due to a lack of route signage, poor quality of environment due to poor surface quality and poor directness due to parked cars and bollards.

10.5.17 In addition the PERS audit has identified some other areas where the RAG (Red, Amber, and Green) rating is red these areas include:

1) Westside of Bruce Grove/High Road between Bruce Grove Station and St Loys Road, and west Side of Bruce Grove between Bruce Grove Station and Forster Road. This area is currently been reviewed jointly by the TfL and Haringey and a funded scheme is being developed to address some of these issues, hence no mitigation is required as part of this application.

2) Chesnut Road at the junction with Fairbanks Road. Improvements are planned for this area and £220,000 has been agreed as part of the revised S.106 agreement under planning application HGY/2010/1000 HGY/2011/2351.

Cycle

10.5.18 The applicant‘s modal split prediction suggests that some 610 people will arrive and depart by cycling. This accounts for 1% of the mode share. The Transport Officer would have expected the proposed mode share to be higher (3% or more) considering that provision is being made to provide for prioritisation of a proportion of season tickets and general release tickets for local residents combined with the fact that currently some 5% (2900) spectators live within 5km of the stadium. Discussions with Islington Council has revealed that inadequate cycle parking at Arsenal‘s Emirates Stadium is a contributory factor in not achieving that scheme‘s cycling modal split target. The Council will therefore require the applicant to produce a match day cycling strategy which seeks to actively promote cycling to and from the stadium and to provide access to adequate secure cycle parking.

Match Day Car usage

10.5.19 The existing conditions report suggests that between 37.8%-43.9% of spectators arrive in the local area by car. There is a strategy in place to reduce the number of car parking spaces available and restrict spectator‘s ability to easily access on street and off street car parking spaces. This combined with the proposed enhancement in public transport infrastructure and event day travel plan measures should make it possible to achieve the proposed car mode share. The key driver to achieve the proposed modal shift is behavioural change as a result of increasing the current match-day CPZ from 221 hectares to around 716 hectares. A map of the proposed CPZ can be seen in the appendices. Phase 1 of

the revised event day controlled parking zone has been implemented, and the other phases will be implemented before the stadium is completed.

10.5.20 The proposed expansion of the CPZ beyond the A406 will help to facilitate the free flow of buses and pedestrians along the High Road and the bus diversion route. This will help to reduce the journey time of spectators to and from the stadium. The extension of the CPZ to the west will also help to facilitate the shuttle bus service to Wood Green and Alexandra Palace.

10.5.21 Officers have some concerns regarding the increase in the number of car parking spaces in the stadium and the car parking allocated to the Hotel which will be utilised by spectators on an event day. The access and egress via Northumberland Park and Park Lane are located where pedestrian flows will be very high post and pre match. In order to avoid conflict between cars and pedestrians, the Council will require safeguards to be included as part of the event management plan to restrict access to and from the car park before and after games when spectator flows are at the highest (30 minutes pre match and 40 minutes post match).

10.5.22 Similarly, given its proximity to the stadium, the vehicular access and egress to the hotel car park which is located on the High Road frontage will need to be restricted as part of the local area management plan to a minimum of 1 hour pre and post match.

National Rail

10.5.23 The revised transport assessment forecasts that some 34% of spectators will depart by rail, 20% from White Hart Lane and 14% from Northumberland Park Station. 35% of those departing from White Hart Lane will interchange at Seven Sisters Station and 21% of those departing from Northumberland Park Station will interchange at Tottenham Hale station. On arrival 21% of spectators will arrive at White Hart Lane Station and 15.8% to Northumberland Park station. Of the arrivals at White Hart Lane 31% would have interchanged from the Victoria Line, on the arrivals at Northumberland Park 17% would have interchanged from the Victoria Line at Tottenham Hale station. This reflects the current match day distribution.

10.5.24 The Event Day TA includes rail capacity analysis for all the local transport interchanges. The analysis includes midweek and weekend events, pre and post match. Existing and forecast local demand is included with a growth factor applied to reflect the 2021 forecast increase in local demand. Station configuration and platform capacity are also considered. The conclusion of the analysis for each interchange is as follows:

Northumberland Park/ Tottenham Hale Station:

10.5.25 For the purpose of the analysis the capacity is based on a service level of 4 trains per hour and is limited at 85% of actual capacity as requested by TfL. Between 18:00 and 18:30 there is an increased demand from commuters which will impact on spectators' ability to board the first train to travel north towards Northumberland Park Station from Tottenham Hale station. This will increase the pressure on the platform between trains with 186 spectators queuing between trains. The TA assumes that the loading on the platform will not exceed capacity. TfL initially raised concerns with the vertical circulation within the station and the ability of the existing escalator to clear the platform before the next train arrives. However, it has now been accepted that the situation is acceptable subject to the implementation of a station management plan that includes provision for additional LUL staff on match days.

10.5.26 It is forecast that post match at Northumberland Park there will be some 1057 spectators queuing outside the station for the northbound platform. The maximum waiting time for northbound spectators is predicted to be 22 minutes from arrival to boarding a train. The maximum duration of the northbound queue is predicted to be 33 minutes. The southbound queue is forecast to be 1,099 spectators with a predicted maximum waiting time of 26 minutes. The maximum duration of the southbound queue is predicted to be 33 minutes.

10.5.27 The Council has concerns regarding the operation of 12 car services at Northumberland Park station, and will need assurance from Network Rail and the rail operator that selective door opening will enable 12 car services to stop at Northumberland Park. In addition the footbridge to access the southbound platform is narrow and will reduce the rate of movement from the southbound platform. The applicant will therefore need to provide a crowd management plan to support the forecast increase in passengers expected at Northumberland Park Station. The above forecast is based on use of the existing footbridge used to access the southbound platform. This bridge is expected to be replaced as part of the proposed four tracking of the line. The proposed transport strategy will therefore not be affected by four tracking of the line.

10.5.28 Post match it is predicted there will be some 9,270 spectators arriving at Tottenham Hale, 5,585 will arrive on foot from the stadium, 1,795 will interchange from national rail, and 1,890 will use the shuttle bus service from the stadium to Tottenham Hale. As part of the event day management plan, specific measures will be required for Tottenham Hale Station in order to manage access into the station; the queue is forecasted to be a maximum of 900 spectators and will last for 29 minutes with a maximum delay per spectator of 6 minutes.

<u>White Hart Lane/ Seven Sisters Station</u>

10.5.29 There will be capacity constraints for northbound services between 18:12 and 19:30 when the background demand is greatest and is combined with spectators. This will result in fans and spectators waiting between trains at Seven Sisters Station. This is predicted to result in some 1,500 passengers queuing on the northbound platform. A station management plan for this station will therefore need to be agreed and as part of the event management plan.

10.5.30 It is forecast that post match at White Hart Lane there will be some 518 spectators queuing outside the station for the northbound platform. The maximum waiting time for northbound spectators is predicted to be 12 minutes from arrival to boarding a train. The southbound queue is forecast to be 2,177 spectators with a predicted maximum waiting time of 29 minutes. The maximum duration of the southbound queue is predicted to be 56 minutes. The area outside the station will require sufficient space to accommodate 2,250 spectators. In the long term it is planned that a spectator queuing area will be integrated into the High Road West redevelopment. In the interim queuing for the southbound platform will be via Love Lane, Whitehall Street and on the High Road. As stated above the PERS audit has highlighted that this route will require some improvements which will need to be secured through a S.106 obligation.

10.5.31 Pre-Match it is forecast that 14,620 spectators will be arriving at Seven Sisters station. It is predicted that 7,208 will exit the station and walk to the ground, 3,702 will interchange to national rail northbound to White Hart Lane and 3,350 will interchange to local buses. All the flows in the pre-match situation can be accommodated by the station with the exception of the Northbound platform which will need a management strategy to prevent overcrowding pre-match week days due to the higher background demand from commuters heading north.

10.5.32 In the post match situation it is forecast that 12,993 spectators will depart on the southbound line. It is predicted 6,765 will arrive on foot, 4,338 will interchange from White Hart Lane station and 1,890 will interchange from local bus services. The existing conditions report has highlighted that Seven Sisters station is often closed due to overcrowding. Officers have concerns regarding the additional demand at this station resulting from spectators travelling from White Hart Lane interchange at Seven Sisters station. These passengers will get priority access to the Victoria Line platform over those spectators/passengers that are queuing at surface level. Access to the station will have to be managed to prevent congestion within the station. The TA forecasts that there will be a maximum queue of 1,784 spectators queuing on the High Road outside the station on a weekend. The queue is predicted to last 1 hour with a maximum queuing time to board the train of 16 minutes.

<u>Buses</u>

10.5.34 Post match the High Road will be closed for a minimum of 30 minutes. As part of the previous S.106 agreement bus priority measures were secured to facilitate a bus diversion route via Northumberland Park, Willoughby Lane, Shelbourne Road, and Lansdowne Road. This measure ensured that southbound bus services are available southbound immediately post match and that the period north bound services are suspended for is kept to a minimum.

10.5.35 In addition the applicant is proposing to implement a shuttle bus service to Wood Green/ Alexandra Palace and to Tottenham Hale stations; the proposed shuttle bus service will account for 8.7% (5,307 spectators) on arrival and 7.7% (4,697) of spectators post match. Given that the bus journey time to Wood Green and Alexandra Palace is only some 15-20 minutes, with a maximum waiting time of 8 minutes for a bus, Officers expect many supporters would choose to use this option post match, rather than queuing for the nearer stations.

10.5.36 The shuttle bus to Tottenham Hale station will only cater for premium spectators (Box and Club level). In the event that the modal split target is not achieved within the first year of occupation the Tottenham Hale shuttle bus service would need to be reviewed to consider whether any further expansion of the shuttle bus service is appropriate in order to achieve the modal split target.

10.5.37 One of the keys to achieving the shuttle bus frequency is the implementation of the Match Day Controlled Parking Zone not only in Haringey but also in Enfield. This will reduce the number of spectator cars that are parked along the shuttle bus routes. Considering the importance of the shuttle bus in achieving the revised modal split target, the Council will require a S.106 obligation to secure the shuttle bus service level agreement in discussion with TfL. As part of the event management plan stewarding and crowd management measures will be required at the intersection of Willoughby Lane/Shelbourne Road and Park Lane to ensure that spectators accessing Northumberland Park station do not obstruct the bus diversion route. In addition as part of the shuttle bus strategy stewarding will be required at Tottenham Hale, Wood Green and Alexandra Palace to manage the arrival and unloading of buses efficiently.

10.5.38 The assessment of existing bus routes concluded that during the pre-match period there is a shortfall in bus services capacity providing a direct link from Seven Sisters station (the 149, 259, 279 and 349 routes). The shortfall is due to the background demand, and it is not considered possible to provide sufficient bus capacity to mitigate these impacts on an event day. It is predicted that the delay queues for northbound bus services will encourage the majority of spectators to walk from Seven Sisters, or interchange to the rail service. This is reflected in the forecast modal split with 17.3% of spectators walking or interchanging to travel north to the stadium. The Council will be seeking improved signage along the walking route as part of the signage strategy.

10.5.39 Post match these routes also suffer from high demand from spectators resulting in demand exceeding capacity, the closure of the High Road post match will also impact bus frequency. Spectators will therefore choose to walk to the local train/ underground stations. This is reflected in the post-match walking mode share to Seven Sisters and Tottenham Hale.

Coaches

10.5.40 The revised Transport Assessment forecasts a maximum 2% mode share by coach. Officers believe that there is potential to increase the proportion of supporters who travel by coach and further reduce the car mode share, particularly if supporters groups are targeted. The Council will therefore require the applicant to submit a Coach Strategy to achieve a higher coach mode share percentage as part of the travel plan targets. It is recommended that a 5% percentage modal shift is included as a travel plan target and the applicant provide a commitment as part of the S.106 agreement to promote coach service to achieve the model split target.

10.5.41 The existing coach parking is located to the north east of the stadium on West Road. The Transport Assessment has proposed providing coach parking on West Road, Brantwood Road, Tariff Road and Pretoria Road. A signage strategy along routes to the proposed coach parking locations will be required as part of the walking route upgrade.

10.5.42 The Area Management Plan and the coach strategy should include coach routing pre and post matches, via Watermead Way and Leeside Road to ease congestion on the High Road and Northumberland Park. Coach parking for Pretoria Road should be routed via the A10, White Hart Lane away from the ground.

Taxi

10.5.43 Taxis account for between 1.5% and 1.7% (915 and 1037 spectators) of the modal split prediction. It is proposed to introduce dedicated taxi drop off and collection bays as part of the highway design for Park Lane. However given the closure of Park Lane and Worcester Avenue pre-and post match and the closure of the High Road post match, dedicated taxi bays will not provide any substantial benefit to taxis on a match days. Taxis will drop off and collect passengers on the High Road where possible.

NFL

10.5.44 The TA forecasts that the proposed NFL match day scenario which will have fewer people arriving by car than for football matches. This is largely due to the origins of the trips being more dispersed. Only some 15% or 9,150 of spectators

are predicted to arrive by car. This will increase the loading on public transport with more spectators using the Victoria Line and the rail service to arrive and depart. The shuttle bus will be provided as on standard match days.

10.5.45 NFL games will take place at weekends with kick off at 14:30 and final whistle at 18:00. All the service uplift and transport infrastructure will remain the same as for a Premier League game. The Council‘s Transport Officer‘s review of the TA in respect of NFL is set out below.

10.5.46 The forecast arrival profile of NFL spectators at the Stadium is similar to that of football spectators with approximately 70% of spectators arriving at the stadium 45 minutes before kickoff. However due to the nature of NFL games 40% of fans are expected to arrive in the area earlier to spend time in organised fan parks. The applicant is proposing that by providing retention measures within the stadium they will achieve a lower peak departure profile with only 45% of spectators departing within 30 minutes at the end of an NFL game compared to 85% of spectators departing within 30 minutes at the end of a typical foot ball match.

10.5.47 The Council‘s Transport Officer considers the forecast of 40% of fans arriving earlier to be achievable. However additional measures are likely to be required to achieve the applicant‘s forecast of 55% of fans remaining within the stadium 30 minutes after the game has ended. A range of retention measures will therefore need to be agreed by the local planning authority before the stadium is occupied.

10.5.48 Based on the above departure profiles no queues are expected at White Hart Lane station on the northbound platform, 877 spectators are expected to queue for southbound trains, the queue is forecasted to last some 45 minutes with no single spectator predicted to queue for more than 16 minutes post match.

10.5.49 Northumberland Park will have a maximum queue length of 64 people travelling northbound with a maximum queuing time of 16 minutes, and maximum queuing time per spectator of 1 minute. The southbound service is predicted to have a maximum queue of 534 spectators and will last some 30 minutes with a maximum spectator queuing time of 14 minutes.

10.5.50 Pre-match there will be some queuing for northbound spectators travelling towards the stadium from Seven Sisters station, when interchanging from underground to rail, as some spectators will not be able to get on the first train. However this will be mitigated by the revised station management plan as part of the event management plan to be agreed by TfL. It is predicted that post match at Seven Sisters Station there will be a maximum queue outside the station of 101 spectators, the queue will last for 16 minutes, with a maximum queuing time of one minute per spectator.

10.5.51 The TA forecasts that Tottenham Hale will be used by 18% of spectators pre NFL match and 23% of spectators post match. Some additional station management measures will be required as part of the event day management plan to be secured as part of the S.106 agreement. It is predicted that some 400 spectators will be queuing, with the queue lasting for approximately 22 minutes and with a queuing time 2 minutes per spectator.

Concerts

10.5.52 When in use as a concert venue the Stadium will have a capacity of between 45,000 and 55,000 visitors. This is a 10,000 increase in the capacity compared to the previous approved scheme.

10.5.53 Officers agree with the submitted TA's conclusion that a concert would generate fewer trips by car due to the nature of the event with spectators travelling further to attend these events. Consequently there will be greater demand for public transport services. It is forecast that only 10% of visitors will travel by car. It is predicted approximately 50% of visitors will arrive at least 75 minutes before the concert begins. The departure profile will see some visitors departing before the concert ends, only 16% of visitors will remain post concert. Officers consider the proposed arrival and departure profiles are realistic and accurately reflect the potential loading on the public transport system.

10.5.54 Due to the forecasted departure profile with 65% of visitors departing within 15 minutes of the concert ending, a 55,000 capacity concert will result in post concert queuing for the southbound service at Northumberland Park. The queue is forecasted to last 90 minutes with a maximum queue size of 2031 visitors, the maximum queue per individual is predicted to be 47 minutes. The queue for the northbound service is forecast to be 15 minutes.

10.5.55 The queue at White Hart Lane will last for some 65 minutes with a maximum waiting time of 29 minutes. Seven Sisters will have a queue of 2,131 visitors, with maximum queue duration of 40 minutes, with a visitor waiting in the queue for at least 13 minutes. Tottenham Hale will have a maximum queue size of 2,531 with queue duration of 63 minutes, and a maximum wait per individual of 15 minutes. Shuttle bus service would be provided with the levels of service secured by the S.106 agreement.

10.5.56 Officers acknowledge that a 55,000 capacity concert will result in substantial queuing at the local public transport interchanges post the event. However providing the mitigation measures identified above for the football are also in place for concerts the impacts of the proposed concert can be managed.

Non-Event Day Assessment

10.5.57 The trip generation methodology utilises some of the existing trip rates from the TRAVL database from the previous applications to in order to predict the trip rates for the proposed hotel and health centre.

10.5.58 Trip rates for the Stadium Conference, Tottenham Experience, Sky Walk and Extreme Sports uses are forecast from first principles.

10.5.59 The following annual visitor numbers are forecast:

- Stadium conferencing: 81,180
- Tottenham Experience: 120,000
- Sky Walk 96,600
- Extreme sports 100,000

10.5.60 The current proposal also includes 4,000 sq.m. of flexible community or B1 use. This aspect of the development has been assessed based on B1 use which represents the worst case scenario. This element of the development will not have access to dedicated off street car parking spaces and will have to utilise the 56 pay and display car parking spaces on Worcester Avenue. It is assumed that the proposed office will have up to 250 employees; with trip rates calculated using comparable data from similar uses.

10.5.61 The applicant‘s transport consultant has forecast the trip rates for the residential element of the scheme by comparing data surveys of sites located in Islington on the Holloway Road. Although these sites are in inner London, the Council‘s Transport Officer consider these are acceptable given the high PTAL rating for the site and restricted on-site parking of 0.47 spaces per unit including wheelchair accessible car parking.

10.5.62 The trip generation during the 7am-9am and 4pm-7pm peak periods have been forecast as follows:

- 1,871 two-way person trips during the morning peak (738 in and 1133 out); and
- 2,536 two-way trips during the evening peak periods (1420, in and 1112 out).

10.5.63 Based on the then predicted modal split the previously approved schemes (HGY/2011/2350 and HGY/2011/2351) forecast the following vehicular trip generation:

- 151 in/out trips during the AM peak period; and
- 112 in/out trips during the PM peak period.

10.5.64 Based on the predicted modal split for the current application the following vehicular trips are forecast for the current application:

- 111 in/out trips during the AM peak period; and

- 111 in/out trips during the PM peak period.

10.5.65 The stadium element of the proposal is forecast to generate additional vehicular trips based on conference and other events utilising the stadium car park. The revised TA proposes restricting access to the stadium car park to all but essential conference and event organisers, with all other visitors utilising the 56 shared pay and display car parking spaces on Worcester Avenue. This will suppress the car mode share. The use of the stadium car park on non-event days will be restricted and reviewed by way of a S.106 obligation as part of the parking management plan.

10.5.66 In summary the proposed non event day aspect of the development will have limited car parking provision, with dedicated car parking only provided for the residential and hotel elements of the development. Officers are satisfied that this, combined with the recently implemented all day North Tottenham CPZ, supports the forecast trip generation on non-event day set out in the transport assessment.

10.5.67 In addition evidence provided in the transport assessment demonstrates that there has been a reduction in the annual/ daily traffic flow along Tottenham High Road since 2010. Between 2001 and 2011 there has been a reduction in the average daily traffic flow along the High Road next to the stadium of 18% between, down from 16,708 to 13,583 vehicle movements per day.

Impact on Public Transport

10.5.68 The Transport Assessment forecasts that of the non-event day public transport trips generated by the development:

- 32% of all trips will be via White Hart Lane Station;,
- 13% via Northumberland Park Station;
- 30% via bus to Seven Sisters Station in order to access the Victoria Line; and
- 24% by bus as the main mode.

10.5.69 Officers accept the predicted modal split.

10.5.70 The development will generate some 1377 two way public transport trips over the 3 hour AM peak period and 1,928 two way trip public transport trips over the 3 hour PM peak period. Given the planned improvements to local public transport infrastructure, officers are satisfied that with the predicted distribution of trips the proposed development would not adversely impact on the public transport system.

Cycling

10.5.71 The submitted TA forecasts that cycling will account for some 5.2% of trips during the AM peak period and 3.8% of trips during the PM peak period. Officers however feel that there is potential to increase cycling‘s mode share. The applicant will therefore be required to implement a non-event day cycling strategy to be agreed with the Council. It should consider measures such as visitors‘ cycle parking and changing rooms, showers and lockers for staff. These measures will be reviewed annually as part of the Travel Plan.

Car parking and cycle parking provision

10.5.72 The proposed development includes 270 car parking spaces for up to 585 residential units which equates to 0.47 car parking spaces per unit. This is in line with the 2015 London Plan and Haringey‘s Saved UDP Policy M10. The Council will require 20% of car parking spaces to have electric charging points with a further 20% of spaces capable of being easily fitted with electric charging points.

10.5.73 All wheelchair accessible units will require a disabled parking space. A parking management plan will need to be agreed with the Council.

10.5.74 Cycle parking will be incorporated in to each of the 4 residential towers. The exact number of units and mix will be determined at reserved matters stage. The indicative mix indicates the following:

Tower A will have up to 67 units 261 cycle spaces.
Tower B will have up to 91 units and 127 cycle parking spaces.
Tower C will have up to 231 units and 357 cycle parking spaces.
Tower D will have up to 91 units and 127 cycle parking spaces.

5 x three bed maisonette units on Park Lane will have their own cycle parking provision.

10.5.75 The number of residential cycle parking spaces indicated is in line with the London Plan. However no provision is made for visitor cycle parking. The Council will require details of the numbers and location of visitors‘ cycle parking as part of the Travel Plan.

Hotel and serviced apartments

10.5.76 The proposed hotel will have 180 bedrooms and 49 serviced apartments and 76 car parking spaces. Officers consider the proposed parking provision to be high considering the good public transport accessibility of the site. The London Plan considers that in locations with PTAL of 4-6 parking provision should be limited to operational needs and parking for disabled persons. The applicant will be required to submit a parking management plan, which will limit the use of these car parking spaces for operational use only and should include details on how car

parking will be allocated and managed. 10% of parking spaces will need to be wheelchair accessible. 10% of parking spaces should be provided with electric charging points with a further 10% capable of being easily fitted with charging points. In line with the requirements of the London Plan the applicant will also have to provide cycle parking at 1 space per 20 beds for long stay and 1 space per 50 bed for short stay. These measures will be required as part of the Hotel Travel Plan to be secured by way of a S.106 agreement.

Health Centre

10.5.77 The proposed Health Centre is expected to serve mostly local people. The Transport Assessment predicts that most of the trips generated by this element of the scheme will be by walking, cycling or public transport. No car parking is provided for this element of the scheme. However, the revised highways layout on Worcester Avenue will include 56 pay and display car parking bays, which includes 8 disabled spaces. Officers consider these spaces will be sufficient to serve the car parking needs of the Health Centre. No details of cycle parking have been provided for this element of the scheme. These will have to be secured by way of condition as part of the Travel Plan.

The Tottenham Experience

10.5.78 The Tottenham Experience, which includes the Club shop, museum, cafe, cinema, ticket office and Sky Walk, will not have any dedicated car parking spaces. Visitors will be able to make use of the proposed pay and display car parking spaces on Worcester Avenue. The applicant will be required to provide cycle parking in line with the 2015 London Plan, to be secured as part of the Travel Plan by S.106 agreement.

Conference/ Banqueting and other Stadium non-match day related activities

10.5.79 Parking for these activities will be provided in the stadium car park which has 822 car parking spaces including 90 wheel chair accessible spaces. However, it is proposed that the use of the stadium car park will be restricted to essential visitors only, to reduce travel by car. As part of the car parking management plan to be agreed with the Council, officers will require non-event day car parking within the stadium be restricted to ensure that the 219 in/out vehicular movements during the AM period predicted for the existing planning permission. Officers will therefore agree a cap through the car parking management plan. This cap should not be exceeded except with the agreement of officers, and only if trip generation and junction modelling analysis is provided to demonstrate that a higher percentage of parking allocation can be accommodated on site without impacting on the highways network.

Cumulative impact Assessment

10.5.80 The applicants transport consultant has provided a transport note detailing the cumulative impact of trips generated by the event and non-event day elements of the development.

10.5.81 Events involving more than 10,000 spectators will be classified as major events which will trigger the activation of the Local Area Management Plan (LAMP). Amongst other measures the LAMP will remove the 56 short stay pay and display parking on Worcester Avenue, and place management restrictions on access to the hotel and residential car parks. Officer's are satisfied that measures in the LAMP will be sufficient to manage cumulative vehicular impacts on event days.

10.5.82 Officers are satisfied that there will be no significant cumulative impact on public transport during event days as the majority of events are expected to take place at weekends or weekday evenings outside the peak demand for non-event day related trips. In addition demand is predicted to be in opposite directions with spectators travelling towards the stadium and employees/ visitors travelling away from the stadium. The only element of the proposal that will add to spectator loading on the public transport system are trips related to the proposed residential element of the scheme. However this has been accounted for in the background growth factors which have been included in the event-day assessment.

Road Safety

10.5.83 All the junction improvements proposed as part of the development will be reviewed by Haringey's Highways Team to ensure that the safe movement of pedestrians, cyclists and vehicles is considered at all times. All design proposals will undergo an independent Stage 1 and 2 Road Safety Audit.

Delivery and Servicing and Construction traffic

10.5.84 The supermarket and stadium will share a service access located on Northumberland Park. This access would be used for supermarket and stadium deliveries and refuse collection. This access will be used by rigid vehicles 10 metres long and articulated vehicles up to 16.5 metres long. Swept paths analysis in Drawing BHC-1071 demonstrates that an articulated vehicle can enter and exit the site in a forward gear.

10.5.85 Servicing of the other elements of the development to the south of the stadium will be from Park Lane and Worcester Avenue. The revised highways layout includes service and delivery bays which will be used to service the development to the south.

10.5.86 The developer will be required to provide service and delivery plans for each aspect of the development which seek to coordinate deliveries to each aspect of the development and reduce the number of deliveries to the development as a whole.

Highways Design

10.5.87 The works associated with the completed northern phase of the original NDP scheme (supermarket, THCF offices and university technical college) have been implemented.

10.5.88 In relation to the highways works for the stadium and southern development, the applicant is proposing to revise the layout to include the following:

1. Improvement to pedestrian crossings
2. A new vehicle access to the stadium car park and hotel parking from the High Road.
3. Alternations to the junction of Park Road and the High Road, including improvements to pedestrian facilities.
4. The provision of loading/delivery/waste collection bays on Park Lane and Worcester Avenue for the hotel and residential development.
5. Provision of a taxi rank opposite the hotel. This will be suspended on event days.
6. The junction of Park Lane and Worcester Avenue is modified to accommodate the swept path of the larger outside broadcast vehicles based in the compound on Worcester Avenue.
7. The introduction of hydraulic bollards at each end of Worcester Avenue, to be controlled by the stadium security managers.
8. The introducing of non-match day parking on Worcester Avenue including wheelchair accessible car parking to service the non-match day activities including the new health centre.
9. The construction of two ‗bell mouth' accesses onto Worcester Avenue to access the stadium (basement and ground floor area) and the residential development car parking.

10.5.89 The applicant has also included details of additional improvement to the highways including footways surrounding the site as a part of a cohesive landscaping scheme which includes both private and public highway. The implementation of these works is expected to be carried out in phases throughout the development process (and would need to be secured by condition). A S278 agreement would be required in order for the works to be implemented.

Mitigation

10.5.90 As part of the HGY/2010/1000 application grant funding of £3.5 million was allocated by the GLA to mitigate the local impacts generated by the development with match funding from the Council of £500,000 for works to Worcester Avenue, the funding allocation is as follows:

1. Highways works in relation to Phase 1 (Supermarket, university technical college), £1,160,000, and these works included signalised crossings as the junction of High Road with Northumberland Park and White Hart Lane.

2. Phase 1 and 2 CPZ works £980,000 allocation works are ongoing and works to date include implementation of an all week CPZ around the core of the development, changes to the existing match day CPZ including extending the CPZ to the west and south of the existing match day CPZ boundaries, further work are planned for this and next financial year.

3. Phase 2 Highways (£1,360,000) these works will be implemented to support the increase in the capacity of the stadium. The works include bus priority measures on Northumberland Park, Willoughby Road, Shelbourne Road and Lansdowne Road, improvements to Chestnut Road, new pelican crossings on the High Road, and new crossing point at Park Lane Junction with Shelbourne Road.

4. Worcester Avenue £500,000 for the upgrade of Worcester Avenue post the stadium construction.

10.5.91 The transport assessment prepared by the applicants assesses the impacts of each element of the development on event days (and for a range of events types) and on non event days. The assessment identifies a number of capacity issues within the public transport and road network, and deficiencies in existing highway/transport infrastructure that needs to be addressed by the application. This amounts to a package of measures and restrictions detailed below.

<u>10.5.92 Conditions</u>

- Servicing and delivery plan, further swept path analysis and evidence that articulated vehicles can enter and leave the megastore service yard in forward gear.
- Restrictions on the use of the stadium parking including- team coach drop off area restricted to team coaches;
- Supervision by trained stewards of entry and exit for drop-off;
- A vehicle management plan for the use of the car park;
- All parking to be allocated and restrictions on times of entry and exit;
- Provision of a Construction Management Plan and Construction Logistics plan;

<u>10.5.93 Section 106 obligations</u>

- To achieve the modal split target within the first year of occupation;
- If this is not achieved to implement further measures;

- Provision of a shuttle bus strategy;
- The implementation of the recommendations of the PERS audit prior to occupation of the stadium;
- Submission of a cycling strategy;
- The prioritisation of a proportion of tickets for local residents;
- Funding for the expansion of the CPZ if necessary;
- Operations plans and stewarding plans for Seven Sisters and Tottenham Hale stations in conjunction with TfL;
- Provision of a communication strategy;
- Stewarding of bus stops;
- The provision of match day parking restrictions and road closures and hydraulic bollards; Provision of a residential and commercial travel plan;
- Car club scheme;
- Site parking management plan; Restrictions on eligibility for parking permits;
- The provision of necessary highways works.

Transport conclusion

10.5.93 On reviewing the transport assessment and supporting documentation, officers agree that the development proposal can be adequately accommodated on the Highways and transport network subject to the applicant agreeing to enter into measures set out above to be secured by S.106 obligation and S.278 agreement, and subject to conditions, to help secure the modal split target for the event day activities and to mitigate the impacts of the proposed non-event day activity on the Highway and transport Network.

10.5.94 Officers have reviewed the proposed development‘s impact on the public transport network and have made a number of recommendations to ensure the development proposal does not adversely affect buses, rail and the underground. The review of the operation of the rail stations concluded that spectators will have to queue longer than they currently do. However there is sufficient rail capacity at White Hart Lane and Northumberland Park to deal with the increased demand. Subject to conditions and section 106 agreement the proposal accords with regional and local planning policies.

10.6 ENERGY/SUSTAINABILITY

10.6.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, as well as Policy SP4 of Haringey‘s Core Strategy set out the sustainable objectives in order to tackle climate change. Information is sought regarding how far development proposals meet Carbon reduction targets, District Heating proposals and where sustainability measures such as the use of rainwater harvesting, renewable energy, energy efficiency, etc are included as part of the proposals.

Climate change mitigation

10.6.2 London Plan Policy 5.2 requires major planning applications to attain a 40 per cent carbon dioxide emissions improvement on 2010 Building Regulations Part L, and such major developments should include an energy assessment to demonstrate how the carbon dioxide emissions reduction targets are met.

10.6.3 In line with the energy hierarchy the applicant has modelled energy efficiency savings for the detailed element of the application and this is estimated to achieve a reduction of 5% in regulated carbon dioxide savings compared to Part L of Building Regulations 2013. Given that phase 2 of the application is in outline it is not possible to model these savings at this stage. Further details of how these savings have been calculated has been conditioned to be submitted for the first phase prior to works above ground.

10.6.4 The applicant presented three energy options for the development: option a: connection to a District Wide Heating network; option b: provision of a single energy centre on-site and a site wide network; and option c provision of multiple energy centres on-site and no connection to a site wide network.

10.6.5 The applicant is committed to connecting to a District Wide Heating network if one is delivered in the area. The energy calculations submitted assumes such a connection. The Council and the Club are working with the GLA on bringing this forward. The application does not provide for the District Energy Centre (to serve the District Wide network) on the site. The Club has investigated the possibility of providing for the district energy centre to power the district wide heating network on its site, and this would be the preference of the Council and the GLA, however the design does not allow sufficient space on this tight site.

10.6.6 The Council, with the GLA and DECC, since 2010 has undertaken technical and financial feasibility studies into district energy in North Tottenham. These have shown that North Tottenham should be served by an energy network generating heat and electricity.

10.6.7 These studies highlight that a North Tottenham district energy network could deliver:

- A reduction in the boroughs carbon emissions by nearly 2%;
- An 8% internal rate of return (IRR) on investment over 25 years;
- Heat in an efficient manner through connection to the Eco-Park and use of its waste heat;
- Wider social-economic objectives of regeneration by reducing energy costs for residents (both existing and new);
- Support to developers through connection to a low carbon energy source, helping them achieve required planning targets;

- Local electricity grid support and help deliver the electricity needs of North Tottenham‘s regeneration.

10.6.8 Once the preferred location of the area wide network energy centre is confirmed the details of the network and full costings will be identified. Studies have shown that the area wide centre could be located on the Tottenham Hotspur site, but the constraints of the development currently prevent this. The Council has recently appointed Deloitte to deliver the detailed financial business case. This alongside previous studies will enable capital funding to be secured and to move to project delivery for North Tottenham.

10.6.9 Until the district wide network comes on-line and, in any event, prior to the development of the latter phases of the development Phase 1 of the development (the stadium, the Community Health Centre and the Tottenham Experience) will be connected in a network with a single energy centre situated in the Stadium.

10.6.10 Should the District Network not come forward the site will be linked in a site wide network with a single connection out of the site (option b). Subject to the provisions within policy around feasibility and viability, space has been identified within the residential development for a single energy centre. The application is conditioned such that the multiple energy centres should be decommissioned when the site connects to the District network or to its own single energy centre. The provision of details of the connecting pipework and a single connection to enable connection to the District Network has also been conditioned. The energy strategy does set out a fallback solution of multiple energy centres, operating individually if these options do not come forward (option c). Option c is not in line with London Plan policy and the above conditions prohibit the implementation of this.

10.6.11 Based on the District Wide solution the proposal would achieve a reduction of 17% in carbon dioxide emissions against Part L of Building Regulations 2013, from this stage of the energy hierarchy. If connection to the District network is not possible then the applicant intends to install a 770 kwe gas fired CHP to serve the first phase situated in an energy centre in the stadium, this would form the first phase of any of the options referred to above

10.6.12 The applicant has investigated the use of photovoltaic panels on the stadium and due to its lightweight construction this has not been possible. Whilst this is disappointing this is accepted. Photovoltaic panels are proposed on top of the residential blocks and these generate a 0.5% reduction in carbon emissions.

10.6.13 Overall, taking account of the submitted energy strategy, a 22.5% reduction in carbon emissions is predicted. This falls short of the 35% London Plan target. London Plan policy sets provision for the payment of a carbon-offsetting tariff should the 35% target not be reached. Given that Phase 2 of the scheme is in

outline, and that there is uncertainty with regard to the delivery of the District Network, the submission of a further energy strategy has been conditioned. The level of carbon offsetting tariff due will need to be calculated at this time and it will be payable prior to the occupation of each element of the proposal, subject to viability.

10.6.14 Further information is needed on the cooling demands of the development and the submission of detailed thermal modelling has been conditioned.

10.6.15 Back-up diesel generators are proposed and this approach is acceptable provided they are only for exceptional use and this will be secured in the section 106 agreement. The air quality implications are dealt with below.

Climate change adaptation

10.6.16 Flooding and surface water drainage issues are dealt with in the sections below.

10.6.17 Rainwater harvesting is not proposed for Phase one given the constraints of the design and this is accepted.

10.6.18 The application is conditioned such that water use is managed on the site and water use in the residential towers is limited to 105 litres per person per day.

Conclusion

10.6.19 Subject to conditions and section 106 agreement the proposed climate change mitigation and adaptation strategies are considered to comply with London Plan policy and local planning policies and as such are acceptable.

10.7 DAYLIGHT/SUNLIGHT/ MICROCLIMATE IMPACTS ON RESIDENTIAL AMENITY

10.7.1 Saved UDP Policy UD3 states that development proposals are required to demonstrate that there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking. Similarly London Plan Policy 7.6 requires buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy.

10.7.2 The nearest existing residential properties that would be most affected by the siting and scale of the proposed development are:

3-57 Northumberland Park (odd)
 Burleigh Court

- 19 Bennets Close
- 9-13 Bennets Close
- 50 Northumberland Park
- 52 Northumberland Park
- 2-18 Worcester Avenue (even)
- 1-41 Worcester Avenue (odd)
- Northumberland Park Community School/ Sports Centre/ Resource Base
- St Paul's and All Hallows Infant School
- 28-56 Park Lane (even)
- 1 Lancaster Close
- 2 Lancaster Close
- 3 Lancaster Close
- Concord House
- 2/2a Park Lane
- 2 Vicarage Road
- 28 Bromley Road
- 29 Bromley Road
- 38 Bromley Road
- Coombes House
- 705 High Road
- St Francis De Sales Primary School
- 729 High Road
- 4-18 Bereton Road
- Library/Kathleen Ferrier Court
- 731-805 High Road (odd)
- Bergen/ Brooklyn Apartments
- 809 High Road
- 813-827 High Road
- 820 High Road
- 814 High Road
- 808 High Road
- 806b High Road
- 806 High Road
- 804 High Road
- 794 High Road
- 790 High Road
- 7 White Hart Lane
- 9-39 White Hart Lane
- 8 William Street
- 1 Moselle Street
- Ermine House

Daylight/sunlight

10.7.3 A total of 1589 windows serving 917 rooms within 147 properties have been assessed for daylight and 508 windows within 84 properties for sunlight.

10.7.4 The Applicant has submitted a daylight and sunlight assessment as part of its Environmental Statement. This assesses the impact on daylight through a measure known as "Vertical Sky Component" (VSC) and "No Sky-Line' (NSL).

10.7.5 The BRE guidelines state that:

"if the VSC, with the development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window may appear more gloomy and electric lighting will be needed more of the time".

10.7.6 With regard to applications where there is an extant planning permission on a site, Appendix F2 of the BRE Guide states:

"Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC)…for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.8 times the values for the permitted scheme as benchmarks".

10.7.7 With regard to NSL the BRE Guidelines set out the following:

A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.

10.7.8 Levels of sunlight are measured through an assessment of Annual Probable Sunlight Hours (APSH). With regard to existing surrounding receptors, the BRE Guidelines provide that *a window may be adversely affected if a point at the centre of the window receives for the whole year, less than 25% of the APSH, including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period, and if there is a reduction in total APSH which is greater than 4%.*

10.7.9 The resulting levels of daylight and sunlight as well as the impacts were considered acceptable in planning terms by the local authority for the consented scheme. It should also be noted that a number of properties enjoy a significant benefit due to their proximity to a cleared site and as such this impacts on their score.

10.7.10 Out of the 1589 windows assessed, 1056 (66%) have a baseline VSC equal to or greater than 27% whereas 766 (84%) out of the 917 rooms assessed have a daylight distribution to at least 80% of the total room area. With regard to sunlight out of the 594 windows assessed, 674 (88%) meet the BRE guidelines for sunlight in the baseline.

10.7.11 After the development is constructed out of the total 1589 windows assessed 954 (60%) meet the BRE criteria for VSC whereas 696 (76%) of the 917 rooms assessed meet the criteria for NSL. As such 102 windows are adversely affected in terms of VSC and 70 in terms of NSL.

10.7.12 In regards to daylight, 954 (60%) of the 1589 windows assessed will meet the BRE guidelines for VSC compared to 66% in the baseline whereas 696 (76%) out of the 917 rooms assessed will meet the criteria for NSL compared to 84% in the baseline. 76 properties will experience a negligible effect whereas the remaining 71 properties will experience adverse effects ranging from minor adverse with instances of moderate to major adverse. However, as the room uses for these properties are unknown there is a possibility that many of the windows/rooms expected to experience significant adverse impacts could serve/be bedrooms which are considered less sensitive to daylight conditions and sunlight than living rooms. There is also a possibility that a number of the windows/rooms assessed could also serve/be bathrooms, circulation space, ancillary rooms or commercial which are not considered relevant for assessment for daylight and sunlight as per the BRE.

10.7.13 In regards to sunlight, 432 (85%) out of the 508 windows assessed will meet the BRE guidelines for APSH compared to 96% in the baseline. The likely residual effects would be negligible for 60 properties whereas the remaining 24 properties will experience adverse impacts ranging from minor to moderate adverse. The moderate adverse effect is predicted for the residential terraced properties 11 and 15-41 Worcester Avenue as a result of the close proximity of the properties to the site. As with daylight, the high levels of existing sunlight cannot be expected to be maintained given the aspirations to regenerate the site and surrounding area.

10.7.14 With regard to the extant permission there was a moderate to major effect on sunlight to 31-41 Worcester Avenue and a moderate effect on daylight predicted to Concord House on Park Lane and Kathleen Ferrier Court to the west on the High Road. As such the impact of the new scheme is slightly more than the consented scheme.

10.7.15 It is worth noting that the BRE standards are not policy but are universally recognised guidance which is used in order to determine the acceptability of levels of daylight/sunlight within new development.

10.7.16 It should also be noted however that the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable.

10.7.17 Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. In applying this methodology, the total number of windows which would receive an acceptable level of direct light from the sky increases to 72%.

10.7.18 There is also some impact of loss of daylight and sunlight with regard to a small number of the windows of the surrounding schools, however this impact is not considered to be significant.

10.7.19 Overall, given the location of the site in an urban area, and taking account of the existing site conditions, the proposal is not considered to have a significant impact on local amenity and as such is in line with planning policy.

Overshadowing

10.7.20 The BRE guidelines recommend that at least half of a garden or amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (ie no more than a 20% reduction).

10.7.21 Given the relatively modest height and massing of the existing site there is little overshadowing of the general amenity spaces and surrounding area in the baseline condition on 21 March, 21 June and 21 December.

10.7.22 Some of the areas surrounding the site do however already experience some overshadowing, most notably the playground of St Paul‘s and All Hallows Infant and Junior School, the grounds of Northumberland Park Sports Centre and Community School and residential properties on Worcester Avenue.

10.7.23 The development will give rise to additional overshadowing to the school grounds and playing fields of St Francis De Sales RC Junior School, the Northumberland Park Community School and Sports Centre and St Paul‘s and All Hallows Infant and Junior Schools. Overshadowing will be brief and will pass quickly. There will also be some additional overshadowing to some of the private gardens to Worcester Avenue. The Environmental Statement describes the increased overshadowing on 21 December, ie the worst case as the shadows are longer, as minor to moderation adverse significance. Although the proposed development does increase the overshadowing this is not in the round considered to be significant and therefore is acceptable.

Solar glare

10.7.24 In regards to solar glare the majority of the viewpoints will experience negligible to minor adverse effects. There is one instance of a moderate adverse effect. The instances of reflection identified will likely be brief in nature and do not obstruct a driver‘s line of sight or a view of any traffic signals. These are not considered to be material and as such the proposal is considered to be acceptable and in line with policy

Wind mitigation

10.7.25 With the introduction of proposed landscaping and wind mitigation, all locations in and around the site are considered suitable in terms of pedestrian safety, throughout the year and for all phases of construction.

10.7.26 While the majority of locations are considered comfortable for the intended use with the introduction of proposed landscaping and wind mitigation, there are some areas that remain unsuitable in terms of pedestrian comfort during the various construction stages and for the completed project. This is a change from the extant permission.

10.7.27 Given the location of these areas and that they are only intended for passing through this is considered acceptable in this instance and as such the proposal is acceptable and in line with policy in this regard.

Light pollution

10.7.28 New street lighting is proposed to the High Road, Park Lane and Worcester Avenue together with lighting for the podium, surrounding trees, floodlights for the stadium, and architectural lighting within the Stadium skin. All of this lighting has been designed to avoid light spill as far as possible. Some brightening of the sky portion above the stadium is typical of sports installations when the floodlighting is in use and the applicant sets out that the resulting brightness is likely to be in line with other stadia of a similar nature.

10.7.29 Submission of an architectural lighting strategy and event day lighting strategy for approval by the Local Planning Authority is conditioned. On this basis the proposal is in line with policy and is considered acceptable.

Overall conclusion on impact on amenity

10.7.30 London Plan and Local planning policies set out that there should be no significant impact on local amenity. Taking account of the technical studies submitted in the environmental statement and the urban setting of the site and its current

condition the proposal is not considered to have a significant impact on local amenity and as such is in line with planning policy.

10.8 DRAINAGE/FLOOD RISK

10.8.1 Local Plan Policy SP5 and London Plan Policy 5.12 seek to address current and future flood issues and minimise risks in a sustainable and cost effective way. London Plan Policy 5.13 sets out the drainage hierarchy for Sustainable Drainage Systems (SUDS) so greenfield run-off rates are achieved and that surface water run-off is managed as close to its source as possible:

1. store rainwater for later use;
2. use infiltration techniques, such as porous surfaces in non-clay areas;
3. attenuate rainwater in ponds or open water features for gradual release;
4. attenuate rainwater by storing in tanks or sealed water features for gradual release;
5. discharge rainwater direct to a watercourse;
6. discharge rainwater to a surface water sewer/drain; and
7. discharge rainwater to the combined sewer

10.8.2 In line with the NPPF Local Plan policy SP5: ‗Water Management and Flooding' sets out the Council's requirement that all development in Haringey to where necessary mitigate flood risk and employ sustainable drainage systems. Policy DM35: ‗Managing and Reducing Flood Risk' and DM37: ‗Sustainable Drainage Systems' of the emerging Development Management Policies DPD set out in more detail how flood risk and sustainable drainage should be dealt with in planning applications. The site is located predominantly within Flood Zone 1 with a small portion of the site within Flood Zone 2.

10.8.3 The site is also generally free from surface water flooding, although a significant stretch of the A10 Tottenham High Road adjacent to the site is shown to be at risk from surface water flooding. The proposed scheme introduces on site measures to retain surface water within the site, and as a result it is predicted that run off from the site onto the A10 will be reduced.

10.8.4 The Supplemental Drainage Report dated 9 November confirms the following sustainable drainage measures will be employed within the scheme:

- Permeable paving of all external areas of public realm.
- Surface water storage within the sub-base of public ream areas.
- The moveable pitch will retain water within a permeable layer beneath the surface.
- The artificial surface beneath the moveable grass pitch will be also be permeable with surface water storage below the surface.
- Stadium roof will be drained into attenuation tanks within the stadium

basement.

- Green roofs on the residential buildings.
- Attenuation tanks within the structure of buildings –to minimise the need for basement storage tanks that necessitate pumping.

10.8.5 The Council‘s Senior Drainage Engineer is satisfied that the applicant has optimised sustainable drainage measures given the constraints of the site. The new proposal will achieve the brownfield discharge rates previously agreed with the LPA as part of the existing planning permission for the site.

10.8.6 The Council‘s Senior Drainage Engineer notes that pumping would still be included, which is not a preferred solution, however accepts that given the constraints of the site, and the nature of the scheme, some element of pumping cannot be avoided. The applicant‘s consultant has demonstrated concepts that would minimise the need for pumping, The Council‘s Senior Drainage Engineer advises that these concepts should be explored at the detailed design stage as the various components of the drainage strategy come forward.

10.8.7 In conclusion the application and information submitted is acceptable and in accordance with planning policy subject to the inclusion of the following conditions:

1. Further details of drainage proposals to be approved as the scheme is developed.

2. Completion and Maintenance of the agreed Sustainable Drainage Strategy.

10.9 AIR QUALITY AND CONTAMINATED LAND

10.9.1 The London Plan, Policy 7.14 states that new development should: minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least air quality neutral‘ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs).Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

10.9.2 UDP saved policy UD3 sets out that:”The Council will require development proposals to demonstrate that:

a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

10.9.3 Saved Policy ENV1 and draft DM Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.

10.9.4 The applicant has submitted a Contaminated Land Assessment, The Council‘s Environmental Health Pollution Officer raises no objections subject to conditions.

10.9.5 The application site is adjacent to a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government‘s air quality objectives for nitrogen dioxide (NO2) and PM2.5. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMA and is committed to being a ‗Cleaner Air Borough‘ and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new exposure adjacent this major arterial route into London, the proposed residential units are located away from the High Road, adjacent to the Park Lane / Worcester Avenue corner.

10.9.6 An air quality assessment (Air Quality Consultants, August 2015, ref: J2299) has been submitted along with the planning application to assess the air pollution impact of the proposed developments.

10.9.7 The main air polluting operations associated with the entire site include 1224 car parking spaces and associated traffic movements, 13.5MW gas powered boilers and 4.5 MW diesel generators; assessed during peak periods of stadium use. The diesel generators were originally proposed to be used as a primary source of power on match days and event days, for which the air quality assessment has determined would have an adverse impact on air quality in the local area.

10.9.8 The London Plan, Policy 7.14 states that new development should: ‗minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least ‗air quality neutral‘ and not lead to further deterioration of

existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs). Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

10.9.9 The initial proposal for the use of polluting diesel powered generators as a primary power source was unsatisfactory and discouraging; especially in the light of the work being carried out towards improving air quality. Following discussions with the applicant additional information has been submitted specifically with regard to air quality and the use of the diesel generators. The ‗Regulation 22 – Further Environmental Information' submitted (November 2015) states … *diesel generators will only be used for emergency backup generators on match day and will comply conform to the US Tier 3 (EU Stage IIIA). It is considered this will have a minimal impact on air quality on local receptors and remove the adverse impact to that of negligible*"….

10.9.10 Further information has been submitted via an AQ Note (Air Quality Consultants, November 2015). Section 3.1 of the AQ Note states ‗*THFC have committed to connecting to the UK Power Network (UKPN) for match day primary power provision, with no onsite power generation for match days*". Further affirming that onsite power generation by diesel would only occur during emergency situations and that the generators will operate a maintenance schedule of a maximum of 1 hour per week (52 hours per year). The air quality impact will therefore be significantly reduced.

10.9.11 The aspiration is that in future the site will connect to a District Energy Network (DEN). However should this connection not be forthcoming then there will be a site-wide energy centre, operating gas fired CHP subject to feasibility and viability.

10.9.12 This is also confirmed by the Energy Strategy Clarification Note additional information (6th November 2015 Buro-Happold Engineering);
‗*2.3 The indicative phasing plan for the Development anticipates that the stadium, the Tottenham Experience and the community health centre will form the first phase of development and should be operational in 2018. It is understood that the North Tottenham DEN will not be delivered by 2018 and there is a requirement therefore that the first phase of the Development will need its own energy source. The application proposes that these uses will be served by an energy centre to serve all the buildings in this phase, which in effect will function as a site-wide energy centre for phase one. The energy centre will be located within the stadium building and will be supplied from high efficiency gas fired boilers*.'

10.9.13 And *„2.5 If the DEN is not operational in time for the delivery of these remaining elements of the Development, then in order to retain flexibility in terms of the timing, and sequence of these buildings coming forward, the application*

proposals make provision for each to meet their own energy requirements (probable interim gas boiler solution) pending connection to the proposed DEN. The solution will be developed to allow for a site-wide network to be connected to the DEN once operational."

10.9.14 The proposal complies with policy subject to the imposition of conditions covering the following:

- Limiting the operation of the stadium until UK Power is capable of supplying the electricity needed for all events.
- Limiting the use of Diesel generators to emergency use only.
- Securing the use of high standard Diesel boilers and the use of ultra low sulphur fuel.
- Securing the specification of CHP boilers and flues
- Securing the submission of a Dust Management Plan

10.10 NOISE

10.10.1 The National Planning Policy Framework states that Planning policies and decisions should aim to:

a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development

b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions:

c) recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established: and

d) identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

10.10.2 The London Plan 2011 (as amended) sets out planning policies, strategies, and guidance at national and regional level. Policy 7.15 states, development proposals should seek to manage noise by:

a) avoiding significant adverse noise impacts on health and quality of life as a result of new development;
b) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business;
c) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);

d) separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout — in preference to sole reliance on sound insulation;
e) where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
f) having particular regard to the impact of aviation noise on noise sensitive development;
g) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

10.10.3 UDP saved policy UD3 sets out that: –The Council will require development proposals to demonstrate that:
a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

10.10.4 The Draft DM DPD sets out the following:

Policy DM23 Environmental Protection - Noise and Vibration

A. The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Potentially noisy developments may be refused if it cannot be suitably demonstrated that measures will be implemented to mitigate its impact.

B. A noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise.

10.10.5 World Health Organisation Community Guidelines (WHO, 1999) provide guideline values for community noise in specific environments. For outdoor living areas, the noise guideline value for ‗serious annoyance, daytime and evening' (07.00-23.00 hours) is 55 dBLAeql 6hour, and for ‗moderate annoyance, daytime and evening' 50 dh6BoLAuerq.l The level of noise outside bedrooms at night (23.00-07.00 hours) that is likely to result in sleep disturbance with the window open (outdoor values) is 45 dh8BoLuAreq, and or night time impulsive noise levels of 60dB LAmax. For inside, indoor living areas, the WHO noise guideline value for ‗speech intelligibility and moderate annoyance, daytime and evening' is 35 dh6BoLuAreq. For inside bedrooms, the noise guideline value for ‗sleep disturbance, night-time' is 30 dh8BoLAuerq or 45dB LAmax.

10.10.6 The applicant submitted a noise assessment with its application. The Report identifies that noise emanating from the construction and operational use of the proposed development is likely to have an adverse aural impact on local residents and future residents and, may give rise to complaints of noise nuisance, prior to mitigation measures being implemented. The nearest existing residential properties to the site are located 20m away although the majority are more than 30m away.

10.10.7 The development will take 6-7 years to construct, with construction work proposed for 12 hour working days, 6 days a week, at noise levels which are assessed as significant.

10.10.8 No specific information regarding the proposed plant types and locations has been provided. Proposed fixed plant noise limits are derived from historic baseline noise data from 2008. Operational noise is likely to be audible at the façade of residential properties. Operating fixed plant at night time, at 45 dr8BLA eq is likely to cause sleep disturbance, with windows open.

10.10.9 The Report states the increased level of operational road traffic noise is assessed as insignificant, so no specific noise mitigation measures are necessary.

10.10.10 Football event noise is predicted to increase by 0.4dB, compared to the extant planning permission. This is likely to be an imperceptible change, so no additional noise mitigation measures are considered necessary.

10.10.11 For music events, which rely on the use of high powered amplification, Acoustic Conditions attached to a Premises Licence should reflect guidance provided in the Noise Council‘s Code of Practice on Environmental Noise Control at Concerts published by the UK Noise Council in 1995 (CoP). The CoP is designed to assist both LA‘s and event organisers, giving guidance on the prevention of public nuisance, setting _Music NoiseLevels‘ (MNLs) for the event, and procedures for dealing with noise complaints.

10.10.12 The CoP states, for urban stadia or arenas where 3 concert days are proposed per calendar year MNLs _should not exceed 75dB(A) over a 15 minute period.‘

10.10.13 For all venues where 4-12 concert days are proposed per calendar year, the CoP states, MNLs _should not exceed the background noise level by more than l5dB(A) over a 15 minute period‘.

10.10.14 The Council had the noise assessment independently assessed by Sanctum consultants and its findings are set out in the following paragraphs:

Construction noise

10.10.15 It confirms that the methodology used for the prediction of construction noise is in accordance with industry standards. The total construction period of six years is based on 12 hour working days, seven days a week. If construction was to be limited to the usual working hours 8 am to 6pm Monday to Friday and 8am to 1pm Saturdays the construction period would be increased by a year. The noise assessment does indicate some moderate negative/significant noise during some construction activities however for the most part the noise will be moderate negative/significant. Sanctum consider that the application should be conditioned to conventional hours. However, Officers consider that longer working hours are considered to be pragmatic in this instance given that this will shorten the time of construction overall. The submission of a Construction Environmental Management Plan is conditioned as this will set out that works outside the stadium shell will not be permitted after 6pm on weekdays and Saturdays after 1pm.

Road traffic noise

10.10.16 As the increased level of operational road traffic noise is assessed as insignificant, no specific noise mitigation measures are considered necessary.

Operational plant noise

10.10.17 Sanctum has confirmed that the appropriate methodology has been used for the prediction of operational noise from fixed mechanical plant and equipment. Sanctum set out that operational noise is likely to be audible at the facade of residential properties. The submission of a noise management plan including details of operational plant in each phase shall be submitted. This plan shall set out how noise has been minimised and the mitigation proposed.

Football and NFL match noise

10.10.18 Sanctum confirm that noise from Football matches and NfL matches are likely to be similiar to the current noise experienced and the impact is therefore acceptable. Details of the Public Address system are conditioned.

Music concert noise

10.10.19 With regard to concerts, given that 6 music concerts are proposed, the proposal does not meet the COP 1995 guidelines. Sanctum suggest that the Council may wish to limit the noise to a 15 decibel increase. Officers are of the view that given the economic benefits of the concerts that this is not a reasonable approach particularly given that this is an existing stadium. The application is conditioned such that prior to the occupation of the stadium for music concerts, a noise control plan shall be submitted to the Council including details of the mitigation

measures included within Section 13.6 of the NDP Environmental Statement. The noise generated from music concerts must not exceed 75dB LAeq.

Impact on proposed residential development

10.10.20 Sanctum has confirmed that the site's suitability for residential assessment has been assessed correctly. The assessment concludes that to reach WHO internal target values windows to the proposed residential towers should normally be kept closed and they will need to be fitted with mechanical ventilation. This matter will be dealt with at Reserved Matters stage.

10.11 ECOLOGY

10.11.1 Policies 2.18 and 7.19 of the London plan contain positive obligations on development to safeguard ecological interests within development proposals, and to contribute to the development of a green grid. Policy 7.21 meanwhile seeks to retain where possible, existing trees and flora and promotes additional tree planting where appropriate.

10.11.2 Policy SP11: of the Haringey Strategic Polices DPD (2013) indicates that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall… Promote high quality landscaping on and off site, including improvements to existing streets and public spaces. Policy SP13 meanwhile seeks to protect all development shall protect and improve sites of biodiversity and nature conservation, including private gardens. The saved polices UD3, ENV7 and OS17 within the Haringey Unitary Development Plan reflect these policy provisions.

10.11.3 The Environmental Statement provides an update on the earlier investigations associated with the previous planning permission. The ecological value of the site has previously been investigated and consistent with a substantial level of change, including the implementation of the previous planning permission, the existing site is not the subject of any specific ecological designations. As part of the earlier assessment, the applicants undertook a Bat and Nesting Birds survey, and an extended phase 1 habitats assessment. These surveys were repeated through 2015 and the findings assessed in accordance with established databases (such as GiGL) and appropriate guidelines. The assessment considered the cumulative effects of the proposed development alongside other proposals.

10.11.4 There are two internationally important designations are present within 10km of the Project Site: Lee Valley Ramsar and Special Protection Area (SPA); and Epping Forest Special Area of Conservation (SAC). Two nationally important designations are present within 3km of the Project Site: Walthamstow Reservoirs

Site of Special Scientific Interest (SSSI); and Chingford Reservoirs SSSI. No locally important sites occur within 3km of the site boundary.

10.11.5 The desk-based information search provided by GiGL highlights the presence of two non-statutory Sites of Importance for Nature Conservation (SINCs) located within the data search area. These sites Tottenham Cemetery and Tottenham Hale to Northumberland Park Railsides are identified by the Greater London Authority on account of their flora and fauna and are graded on the basis of their importance to a particular defined geographic area in the following order of importance

10.11.6 Given the site conditions, the assessments found no distinctive vegetation or flora. Instead, the only value of the habitats on site was considered be to bats and birds. The assessment therefore focused on these two areas with two more detailed surveys. The bats survey found little evidence of activity on the site and the timing and frequency of recorded bat activity led the consultants used to conclude that bats were not roosting on the site or that they rely on the site for foraging.

10.11.7 In respect of nesting birds, the surveys undertaken highlight a pair of kestrels (amber-listed Bird of Conservation Concern (BoCC); London Species of Conservation Concern (LSCC)) nesting in the lower rear half of the north stand monitor screen. A pair of starlings (red-listed BoCC; UK & London BAP Priority Species; LSCC) was also recorded nesting above a doorway into the stadium, beneath a concrete ledge. The study concludes that whilst these species are of conservation concern, particularly in London, the site is not any more significant than any others in the locality such that the impact upon these recorded species will be limited.

10.11.8 The assessment also considers the scope of the developments tall structures to create an increased risk of bird strikes. This, the report indicates, takes place where large expanses of glass are proposed – particularly at night. The assessment concludes that the proposed buildings because of their design and form, do not exhibit such characteristics so as to pose a significant risk to birds.

10.11.9 Overall the ecological assessment identifies no significant risks to VEWR‘s as a result of the development. The proposed addition of green roofs to several buildings is, instead, considered to amount to a positive habitat gains in line with guidance within the NPPF, London Plan Policy 7.19, Haringey Policy SP13 and the UK, London and Haringey BAPs. Subject therefore to demolition works having regard to bird nesting times, and the contractor fulfilling the obligations contained in the appropriate legislation, the proposals are not considered to require any specific forms of mitigation. Officers accept this conclusion and accordingly consider that the proposals satisfy the requirements of polices.

10.12 ENVIRONMENTAL IMPACT ASSESSMENT

10.12.1 The proposed development falls within the category of developments specified at Section 10(b), Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.

10.12.2 As the proposed development is likely to have significant effects on the environment, it is required to be subject to an Environmental Impact Assessment (EIA) before planning permission is granted. Regulation 3 of the EIA Regulations 2011 prohibits the grant of planning permission unless prior to doing so, the Council has taken the ‗environmental information' into account. The environmental information comprises the applicant's original Environmental Statement (ES), any further information submitted following request under Regulation 22 of the EIA Regulations 2011, any other substantive information relating to the ES provided by the applicant and any representations received from consultation bodies or duly made by any person about the environmental effects of the development.

10.12.3 The applicant subsequently provided additionalr documentation and addendum to the ES, as clarifications which was consulted upon by letter, site and newspaper notice and the 21 day consultation period expired on 4 December 2014.

10.13 EQUALITIES

10.13.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and good relations between persons of different equalities groups.

10.13.2 The planning application will involve complete redevelopment of the stadium and the external refurbishment of listed and heritage buildings. The proposals engage primarily with protected characteristics around access and have been designed to contemporary Building Regulations and the Guidelines for Accessible Stadia. The replacement of the existing stadium building with a new fully accessible stadium is considered to have a positive benefit for visitors with physical impairment attending the sporting and other activities taking place on the site. Subject to conditions requiring the maintenance and operation of the lifts to the podium, the external spaces across the site are considered to provide equal access to all. The proposals are not considered to give rise to any differential impacts upon protected characteristics. The proposals are accordingly considered by officers to contribute to the elimination of barriers to access by those with physical impairment consistent with the promotion of the equalities

duties, Members must have regard to these obligations in taking a decision on this application.

10.14 CONCLUSION

10.14.1 It is necessary to start by reaching a conclusion on the heritage impacts of the proposed development before turning to the overall planning balance. Considerable weight must be given to the preservation of the settings of listed buildings and conservation areas in planning decisions as set out in both statute and the NPPF. Decision makers must consciously acknowledge any harm arising and then attach ‗considerable weight' to it, and only then assess whether there are circumstances that outweigh the harm identified that allow permission to be granted. There is therefore a statutory presumption in favour of refusal if harm is present.

10.14.2 As is explained above there are a number of impacts on heritage assets. In terms of designated assets (i.e. listed building and conservation areas) the conclusion of the Conservation Officer, as set out above is that there is substantial harm to the settings of Warmington House and the setting of the conservation areas, as well as the demolition of the three locally listed buildings. The heritage officer's assessment is that in heritage terms that harm is not offset or made up by the heritage benefits of the proposal.

10.14.3 The test in para 133 of the NPPF is that where there is substantial harm to a designated asset this should only be allowed where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.

10.14.4 In terms of the demolition of the non-listed buildings, and the consequential impact on the setting of Warmington House, the justification put forward by the Applicant is that of crowd safety on match days. The officers have carefully scrutinised the report produced by the Applicant, and had it independently assessed. The officers' view is that its conclusions should be accepted. There is no sensible and effective way of ensuring crowd safety, and keeping the High Road open, other than the demolition of the non-listed buildings. The views of Historic England are noted, but with respect to them they are not crowd safety experts and they do not produce any supporting material for their view that the buildings can be retained and safety ensured. It is therefore officers' view that the test in para 133 is met and that the harm is necessary in order to achieve substantial public benefits with regard to the loss of the three locally listed buildings.

10.14.5 It is also the heritage officer‘s view that there is substantial harm to Warmington House, from the creation of the new terrace, including the Tottenham Experience. This is a fine judgment, and members will have to consider the degree of harm caused. However, even accepting that there is substantial harm in this particular respect, it is the officers‘ opinion that given the overall benefits of the terrace leading to the stadium, and the integrated and holistic design of this part of the scheme, the harm is necessary and the substantial public benefits outweigh the harm to heritage assets in respect of this part of the scheme.

10.14.6 The hotel element of the development is also considered to cause substantial harm to the Listed Building‘s setting and the Conservation Area as is the Tottenham Experience building. Given the substantial public benefit of the hotel, and its impact on economic regeneration of the area and levels of employment, this is considered necessary to deliver the substantial benefits of the scheme. The Tottenham Experience is considered an integral part of the stadium offer and as such is considered to be necessary to deliver the public benefits of the scheme. Therefore although the substantial harm to the Listed Building and its setting, and the setting of the Conservation Areas is acknowledged, this is outweighed by the major public benefits of the development. In order to achieve these benefits the harm to heritage assets is necessary.

10.14.7 The less than substantial harm caused by the residential towers and the development as a whole to surrounding designated and non-designated assets has also been given considerable weight however the substantial public benefits of the scheme are considered to outweigh this harm. In terms of the overall balance, this is a proposal that carries enormous benefits for North Tottenham in terms of jobs, economic activity and a range of new uses. An estimated 890 construction jobs, an estimated 820-1030 additional jobs (range depends if community use or office use) and an estimated at least £19.45 million contribution to the local economy per year are predicted.

10.14.8 The principle of redevelopment of the Stadium is strongly supported in policy, as are the uses closely associated to it, e.g. the Tottenham Experience. The Extreme Sports centre should become an important facility for the area and the community, particularly for young people. The housing development will create a large number of new dwellings in the area, and widen the range of housing mix. The hotel creates a large number of jobs, as well as being part of the overall transformational nature of the development for the area. The project also involves a large amount of public space which will be provided to a very high standard and will then be available to the community. As is envisaged in the Local Plan, AAP and the OAPF designation, the entire development will have a major regenerational effect in the area.

10.14.9 In summary the Development is of high quality, with the potential to be considered iconic, it delivers substantial public benefits which will regenerate the

area and act as a catalyst for wider regeneration, the heritage harm is necessary to deliver these public benefits and these benefits outweigh this harm. The development is considered to be in accordance with Development Plan policies. None of the other material considerations outweigh the policy support for the development.

10.14.10 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above.

10.14.11 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above.

The details of the decision are set out in the RECOMMENDATION

44 White Hart Lane

11 MATERIAL CONSIDERATIONS (HGY/2015/3002)

11.1 Principle of development

11.1.1 London Plan policy 5.17 Waste Capacity sets out in point H that if for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.

11.1.2 The site is safeguarded as a waste site in the draft Site Allocations document and the site is also part of the wider site allocation for High Road West (NT5) in the draft Tottenham AAP.

11.1.3 The licensed waste capacity (tonnes/annum) for 44 White Hart Lane is 74,999 tonnes. The last use was as a metal recycling site (vehicle dismantler).

11.1.4 The site was until recently in use as a car breakers. Officers understand that Redcorn, the previous occupant, has implemented a phased relocation of all of its operations away from the application site to a site in Brantwood Road site since 2012. Although the proposal was advertised as a departure from the development plan, after consideration of the application and the material considerations the proposal is considered to be in accordance with the development plan.

11.1.5 The principle of an alternative use of the application site for non-waste use is in accordance with development plan policy because the previous waste-handling capacity of the application site has been transferred. In addition the use proposed is only temporary and, following the cessation of the temporary use of the site,

will be available for redevelopment in accordance with site allocation NT5 or to be returned to waste use subject to the outcome of the North London Waste Plan.

11.1.6 The height of the portacabins and the aggregate pile are conditioned and are not considered to impact on residential amenity.

11.1.7 As such the principle of the use of this waste site as a temporary construction compound is acceptable subject to the material considerations of traffic impact, air quality and noise being dealt with satisfactorily and these considerations are set out below.

11.2 Air quality

11.2.1 The London Plan, Policy 7.14 states that new development should: ‗minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least ‗air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs).Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

11.2.2 UDP saved policy UD3 sets out that:"The Council will require development proposals to demonstrate that:
a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

11.2.3 Policy DM23 Environmental Protection- Air Quality

C. All development should be designed to:
   a. Improve or mitigate its impact on air quality in the Borough; and
   b. Improve or mitigate its impact on air quality for the occupant of the building or users of the development.

D. Air quality assessments will be required for all major development and other development proposals, where appropriate.

E. Where adequate mitigation is not provided planning permission will be refused.

11.2.4 The site is adjacent to a main road of air pollution concern-White Hart Lane. The White Hart Lane / High Road junction area has exceedences of the Government's air quality objectives for nitrogen dioxide (NO2). The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents.

11.2.5 An air quality assessment (Air Quality Consultants, September 2015, ref: J2357/1/D1) has been submitted along with the planning application to assess the air pollution impact of the 'construction compound'. The main air polluting operations include 41 HGV movements and dust from the delivery of aggregates. The air quality assessment has determined that the HGV movements will have an adverse impact on air quality in the immediate local area. The following assertions have been made:

- The compound is to be 'temporary' until 2018, and so assessment of air quality neutrality is not necessary.
- There will be no requirement for demolition, earthworks or construction at the proposed development site.
- All plant are understood to be 'mobile', with no permanent structural work required.
- There will be no unpaved ground at the site.
- The concrete batching facility will use only electric-powered plant, with no diesel or gas-fired fixed plant utilised in the batching process.

11.2.6 The Council's Environmental Health Officer does not object to the application subject to conditions covering the following:

- HGV's should be covered
- Means of construction of internal roads
- Measures to reduce dust
- The issuing of an Environmental permit
- An inventory of equipment and machinery
- Scheme for disposal of foul and surface water and concrete waste water approved by the Local Planning Authority
- Hours of operation limited to 7am-6pm weekdays and 8am and 1pm Saturday and no work on Sundays and Bank Holidays
- No more than 20 lorries, including those associated with the concrete batching plant, shall enter the transfer site in any one day and no more than 20 lorries, including those associated with the concrete batching plant, shall leave the transfer site in any one day. In any one week, no more than 110 lorries shall leave the transfer site

11.2.7 All these conditions are included on the draft decision notice save for the condition limiting movements to 20 lorries and the hours of operation. Given the transport solution suggested below this condition is not felt to be necessary. Given the need to minimise the length of construction on the stadium site Planning Officers consider that it is reasonable for the hours of operation to be 7am until 7pm Monday to Saturday.

11.3 Transport impact

11.3.1 The proposal site is located off White Hart Lane some 160 meters from the junction with the High Road and Northumberland Park; the site was previously used as a car breakage and recycling facility which involved vehicles being transported to the site by recovery vehicles and car transporters. The vehicles were stripped crushed and the materials transferred from the site to be recycled. There were also a number of small car repair and tyre fitter garages located on the site, which generated some traffic. The applicant‘s transport consultant has not provided any trip generation or distribution information in relation to the previous use of the site, however, this site would have generated some traffic via White Hart Lane and in particular the junction of White Hart Lane with the junction of High Road N17 as part of it‘s daily operation.

11.3.2 This section of White Hart Lane has eastbound queuing traffic during the AM, PM and Saturday inter peak. The traffic modelling completed in 2012 to support Phase 1 of the NDP development forecasted that post the construction of the supermarket, the junction will have a maximum degree of saturation of 84% during the AM peak hour, 88% during the PM peak hour and 89% during the Saturday inter peak with a maximum of 12 vehicles queuing after the green. It is to be noted that the forecasted degree of saturation is as a result of the predicted trips from the supermarket development and the proposed increase in background growth assumed as part of the forecasted development year 2015/16. The applicant‘s transport consultant has completed traffic surveys as part of the 2015 planning application. The results of the surveys concluded that the traffic volumes on the highways network in and around the site have decreased. The evidence provided demonstrates that there has been a reduction in the annual/ daily flow of traffic on the highways network since 2010; with a reduction in the annual average day flow next to the stadium of 18% between 2001 and 2011 (16,708 to 13,583).

11.3.3 The applicant has been granted planning permission for the construction of a 56,250 capacity stadium as part of planning permission HGY/2010/1000. As part of this application a Construction Management Plan was submitted, which was approved as part of the application. The Construction Management Plan included phased construction of all three phases of the development including the stadium. Due to various reasons the forecasted phasing of the development has been delayed; to date the construction activities have included the construction of

the northern development including associated highways works, and earth works for the stadium. The scale of the development has changed with the increase in the size of the stadium and southern development hence the applicant will be required to produce a revised construction management plan which will be secured as part of the new stadium and southern development application.

11.3.4 In relation to this application the applicant is proposing to provide a temporary construction compound which includes the manufacturing of concrete for the construction of the stadium only. During the excavation to construct the basement of the stadium large gravel deposits were found which is sufficient to implement the ground works and produce the concrete required to construct the stadium. This changes the dynamics of the supply chain for the delivery of concrete to construct the stadium; as instead of delivery of concrete via the A406, the concrete will be manufactured locally. This will reduce the length of the supply chain and reduce the number of vehicle miles that the concrete will have to travel to the site.

11.3.5 The approved Construction Management Plan as part of planning application HGY/2010/1000 includes forecasted trip movements in relation to the construction of the new stadium. The movements were based on 23 days per month and a working day of 8.5 hours, with vehicles evenly spread throughout the day. The ready mix concrete delivery was forecasted to take place between Dec-11 to Sept-12 with 8000 trips over an 8 month duration which equated to 1,000 trips per month. This would represent a maximum demand of 44 trips per day over this period. Based on an 8.5 hour day this would have equated to 5 trips per hour or 1 trip over 12 minutes.

11.3.6 The new concrete supply chain will include aggregate transferred to the 44 White Hart Lane site from the NDP site, the delivery of cement and sand to the site, water will be from the mains, the concrete trucks will be loaded with the concrete which will then be transferred to the NDP site. The applicant has forecasted that on an average day the proposed facility will have an average of 29 trips in each direction over an 8.5 hour period between the construction compound and the High Road. We have considered that although this is the average daily forecasted trip generation, we have considered a sensitivity test which considers the worst case scenario on the highways network. This is based on the maximum amount of concrete the site can actually use in the peak of the construction, which is some 400 cubic meters per day (8.5 hour day) with each concrete mixer assumed to be fully loaded with 8.5 cubic meters of concrete. This will produce 47 trips in each direction over the day, this equates to 3 more trips per day when compared to the previously approved construction management plan. Based on an 8.5 hour day this would equate to 5.5 (6) trips per hour in each direction 1 trip every 10 minutes in each direction. The difference between this proposal and the approved Construction Management Plan is that the trips will be distributed via White Hart Lane, with cement trucks

turning left out of the site then turning right onto the High Road and then left into the site. The reverse journey will see trucks turning right out of the site left into White Hart Lane and then right into 44 White Hart Lane. We have considered that the critical movement which may potentially impact on the operation of the junction is the right turning movements out of White Hart Lane into the High Road travelling east and on the returning journey travelling west the right turn out of the NDP site and the right turn into the 44 White Hart Lane construction compound.

11.3.7 We have reviewed the potential impact of these movements on the highways network as follows:

(a) Travelling East: The right turn at the junction of White Hart Lane/ High Road, this junction is signalised with a right turn filter, which facilitates the right turning movements, this junction has recently been reconfigured as part of the implementation of the Northern Development, as part of the process TRANSYT modelling (Version 9) for the junction was approved by Transport for London (TfL), the results of the modelling concluded that the right turn had a high degree of saturation however the junction is operating within acceptable parameters. The traffic flows used in the traffic model were based on a fully operating superstore and the assumed background flows were higher than those surveyed above. As above the background flows have actually decreased over the last 10 years by 18%, in addition the traffic flow forecasted to be generated by the superstore have not materialised to date and are unlikely to in the next 2 years whilst this compound is in operation. In addition at a recently conducted site visit it was observed that the junction is operating within acceptable parameters with one exception, caused by the location of the W3 bus stop some 60 metres from the junction with White Hart Lane with the High Road which means that when eastbound buses stop cars cannot pass to utilise the green ahead and green right at the junction. This result in underutilised green time at the junction every 3-5 minutes and a slight increase in the queuing traffic. Our highways engineers have proposed relocating the bus stop approximately 25 metres to the west, this allows cars to pass parked buses and utilise the green ahead and green right at the junction. We have considered that with the above mitigation which improves the operation of the junction the proposed maximum increase of 1 additional HGV trip every 10 minutes can be accommodated without impacting on the operation of the junction. Aggregate, sand and cement will be stockpiled on site and the deliveries will be conditioned to take place outside the peak operational period of the highways network, AM peak, PM peak, and Saturday peak.

(b) Travelling West: The right turn out of the NDP site will be controlled by construction traffic marshalls and will not significantly impact on the operation of the highways network as above; the increase in trips is only some 3 additional cement vehicles than was previously approved.

(c) Right turn into the site Construction Compound: We have considered that in order to be able to facilitate this movement, we will have to temporarily suspend the parking on the southern side of White Hart Lane directly fronting the site to create a right turn pocket for HGV vehicles this will ensure that:

1) HGVs turning right into the site don‘t block the flow of vehicles travelling west.

2) HGV‘s turning right into the site can wait in the turning pocket and not block the path/ flow of traffic travelling east towards the junction.

11.3.8 We have therefore considered that based on the worst case scenario, which doesn‘t include any discounting of the traffic based on the previous use, that subject to the following conditions, S106 and S.278 obligations the proposed development will not result in any significant impact on the transportation and highways network:

1) The applicant is required to enter into a S.278 agreement to implement a highways scheme as per Drawing (White Hart Lane.dwg) to relocate the bus stop, create a right turn pocket into the site and construction of vehicular crossover to facilitate two way HGV movements in and out of the site.
2) The applicant is required to submit details on the management of the site access by way of Traffic Marshalls, to ensure that the free flow of traffic on White Hart Lane in maintained, during the operation of the proposed facility.
3) The applicant is required to submit a construction travel plan for the proposed site, which details how staff will be encouraged to travel by sustainable modes of transport, and measures to encourage staff to travel by sustainable modes of transport.
4) Delivery of cements, sand and aggregate should be coordinated to fall outside the highways network AM and PM peak and the Saturday peak hour.

11.4 Noise and impact on residential amenity

11.4.1 In terms of the noise and disturbance impacts, saved UDP Policies UD3 and ENV6 require development proposals to demonstrate that there is no significant adverse impact on residential amenity including noise and pollution. In addition saved UDP Policy ENV7 necessitates developments to include mitigating measures against the emissions of pollutants and separate polluting activities from sensitive areas including homes. These policies align with London Plan Policy 7.15 and the NPPF which protects residential properties from the transmission of airborne pollutants arising from new developments.

11.4.2 The noise assessment sets out that overall the assessment, which is based on the worst case scenario, concludes that the impact of on-site noise to all but one receptor would be negligible. River Apartments Tower is the sole receptor that would experience an increase in noise levels against the accepted baseline, but

the increase is deemed to be insignificant. A number of objections have been received regarding noise from residents of River Apartments Tower.

11.4.3 Furthermore, it is a key consideration that the working hours of the former car breakers yard were not controlled and therefore the time limits on operation proposed through this planning application will ensure that any noise impacts are limited to those least sensitive parts of the day. This will ensure the new use of the site is more neighbour-friendly than the previous use. Although it was not possible to undertake a noise assessment of the previous car breaking activities, it is acknowledged that this led to significant noise impacts, which have now been removed. The noise impact is therefore acceptable.

11.5 Heritage

11.5.1 The southern end of the site is located within the Conservation Area and lies to the west of a Locally Listed Building.

11.5.2 NPPF chapter 12 'Conserving and enhancing the historic environment' and London Plan policy 7.8 'Heritage Assets and Archaeology' states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Similarly Local Plan Policy (2013) SP12 seeks to ensure the conservation of heritage assets, their setting, and the wider historic environment.

11.5.3 There is a legal requirement for the protection of the Conservation Area. The Legal Position on the impact on these heritage assets is as follows, and Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provide:

"In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".

11.5.4 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."

11.5.5 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of

conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority‘s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

11.5.6 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

11.5.7 The Council‘s Conservation Officer sets out that there is no impact on heritage assets due to the temporary nature of the use. Having regard to the former use, and the site‘s appearance from the Conservation Area, the proposals are not considered to materially impact upon the existing character and appearance of the locality such that the proposals would give rise to harm to the Conservation Area.

11.6 Conclusion

- Although the proposal was advertised as a departure from the development plan policy after consideration of the application and material considerations the proposal is considered to be in accordance with the development plan.
- The provision of a construction compound on this site will improve the efficiency of the construction phase on the main NDP site, allowing the stadium development to be completed more quickly.
- It will also allow for the concrete required to construct the stadium and associated structures to be prepared on a site within 150 metres of the NDP

site and reduce the significant quantities of aggregate recycled on the site from having to be transported to destinations elsewhere for disposal/re-use. It is estimated that approximately 72,900m3 will be excavated in order to form the basement, of this it is estimated that approximately 62,400m3 can be reused on site (i.e. 88%). This will reduce the HGV vehicle kilometres generated by the construction phase of the NDP site which will have spin-off benefits in terms of reducing the air quality impacts when considered in the round.

- While the proposal will have localised impact on the highway network, in White Hart Lane and at the Junction of White Hart Lane and the High Road, these impacts are not significant and can be sufficiently mitigated by the conditions and obligations proposed.
- Localised impact on Air Quality arising from additional traffic into and out of the site will be offset by overall reductions in Carbon Dioxide emissions.
- The submitted noise assessment confirms that, subject to appropriate controls on the proposed operations the increase in noise from the proposed use would be within acceptable limits having regard to the surrounding residential land uses.
- There is no harm caused to Heritage Assets.

12 . Planning Obligations

HGY/2015/3000

STADIUM DEVELOPMENT

- Event Day Mitigation.
- Stadium Travel Plan [a highways, parking and travel plan for the use of the Completed Stadium for Major Events].
- Agree and implement an Event Day Coach Strategy (as part of the Stadium Travel Plan).
- Agree and implement an Event Day Cycling Strategy (as part of the Stadium Travel Plan).
- Local Area Management Plan [Plan to minimise adverse environmental impacts and nuisance to residents and businesses which are otherwise likely to be adversely affected by the use of the Stadium]. Includes stewarding at key junctions and transport interchanges and along main routes.
- Modal Split Target (~~"M~~ST") [77% of spectators using modes of transport other than private car].
- To achieve the MST promote and prioritise a proportion of tickets to local residents
- Event Day Monitoring Programme and Event Day Monitoring Review.
- Implementation of a strategy for providing an event day shuttle bus service between the stadium and Tottenham Hale Station and between the stadium and the Wood Green/Alexandra Park Stations
- Home Supporter Travel Initiative

- Retention of Visitors Measures

PODIUM AND PUBLIC ACCESS SPACE

- Year round public access to the Podium and other publically accessible areas (apart from for one day year).
- Maintenance of Podium and public realm.
- Cultural/Community Events [12 per year for 6 years].

BUSINESS AND SKILLS (COVERING ALL PHASES)

- Employment and Training Strategy to maximise opportunities for local people.
- Business Support Strategy to maximise opportunities for local businesses.

HEALTH CENTRE

- Health Centre Travel Plan

HERITAGE

- THFC to agree and implement a Heritage Management Plan for the heritage assets in its possession including the external refurbishment of buildings within their ownership in the Northern Terrace.

HIGHWAYS

- Completion of match day CPZ in Haringey and Enfield
- Completion of Highways works including:
    - Bus priority measures on Northumberland Park, Willoughby Road, Shelbourne Road and Lansdowne Road,
    - Improvements to Chestnut Road
    - New pelican crossings on the High Road.
    - New crossing point at Park Lane Junction with Shelbourne Road.
    - Upgrading Worcester Avenue.
- Implementation of a strategy, to be agreed with the Council, for improvements to the walking route between the Stadium and White Hart Lane Station.
- Implementation of a signage strategy, to be agreed with the Council, for the proposed walking route between the Stadium and main transport interchanges.
- Additional Worcester Avenue traffic suspension.

ENERGY

- Connection of all parts of the scheme to District Energy Network (DEN) if feasible and viable.
- Agree and implement a strategy for providing a single site wide energy centre in the event of the DEN not coming forward.

HOTEL DEVELOPMENT

- Hotel Travel Plan.

RESIDENTIAL, FLEXIBLE COMMUNITY/COMMERCIAL AND EXTREME SPORTS

- Review Mechanism for off-site affordable housing contribution.
- Residential Travel Plan.
- Community/Commercial Travel Plan.

- Extreme Sports Travel Plan.
- Residents Parking Permit free development.
- Car Club.

MISCELLANEOUS

- Educational visits
  Considerate Constructors Scheme

13. CIL

13.1 HGY/2015/3000

13.1.1 This is a ‗hybrid' planning application with part of the scheme (Stadium, Tottenham Experience and Hotel) submitted in full and the remainder (Residential, Extreme Sports, Flexible Community/Health Uses and Community Health Building) submitted in outline. At this stage CIL contributions are calculated for those parts of the scheme applied for in full. The CIL contributions for those parts of the scheme submitted in outline will be calculated at the submission of the first reserved matters application for that part.

13.1.2 Based on the information given on the plans, the Mayor's CIL charge for those parts of the scheme submitted in full will be £3,728,515.00 (106,529 sqm of net additional floorspace x £35.00). As the residential element of the proposal is in outline there is no CIL liability at this stage. As an indication the residential floorspace in the indicative scheme would generate a CIL contribution of approximately an additional £3 million at reserved matters stage.

13.1.3 The Mayoral CIL contribution will be collected by Haringey after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

13.2 HGY/2015/3002

13.2.1 There is no increase in floorspace and as such is not liable for CIL.

14. RECOMMENDATIONS

HGY/2015/3000

GRANT PERMISSION subject to conditions and subject to sec. 106 Legal Agreement

HGY/2015/3001

GRANT PERMISSION subject to conditions

HGY/2015/3002

GRANT PERMISSION subject to conditions and section 278 Agreement

List of Appendices

1. (a) Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3000 and Listed Building Application HGY/2015/3001

(b) Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3002

2. Site Plans and Scheme Images
3. Map North Tottenham High Road Conservation Area
4. Quality Review Panel reports
5. Summary of comments received
6. LBH Transportation comments
7. LBH Conservation Officer comments
8. Historic England and LAC responses
9. GLA Stage 1 Report
10. Transport for London response
11. Independent Review of Crowd Safety
12. Independent Acoustic Review
13. LBH Lead Officer Pollution comments
14. LBH Head of Carbon Management comments
15. Thames water comments
16. Environment Agency comments
17. Natural England comments
18. Tottenham CAAC comments
19. Victorian Society comments
20. Our Tottenham Comments
21. Tottenham Conservation Comments
22. Tottenham Business Group Comments
23. Save Britain‘s Heritage Comments
24. Conditions

Appendix 1a: Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3000 and Listed Building Application HGY/2015/3001

Stadium Drawings	
POP-4494-PLN-GA-0119 – REV 0	POP-4494-PLN-SC-0158 – REV 0
POP-4494-PLN-GA-0120 – REV 0	POP-4494-PLN-SC-0159 – REV 0
POP-4494-PLN-GA-0121 – REV 0	POP-4494-PLN-SC-0160 – REV 0
POP-4494-PLN-GA-0122 – REV 0	POP-4494-PLN-SC-0161 – REV 0
POP-4494-PLN-GA-0123 – REV 0	POP-4494-PLN-SC-0170 – REV 0
POP-4494-PLN-GA-0124 – REV 0	POP-4494-PLN-SC-0171 – REV 0
POP-4494-PLN-GA-0125 – REV 0	POP-4494-PLN-SC-0175 – REV 0
POP-4494-PLN-GA-0126 – REV 0	POP-4494-PLN-SC-0180 – REV 0
POP-4494-PLN-GA-0127 – REV 0	POP-4494-PLN-SC-0181 – REV 0
POP-4494-PLN-GA-0128 – REV 0	POP-4494-PLN-SC-0182 – REV 0
POP-4494-PLN-GA-0129 – REV 0	POP-4494-PLN-SC-0183 – REV 0
POP-4494-PLN-GA-0130 – REV 0	POP-4494-PLN-SC-0184 – REV 0
POP-4494-PLN-GA-0131 – REV 0	POP-4494-PLN-SC-0185 – REV 0
POP-4494-PLN-GA-0132 – REV 0	POP-4494-PLN-SC-0186 – REV 0
POP-4494-PLN-GA-0135 – REV 0	POP-4494-PLN-SC-0187 – REV 0
POP-4494-PLN-GA-0140 – REV 0	POP-4494-PLN-SC-0188 – REV 0
POP-4494-PLN-EL-0142 – REV 0	POP-4494-PLN-SC-0189 – REV 0
POP-4494-PLN-SC-0143 – REV 0	POP-4494-PLN-SC-0190 – REV 0
POP-4494-PLN-SC-0150 – REV 0	POP-4494-PLN-SC-0191 – REV 0
POP-4494-PLN-SC-0151 – REV 0	POP-4494-PLN-SC-0192 – REV 0
POP-4494-PLN-SC-0152 – REV 0	POP-4494-PLN-SC-0193 – REV 0
POP-4494-PLN-SC-0153 – REV 0	POP-4494-PLN-SC-0194 – REV 0
POP-4494-PLN-SC-0154 – REV 0	POP-4494-PLN-SC-0195 – REV 0
POP-4494-PLN-SC-0155 – REV 0	POP-4494-PLN-SC-0198 – REV 0
POP-4494-PLN-SC-0156 – REV 0	POP-4494-PLN-SC-0199 – REV 0
POP-4494-PLN-SC-0157 – REV 0	

Warmington House/Tottenham Experience Drawings	
POP-4494-PLN-GA-0200 – REV 0	POP-4494-PLN-EL-0231 – REV 0
POP-4494-PLN-GA-0201 – REV 0	POP-4494-PLN-EL-0232 – REV 0
POP-4494-PLN-GA-0202 – REV 0	POP-4494-PLN-EL-0233 – REV 0
POP-4494-PLN-GA-0208 – REV 0	POP-4494-PLN-EL-0234 – REV 0
POP-4494-PLN-EL-0220 – REV 0	POP-4494-PLN-EL-0235 – REV 0

POP-4494-PLN-EL-0230 – REV 0	

Hotel Drawings	
POP-4494-PLN- GA-0300-0 – REV 0 POP-4494-PLN- GA-0301-0 – REV 0 POP-4494-PLN- GA-0302-1 – REV 0 POP-4494-PLN- GA-0303-0 – REV 0 POP-4494-PLN- GA-0304-1 – REV 0 POP-4494-PLN- GA-0305-0 – REV 0 POP-4494-PLN- GA-0306-0 – REV 0 POP-4494-PLN- GA-0307-0 – REV 0 POP-4494-PLN- GA-0308-0 – REV 0	POP-4494-PLN- SC-0320-0 – REV 0 POP-4494-PLN- SC-0321-0 – REV 0 POP-4494-PLN- EL-0330-0 – REV 0 POP-4494-PLN- EL-0331-0 – REV 0 POP-4494-PLN- EL-0332-0 – REV 0 POP-4494-PLN- EL-0333-0 – REV 0 POP-4494-PLN- EP-0340-0 – REV 0 POP-4494-PLN- EE-0341-0 – REV 0

Extreme Sports Hub Drawings	
Parameter Plans	Illustrative Plans
POP-4494-PLN-PP-0400 – REV 0 POP-4494-PLN-PP-0401 – REV 0 POP-4494-PLN-PP-0402 – REV 0 POP-4494-PLN-PP-0403 – REV 0 POP-4494-PLN-PP-0404 – REV 0 POP-4494-PLN-PP-0405 – REV 0 POP-4494-PLN-PP-0406 – REV 0 POP-4494-PLN-PP-0407 – REV 0 POP-4494-PLN-PP-0408 – REV 0 POP-4494-PLN-PP-0410 – REV 0 POP-4494-PLN-PP-0411 – REV 0 POP-4494-PLN-PP-0412 – REV 0 POP-4494-PLN-PP-0413 – REV 0 POP-4494-PLN-PP-0414 – REV 0 POP-4494-PLN-PP-0415 – REV 0 POP-4494-PLN-PP-0416 – REV 0 POP-4494-PLN-PP-0417 – REV 0 POP-4494-PLN-PP-0418 – REV 0 POP-4494-PLN-PP-0419 – REV 0	POP-4494-PLN-IP-0420 – REV 0 POP-4494-PLN-IP-0421 – REV 0 POP-4494-PLN-IP-0422 – REV 0 POP-4494-PLN-IP-0423 – REV 0 POP-4494-PLN-IP-0424 – REV 0 POP-4494-PLN-IP-0425 – REV 0 POP-4494-PLN-IP-0426 – REV 0 POP-4494-PLN-IP-0427 – REV 0 POP-4494-PLN-IP-0428 – REV 0 POP-4494-PLN-IP-0429 – REV 0 POP-4494-PLN-EL-0430 – REV 0 POP-4494-PLN-EL-0431 – REV 0 POP-4494-PLN-EL-0432 – REV 0 POP-4494-PLN-EL-0433 – REV 0 POP-4494-PLN-SC-0440 – REV 0 POP-4494-PLN-SC-0441 – REV 0

Residential Drawings	
Parameter Plans	**Illustrative Drawings**
1007_07_PP_000 – REV P4 1007_07_PP_001 – REV P5 1007_07_PP_002 – REV P5 1007_07_PP_003 – REV P5 1007_07_PP_004 – REV P5 1007_07_PP_005 – REV P5 1007_07_PP_006 – REV P5 1007_07_PP_007 – REV P4 1007_07_PP_008 – REV P4 1007_07_PP_009 – REV P5 1007_07_PP_010 – REV P5 1007_07_PP_011 – REV P5 1007_07_PP_012 – REV P5 1007_07_PP_013 – REV P5 1007_07_PP_014 – REV P4 1007_07_PP_015 – REV P4 1007_07_PP_016 – REV P4 1007_07_PP_017 – REV P4 1007_07_PP_018 – REV P4 1007_07_PP_019 – REV P4	1007_07_098 – REV P4 1007_07_099 – REV P4 1007_07_100 – REV P4 1007_07_101 – REV P4 1007_07_102 – REV P4 1007_07_103 – REV P4 1007_07_104 – REV P4 1007_07_105 – REV P4 1007_07_106 – REV P4 1007_07_107 – REV P4 1007_07_115 – REV P4 1007_07_119 – REV P4 1007_07_120 – REV P4 1007_07_123 – REV P4 1007_07_128 – REV P4 1007_07_131 – REV P4 1007_07_136 – REV P4 1007_07_200 – REV P4 1007_07_201 – REV P4 1007_07_202 – REV P4 1007_07_203 – REV P2 1007_07_204 – REV P1 1007_07_300 – REV P4 1007_07_301 – REV P4 1007_07_302 – REV P4 1007_07_303 – REV P4

Community Health Centre Drawings	
Parameter Plans	**Illustrative Drawings**
POP_4494_PLN_GA_0501 – REV 0 POP_4494_PLN_GA_0502 – REV 0 POP_4494_PLN_GA_0510 – REV 0 POP_4494_PLN_GA_0511 – REV 0 POP_4494_PLN_GA_0512 – REV 0 POP_4494_PLN_GA_0513 – REV 0 POP_4494_PLN_EL_0532 – REV 0	POP_4494_PLN_GA_0520 – REV 0 POP_4494_PLN_GA_0521 – REV 0 POP_4494_PLN_GA_0522 – REV 0 POP_4494_PLN_GA_0523 – REV 0 POP_4494_PLN_EL_0530 – REV 0 POP_4494_PLN_EL_0531 – REV 0 POP_4494_PLN_SC_0540– REV 0 POP_4494_PLN_SC_0541– REV 0 POP_4494_PLN_EL_0542 – REV 0 POP_4494_PLN_EL_0543 – REV 0

Landscape Plans & Public Realm	
POP-4494-PLN-GA-8000 – REV 0 POP-4494-PLN-GA-8001 – REV 0 POP-4494-PLN-GA-8002 – REV 0 POP-4494-PLN-GA-8003 – REV 0 POP-4494-PLN-GA-8004 – REV 0 POP-4494-PLN-GA-8005 – REV 0 POP-4494-PLN-SC-8006 – REV 0	POP-4494-PLN-SC-8007 – REV 0 POP-4494-PLN-DP-8008 – REV 0 POP-4494-PLN-GA-8009 – REV 0 POP-4494-PLN-GA-8100 – REV 0 POP-4494-PLN-GA-8101 – REV 0 POP-4494-PLN-GA-8102 – REV 0

Environmental Statement
Environmental Statement Volume 1 (Non-Technical Summary) Environmental Statement Volume 2 (Main Report) Environmental Statement Volume 3 (Technical Appendices)

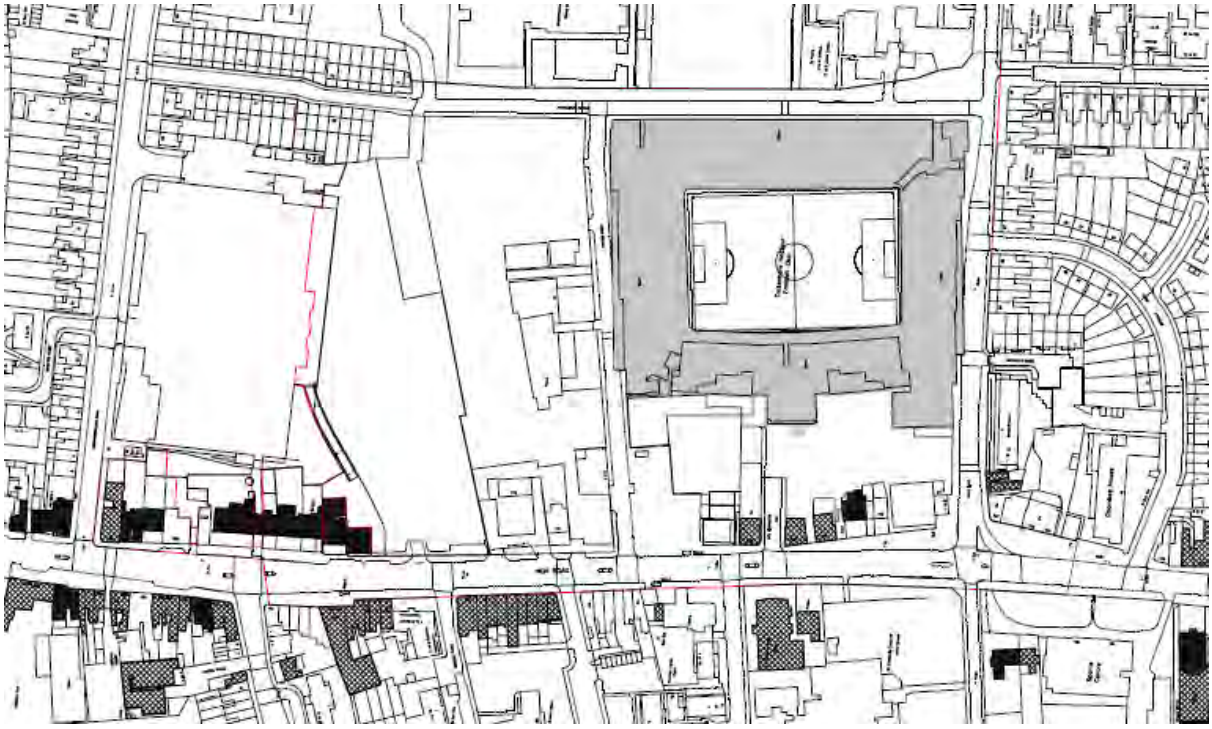
Technical Reports
Planning Statement Heritage Statement Design & Access Statement Residential Design Code

Statement of Community Involvement
Tree Survey
Energy Strategy
Water Strategy
Utilities Planning Report
Sustainability Report
Transport Assessment

Appendix 1b: Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3002

Site Boundary Plan;
Drwg No. 001506_25_1;
Contaminated Land Report (24.04.2015);
Noise Impact Assessment Sep 2015;
Design, Access & Planning Statement Sep 2015.

Appendix 2a Site Plan – NDP Site



Appendix 2b Site Plan – 44 White Hart Lane



Appendix 2c – View of proposal from west.



Appendix 2d – View of Tottenham Experience from the south.

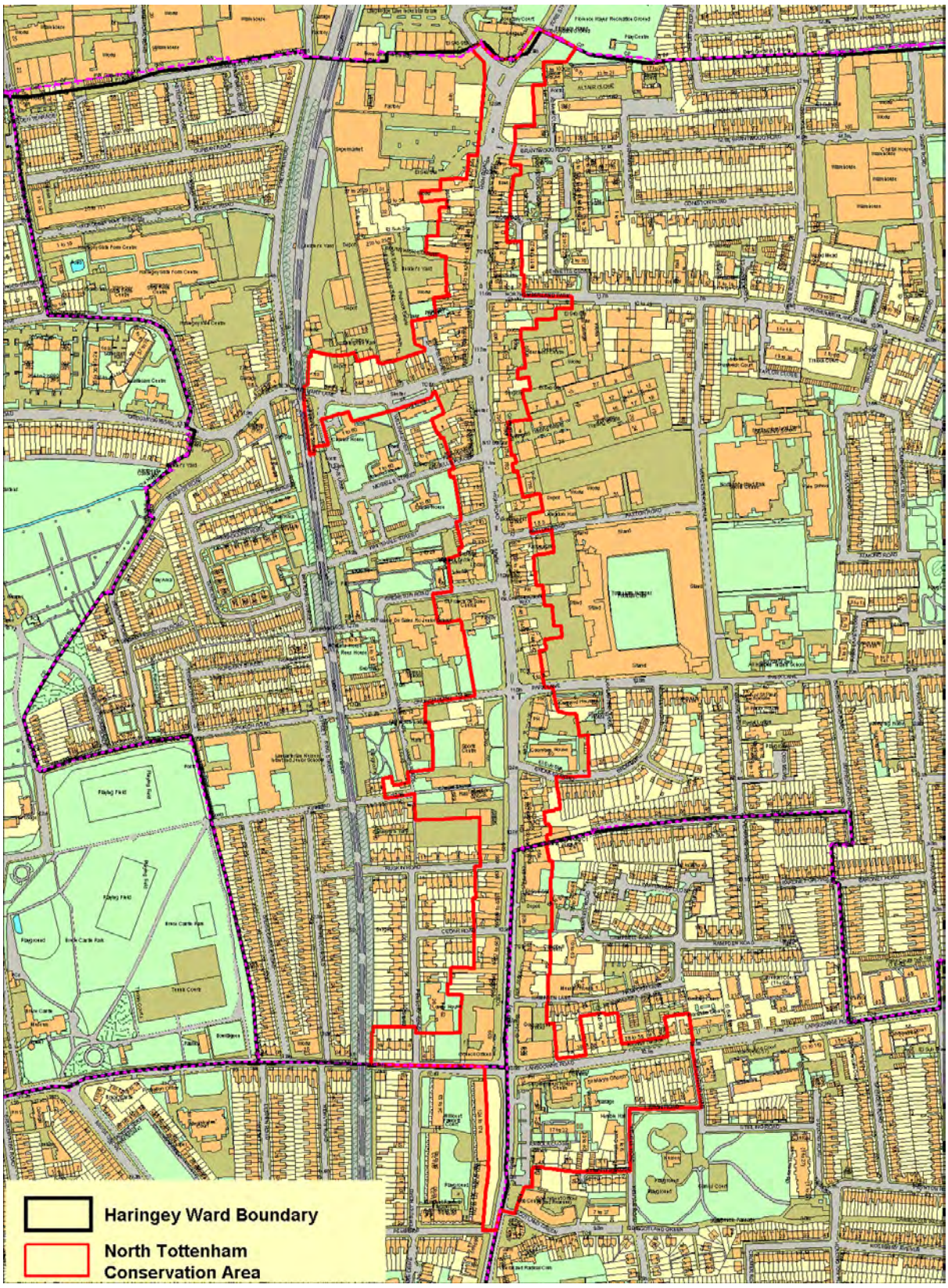


Appendix 2e– View of Tottenham Experience from above.



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Appendix 3 North Tottenham High Road Conservation Area Map



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FRAME PROJECTS

London Borough of Haringey Quality Review Panel

Report of Formal Review Meeting: Tottenham Hotspur Northumberland Development Project

Wednesday 15 July 2015
River Park House, 225 High Road, London, N22 8HQ

Panel

Peter Studdert (chair)
Selina Mason
Chris Twinn
Gary Elliott
John Lyall

Attendees

Stephen Kelly	London Borough of Haringey
Neil McClellan	London Borough of Haringey
Richard Truscott	London Borough of Haringey
Nairita Chakraborty	London Borough of Haringey
Deborah Denner	Frame Projects

Apologies / report copied to

Emma Williamson	London Borough of Haringey
Sarah Lovell	Tottenham Regeneration Programme

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Haringey Council is subject to the Freedom of Information Act (FOI), and in the case of an FOI request may be obliged to release project information submitted for review.

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1. Project name and site address

The Northumberland Development Project, High Road, N17

2. Presenting team

Richard Serra	Head of Planning, THFC
Adam Davison	Head of Community Relations, THFC
Tom Jones	Populous
Maria Knuttson-Hall	Populous
Chris Bearman	Allies & Morrison
David Roach	DP9
Rebecca Rogers	DP9

3. Planning authority's views

Tottenham Hotspur Football Club was granted planning permission by Haringey Council in 2011 for the redevelopment of White Hart Lane Stadium and the land around it. Phase 1 has been completed and comprises the new Sainsbury's superstore on Northumberland Park Avenue and Lilywhite House which is home to Tottenham University Technical College and the football club's offices. A revised planning application is proposed, including a larger stadium – 61,000 seats rather than the 56,250 approved in 2011 and more flats – 579 rather than 285 previously approved. Other features of the revised proposal are a new club store and museum described as the 'Tottenham Experience', an extreme sports centre, a 180 bed hotel, a community medical centre and new public square.

The proposals include works to the Grade II Listed Warmington House, and removal of three locally listed buildings all of which are located in the Conservation Area facing the High Road. The impact of this on the conservation area will have to be balanced against the wider regeneration benefits of the scheme. The emerging Tottenham Area Action Plan supports the comprehensive regeneration of North Tottenham and Northumberland Park including taller or higher density development near to the redeveloped Tottenham Hotspur FC Stadium.

A hybrid planning application is proposed for the current scheme, with the stadium, hotel and 'Tottenham Experience' in detail, and the extreme sports hub and health centre in outline. A decision has not yet been made on whether to submit an outline or detailed application for the residential tall buildings.

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5. Quality Review Panel's views

Summary

The scale and ambition of the development proposals by Tottenham Hotspur create a highly challenging brief. However, the panel finds much to admire in the proposals designed by Populous for the stadium, hotel, extreme sports hub, 'Tottenham Experience', and health centre; and by Allies & Morrison for the housing. The panel offers cautious support to the scale and massing of development, in the context of the scale of the stadium - and on the basis that analysis of townscape impact, environmental conditions, and architectural expression will continue. Substantial further work is also required to demonstrate the quality of public spaces within the development, around its perimeter, in relation to the High Road and 'High Road West' regeneration scheme. In this context the panel suggests that redesigning a section of the High Road next to the site as a shared surface should be considered. The panel would not support demolition of three locally listed buildings to facilitate the widening of the pavement, when alternative solutions to improve pedestrian safety have not been thoroughly explored. The panel would also not support an outline application for the residential tall buildings, and recommends detailed planning applications, to allow the planning authority to secure high quality design and construction. More detailed comments are provided below on: the stadium; 'Tottenham Experience'; hotel and extreme sports hub; residential tall buildings; landscape / street design and sustainability.

Stadium

- Populous are highly skilled in the design of stadiums, and this is apparent in the quality of their proposals for Tottenham Hotspur.

- However the relationship between the station and the streets around it, particularly the High Road, would benefit from more thought.

- The panel do not think that the escalator at the front of the building is a successful marker for the main entrance, and would encourage exploration of an entrance framed by two escalators. This could also allow for a more generous space outside the entrance.

- Creating a more human scaled building, fronting the high street to the back edge of the pavement, could also help mediate between the massive scale of the stadium and its context.

- The five storey south facing atrium is likely to suffer from high temperatures due to solar gain. Environmental analysis should inform the façade design to ensure this is a comfortable space.

- The panel also thinks that the muscular architecture of the east stand is more successful than the west stand, where a number of architectural elements create a more fussy façade.

Tottenham Experience / Locally Listed Buildings

- The panel would encourage the design team to reconsider the decision to demolish three locally listed buildings on the south west corner of the site.

- In the panel's view, these are of equal quality and significance to the listed Warmington House.

- The panel understands the rationale for removing these buildings, to create a broader pavement on Tottenham High Road, where match day crowds are currently forced into the road.

- However, the panel thinks that re-designing this section of the High Road as a shared surface, similar to High Street Kensington, could achieve similar safety benefits without loss of the locally listed buildings.

- The panel would encourage partnership working with Haringey Council and Transport for London to explore creating a shared surface zone to calm the traffic on this section of the High Road and provide a more attractive and safe environment for pedestrians.

- The current design of the 'Tottenham Experience' was not discussed in detail, as the panel recommends a rethink of this element of the scheme to retain the locally listed buildings.

Hotel and Extreme Sports Hub

- The panel welcomes the concept of the extreme sports hub, which has the potential to attract visitors throughout the year, complementing the activity generated by events at the stadium.

- The hotel is designed as a tall building above a lower podium which relates to the scale of existing houses on Park Lane.

- Whilst the panel supports this approach, more information will be needed to demonstrate that the architecture and accommodation in the podium will create an active, high quality street edge.

- Views of the development from street level on Park Lane would help illustrate how the development will affect the character of this residential street.

- In views from the south along the High Road, the panel welcomes the slender proportions of the hotel tower.

- However, the hotel tower is illustrated as being highly glazed, and the panel think this should be reconsidered, especially on the south facing elevation, to avoid excessive solar gain.

Residential Tall Buildings

- The panel would not support an outline approval for the residential tall buildings, and think detailed planning approval will be essential to secure high quality materials and construction.

- However, the panel offers cautious support for the scale of development proposed, in the context of the scale of the stadium, and recognises the care and attention to detail with which the design has been developed by Allies & Morrison.

- As design work continues, opportunities to foster a sense of community should be explored, for example through shared private gardens, generous lobbies, and communal facilities.

- The podium of the residential development is a continuation of the hotel and extreme sports podium – requiring collaboration between Populous and Allies & Morrison to resolve its design.

- This podium needs further thought, in terms of architectural expression, and to ensure a positive relationship with Park Lane.

- The sustainability of the residential tall buildings also requires further exploration – for example to determine the appropriate proportions of solid façades and glazing to avoid overheating.

- The current scheme includes some single aspect flats, which the panel think should be avoided – in part because they lack cross ventilation. Adjusting the mix of unit sizes could minimise or avoid single aspect flats.

Landscape and Street Design

- Limited information on landscape design was presented, and the panel would welcome a further opportunity to comment on this.

- The panel's view that the section of Tottenham High Road could be designed as a shared surface, to improve pedestrian safety without loss of the locally listed buildings, is set out above.

- It could be helpful to apply the TfL Roads Task Force methodology to thinking about the character of the High Road, and how it could be improved for pedestrians. Tottenham Hotspur should engage in this, and contribute to enhancements that will benefit their development.

- The nature of the podium level plaza to the east of the site also requires further consideration. As this will not be visible from street level, it may not be well populated.

- Destination uses such as shops or restaurants and/or a programme of events such as farmers markets, could help activate the podium plaza.

- An estate regeneration scheme, known as ‘High Road West’ is proposed to the west of the site, including a new public space on the route to White Hart Lane Station.

- It would be reasonable to expect Tottenham Hotspur to contribute to the cost of this public space, to accommodate the pressure of a 61,000 seat stadium and 580 unit residential development on pedestrian routes in the surrounding area.

- It is unlikely that delivery of a high quality civic space will be achievable solely through the public private partnership for the estate regeneration.

Social and Environmental Sustainability

- Sun path and wind analysis should inform the design of public spaces, especially where tall buildings will generate down draughts.

- For example, where steps are shown alongside the hotel, leading to the podium plaza, downdraughts are likely to generate high wind speeds at ground level.

- The panel notes that wind tunnel analysis is usually based on safety, rather comfort. However, the cooling effect of wind may, for example, make it impossible for cafes to spill out into the public realm.

- In terms of socio-economic sustainability, the panel is concerned that the highly complex and specific forms of development proposed lack flexibility for future adaptation.

- For example, the proposition of 580 new homes in residential tall buildings, the majority of which will be sold with long leases, is a risky strategy, that will depend on high quality construction and ongoing maintenance for its long-term success.

- The panel would encourage the design team to consider ways in which a ‘long life loose fit’ approach could be applied, to allow flexibility for future changes in use.

- A proportion of affordable housing would also help support the social sustainability of this scheme.

- The panel would welcome a more detailed briefing on environmental and social sustainability at a future review, and would expect a development of this stature to perform well in excess of minimum requirements.

- There may be ways of achieving this that do not add to the cost of development, such as covering the roof of the stadium with photovoltaic panels. Feed in tariffs should make this a self financing measure.

Next Steps

- The panel would welcome a further opportunity to comment on more detailed proposals for the Tottenham Hotspur Stadium and Housing, before an application is submitted.

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FRAME PROJECTS

London Borough of Haringey Quality Review Panel

Report of Planning Application Review Meeting: The Northumberland Development Project

Wednesday 21 October 2015
Committee Room 2, First Floor, Civic Centre, High Road, London, N22 8LE

Panel

Peter Studdert (Chair)
Deborah Nagan
Tim Pitman
Chris Twinn
Selina Mason

Attendees

Richard Truscott	London Borough of Haringey
Nairita Chakraborty	London Borough of Haringey
Neil McClellan	London Borough of Haringey
Deborah Denner	Frame Projects
Sarah Carmona	Frame Projects

Apologies / report copied to

Stephen Kelly	London Borough of Haringey
Emma Williamson	London Borough of Haringey

1. Project name and site address

The Northumberland Development Project, High Road, N17
Planning application reference: HGY/2015/3000

2. Presenting team

Tom Jones	Populous
Chris Bearman	Allies & Morrison
Laurie Hallows	Allies & Morrison
David Roach	DP9
Rebecca Rogers	DP9
Chris Goddard	DP9

3. Planning authority's views

Tottenham Hotspur Football Club were granted planning permission by Haringey Council in 2011 for the redevelopment of White Hart Lane Stadium and the land around it. This scheme was known as the Northumberland Park Development (NDP) scheme. Phase 1 of the NDP scheme has been completed and comprises the new Sainsbury's superstore on Northumberland Park Avenue and Lilywhite House which is home to Tottenham University Technical College and the football club's offices. Tottenham Hotspur have now submitted a new planning application that revises their proposals for the rest of the site.

The new application comprises a larger stadium – 61,000 seats rather than the 56,250 approved in 2011 and more flats – 579 rather than 285 previously approved. Other features of the revised proposal are a new club store and museum described as 'the Tottenham Experience', an extreme sports centre, a 180 bed hotel, a community medical centre and new public square. Part of the site lies within the Tottenham High Road Conservation Area. The proposals also include works to the Grade II Listed Warmington House and the demolition of three locally listed buildings (located in the Conservation Area), which were to be retained within the existing planning permission. The impact of these alterations to the existing listed buildings and their setting will need to be carefully considered.

At a strategic level Council policy promotes development in the Northumberland Park area of change. The recently approved Tottenham Area Action Plan supports the comprehensive regeneration of North Tottenham and Northumberland Park including taller or higher density development near to the redeveloped Tottenham Hotspur FC Stadium. While the Council is supportive of the Football clubs ambitions and the regenerative effect of an expanded stadium, increased non-football leisure offer and additional housing, the transport and environmental impacts need to be understood and where necessary mitigated.

4. Quality Review Panel's views

Summary

The panel welcomes the level of detail in the design of the public realm, however they feel that the design of the podium-level public space requires further refinement in order to deliver a comfortable, welcoming places. The panel have concerns about the visibility and viability of the public space as a destination.

The panel is supportive of the design of the stadium building, and welcomes the improvements that have been made since the last review, concerning the fluidity and visual coherence of the different facades.

The panel recognise the long-standing need for a community health building, and supports the scale of the proposal for the building, but feels that access and layout issues require further consideration.

The panel supports the use of cast iron in the façade of the Tottenham Experience, but feels that its success will depend on the quality of the detailing and the articulation of visual rhythms that reflect the proportions of Warmington House.

The panel broadly supports the design of the hotel, and feels that the elevational treatments are exciting. Further consideration of the public realm at the entrance would be welcomed, as would the introduction of a canopy to reduce negative wind effects from the tower above.

The panel accepts the broad scale and indication of quality of the extreme sports building, but has concerns over the viability of the use, and would like to see more detail concerning the proposals.

Whilst the panel broadly supports the scale and level of detail of the residential section of the development, they strongly advise the Council not to accept an outline planning application for the residential tall building on such an important and prominent site. There is a risk that the scheme may be 'dumbed down' in design quality once the principle of development has been established.

More detailed comments on the masterplan and public realm, stadium, community health building, Tottenham Experience, hotel, extreme sports hub, and the residential development are listed below.

Masterplan and public realm

- Full planning permission sought.
- The panel acknowledges the investigations into retaining the three locally listed buildings (including providing a shared surface) that have been undertaken since the previous review.

- Whilst the panel understands that the option to remove the buildings has been supported by the Council's independent crowd safety specialist, it remains disappointed at the proposed loss of heritage assets from the High Road..

- The panel is concerned that the landscaping scheme (around the stadium and extending onto the High Road) is too focused on leading spectators up to the stadium,.and believes that the public realm design should strike a better balance between the line of the High Road and the attraction of the stadium.

- The panel welcomes the idea of a linked series of spaces extending beyond the site in the wider master plan for the area.

- However, concerns were expressed about the main public space at podium level in that, as it is at a higher level and not visible from the street, it may lack vitality and footfall.

- An ongoing programme of events and activities within the main space is required in order to encourage people up the three flights of stairs to the podium on non-match days.

- Careful consideration of the layout with regard to sun, wind, overshadowing and enclosure is required to make sure that the space is attractive and comfortable, both for local residents and for visitors to the stadium.

Stadium

- Full planning permission sought.

- At the initial review (July 2015), concerns were raised about the prominence of the five storey elevator projecting out from the façade on the west elevation.

- The panel welcomes the response to their previous comments, of extending the glazing out to create a canopy, visually integrating the escalator.

- The panel notes that the square form of the front door is a little subdued, and offers an opportunity for a more distinctive entrance.

- The panel welcomes the amendments to the east elevation (Worcester Avenue), aligning the peak of the perforated metal skin with the entrance below.

- The panel commented that the addition of signage (not currently shown on the proposals) would add another level of complexity to the façade.

- The scale and illumination of the signage will help to identify the hierarchy of the primary and secondary entrances.

- The panel feels that there is now much more coherence between the different facades, and supports the elegance and unity created within the muscular form of the architecture.

Community health building

- Outline planning permission sought; detailed approval sought for “access”, “layout” and “scale”. The application seeks to reserve matters relating to “appearance”.

- The panel questions the layout of the community health building in relation to the other parts of the scheme.

- The panel feels that the community health building has been designed around the requirements of the service yard adjacent, to the detriment of the eventual users who will be using the health building.

- The nature of the service access (ramping up next to neighbouring houses) creates a poor and unfriendly edge to the neighbouring houses at Worcester Avenue.

- Careful consideration of the entrances is required as the use of the building is public facing. The panel would welcome a more visible and accessible entrance at street level.

- The panel supports the scale of the community health building, and welcomes the stepping-down of the massing to the neighbouring buildings.

- The panel understands that more detailed design will be undertaken when a specific user for the building has been found, and would welcome the opportunity to comment on the detailed proposals.

Tottenham Experience

- Full planning permission sought.

- The panel questions the use of a glazed element to separate the new buildings from Warmington House as it potentially is difficult to manage and maintain, especially at roof level.

- The panel feels that the quality of the detailing will be critical to the overall success of how the new buildings forming the Tottenham Experience integrate with Warmington House.

- The overall massing of the Tottenham Experience is suggestive of a large building, rather than a continuation of a terrace.

- The panel welcomes the use of cast iron within the façade, and supports the principle of reflecting the visual rhythms of Warmington House as a mechanism to integrate the new with the old.

- The ground level of the new buildings is currently shown as a continuous horizontal element.

- The panel would encourage greater articulation of this ground level element, to reflect the rhythms and breaks continuing down to ground level.

- The panel is broadly supportive of the direction of the proposal, but feels that it will be very important to achieve an active frontage for this part of the development.

Hotel

- Full planning permission sought.

- It was recognised that whilst the hotel entrance has a lobby, there is the opportunity to reduce external wind downdraughts from the tower through the provision of an external canopy.

- The canopy could also provide a visual link to the architecture and materials of the stadium building.

- It was noted that there is an uneasy relationship between the hotel entrance and the public realm immediately outside, often highlighted by the placement of trees in tubs aiming to create a more exclusive area of pavement.

- Careful consideration of the public realm adjacent to the entrance should create a balance between the needs of the hotel and those of the users of the space outside.

- The panel welcome the refinements within the design of the façade, and feels that the diagonal slashes that have been introduced will create an exciting elevation.

Extreme sports building

- Outline planning permission sought; detailed approval sought for “access”, and “layout”. The application seeks to reserve matters relating to “appearance” and “scale”.

- The panel expressed concerns over the viability of the proposed extreme sports building.

- Comprehensive analysis on predicted use levels would be helpful, in order to ensure that the proposal is viable.

- It was noted that there is not currently an operator for the building.

- The panel expressed concerns that the very specific nature of the building precludes a loose-fit design, and so will not easily convert to other uses if this venture does not prove commercially viable.

- The panel accepts the broad scale and design principles of the scheme, but feels that more detail is required to demonstrate the quality and viability of the extreme sports building.

Residential

- Outline planning permission sought; detailed approval sought for “access”, “layout” and “scale”. The application seeks to reserve matters relating to “appearance” and “landscape”

- The panel expressed concerns that the residential tower to the south of the site would effectively put the plaza into shade for a significant period of the day which would impact upon the amenity value of the space.

- The panel felt that the images of the proposed spaces and gardens were very persuasive and aspirational, but noted that they may not reflect the true climatic environment within a development of this scale.

- It was suggested that more solid shelter would be required to alleviate the wind climate generated by the towers.

- The panel would recommend more careful consideration of the planting schemes, bearing in mind the microclimate created by tall buildings, and suggested mixed rather than native planting in this context.

- Residents will need to have well-designed shared amenity space, as the public space on the podium has a more commercial focus.

- The panel welcomed the use of corner balconies as an elegant articulation of detail on the façade, but recommended that one side of the balcony be glazed to reduce wind pressure (maximum wind pressure occurs at the corners).

- It was suggested that the light wells should have openable windows to support natural ventilation.

- The panel would support measures to reduce the numbers of internal corridors and single aspect dwellings; additionally, rooflights in stairwells would be welcomed.

- The panel feels that measures to combat overheating should be embedded in the detailed design and construction of the residential development.

- The panel understands that viability discussions regarding the provision of affordable housing are underway.

- Despite concerns over high maintenance charges, the panel would expect a development of this stature to meet policy requirements for affordable housing.

- The panel feels that if the details presented were carried through to the detailed application stage, then they would warmly support the proposals, subject to some minor adjustments.

- The proposals have developed in a positive way, and the panel accepts the general principle and scale of the residential development, and notes that the hotel and residential blocks are visually related.

- The panel notes that tall buildings succeed or fail on the quality of their detailed design, and concerns were expressed that the current application is for outline permission only.

- In this respect, the panel strongly advises that the Council does not accept the outline application on such an important and prominent site.

- It was felt that there is a risk of the design and construction quality being 'dumbed down' (through value engineering) subsequent to the precedent for development being established through outline permission.

Next steps

- Masterplan and public realm: the panel recommends further thought about the nature of the podium level plaza, before planning permission is granted, and would welcome a further opportunity to comment on this.

- Stadium: the panel is confident that the project team will be able to address the comments on this element of the scheme, in consultation with Haringey officers.

- Community health building: the panel would welcome the opportunity to comment further upon the detailed design of this element.

- Tottenham Experience: the panel records its disappointment that these proposals involve the loss of heritage assets from the High Road. If the Council accepts this is unavoidable due to safety concerns, the panel broadly supports the proposed design, subject to the detailed comments above.

- Hotel: the panel is confident that the project team will be able to address the comments on this element of the scheme, in consultation with Haringey officers.

- Extreme sports building: the panel has concerns about the viability of this element of the scheme, and would welcome a further opportunity to comment on more detailed proposals.

- Residential: The panel recommends that an outline planning application should not be accepted due to the prominence and importance of the site, and recommends a detailed planning application, to allow the planning authority to secure high quality design and construction.

Appendix 5a Consultation Responses from internal and external agencies and individuals.

No.	Stakeholder	Question/Comment	Response
	INTERNAL		
	LBH Transportation	This stakeholders comments are set out in full in Appendix 6 of this report	Comments noted and conditions have been imposed as recommended. A legal agreement is also recommended in order to secure the provision of mitigation measures as set out in report.
	LBH Conservation Officer	This stakeholders comments are set out in full in Appendix7 of this report.	Comments noted and conditions imposed as recommended.
	LBH Head of Carbon Management	This stakeholders comments are set out in full in Appendix 14 of this report.	Comments noted and a legal agreement is also recommended in order to secure the provision of mitigation measures as set out in report.
	LBH Senior Drainage Engineer	Drainage strategy is acceptable subject to conditions.	Comments noted and conditions imposed as recommended.
	LBH Env Hlth – Lead Officer Pollution	This stakeholders comments are set out in full in Appendix 13 of this report.	Comments noted and conditions imposed as recommended.
	EXTERNAL		
	Transport for London	This stakeholders comments are set out in full in Appendix 10 of this report. However, no overall objection subject to working closely with TfL on required measures and the imposition of conditions etc.	Comments noted and addressed in additional information submitted, and by conditions and s106/278 HoTs set out in the report.
	Thames Water	This stakeholders comments are set out in full in Appendix 15 of this report. However, no objection subject to conditions.	Comments noted and conditions imposed as recommended.
	Environment Agency	This stakeholders comments are set out in full in Appendix16 of this report. However, no objection.	Comments noted.
	Council for British Archaeology	A revised scheme. Our previous objections in terms of loss of heritage assets and destruction of the street scene remain. Although the new stadium may be claimed to outweigh these disadvantages on the grounds of community use / benefit, it would be possible to provide a new stadium without destroying local character. The scheme therefore remains	Comments noted.

		unacceptable.	
	Historic England – Archaeology	Having considered the proposals with reference to the Greater London Historic Environment Record and/or made available in connection with this application, conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.	Comments noted.
	Historic England	This stakeholders comments are set out in full in Appendix 8 of this report.	Comments noted and responded to in detail in the Heritage section of this report.
	Haringey Irish Cultural and Community Centre	Supports the application for a new stadium. The Centre relies on the football club for customer trade. The new stadium creates significant benefits for the local community and public in general. The new public realm welcome as people would likely stay longer within the area.	Comments noted.
	Lea Valley Estates	Supports the scheme as it will benefit the local community with trade, leisure, health and general quality of life. Creating the opportunity for people to invest in the area – the sports facility, including NFL will also provide economic benefit which extends beyond premiership football.	Comments noted.
	London Fire and Emergency Planning Authority	Following the submission of revisions - no objection and are satisfied with the proposals for fire fighting access.	Comments noted.
	Lord Triesman	Supports the planning application for a new stadium for the benefits it will bring for the community e.g. job opportunities and businesses.	Comments noted.
	National Football League (NFL)	Supports the scheme to meet the growing enthusiasm for American Football and will deliver huge benefits for local community and businesses.	Comments noted.
	Natural England	This stakeholders comments are set out in full in Appendix 17 of this report. However no objection.	Comments noted.
	Historic Buildings and Conservation Committee	Objects to the scheme on scale and unsuccessful public realm works	Comments Noted
	Haringey Mencap Ltd	Supports the proposed development.	Comments noted.
	UEFA	Supports the proposed development, which will deliver huge benefits for local people and businesses.	Comments noted.
	Tottenham Hotspur Supporters Trust	Supports the proposed development as it will provide new sport in NFL, a quality design, and provi9de benefits	Comments noted.

		to supporters, local people and the area generally.	
	Tottenham Conservation	This stakeholders comments are set out in full in Appendix 21 of this report. Objects to the proposed development as it results in the demolition of buildings which should be retained.	Comments noted.
	Tottenham Conservation Area Advisory Committee	This stakeholders comments are set out in full in Appendix 18 of this report. Objects to the proposed development as it results in a loss of buildings and will adversely impact on the Conservation Area.	Comments noted.
	Tottenham Business Group	This stakeholders comments are set out in full in Appendix 22 of this report. Objects to the scheme on loss of building, design scale etc out of keeping in context of the surrounding area, impact on parking and transport generally – impact on the conservation area.	Comments noted.
	The Victorian Society	This stakeholders comments are set out in full in Appendix 19 of this report. Objects to the scheme on loss of buildings, design scale and impact on the conservation area.	Comments noted.
	Our Tottenham	Objects to the scheme. Raise a number of points and make recommendations but not directly objecting to the proposed development.	Comments noted.
	London First	Supports the proposed development for the benefits it would provide and for the regeneration of the area generally.	Comments noted.
	London Borough of Waltham Forest	No objection to the proposed development.	Comments noted.
	London Borough of Camden	No objection to the proposed development.	Comments noted.
	Greater London Authority	This stakeholders comments are set out in full in Appendix 9 of this report. No objection – generally complies with the strategic objectives but the scheme is not fully policy compliant.	Comments noted.
	Barnet, Enfield and Haringey NHS Trust	Supports the proposed development as it will provide improved leisure facilities, job opportunities, new community healthcare facility and regenerate Tottenham.	Comments noted.
	Metropolitan Police	No objection subject to a condition imposed requiring applicant to incorporate secure by design	Comments noted.

		measures.	
	Premier League	Supports the proposed development	Comments noted.
	Newlon Housing Trust	Supports the proposed development	Comments noted.
	North London Chamber of Commerce	Supports the development and the regeneration it will have on the area.	
	Basket Ball England	Supports the proposed development	Comments noted.
	Ahmed Mohammed	Supports the proposed development	Comments noted.
	Ashley Kirby	Supports the proposed development	Comments noted.
	B2B Engage	Supports the proposed development –The proposal provides significant public and community benefits.	Comments noted.
	Eric Palmer	Supports the proposed development	Comments noted.
	Jubed Bashir	Supports the proposed development	Comments noted.
	Lauren Black	Supports the proposal for the clubs participation in and support of young people in the local community.	Comments noted.
	Candy Amsden	In favour of a new stadium but not to decimate North Tottenham. Impact on small businesses, the council housing and the historic local buildings in this locality. Loss of light to its neighbours. .	Comments noted.
	Robert Lindsey Smith	Objects: Effect on local amenities; disruption to local transport. The use for NFL and other events would mean that there would be little respite for local residents during the summer. Loss of light and privacy of neighbours. St Paul's school and the Adventure Playground would be in shadow from the tall residential blocks. The blocks would overlook these two playgrounds, causing child protection concerns. The flats on the south side of Park Lane would also be overlooked. Noise and disturbance resulting from new uses. Effect on vitality and viability of shopping centre. Effect of the proposal on the character and appearance of an area. It is not acceptable to lose the three locally listed building on the High Road. There is no social housing in this application.	
	Catherine Collingborn	Objects - Loss of three locally listed historic buildings. 3. The scale and height of the	Comments noted.

		development would cause loss of light and shadowing, dominate the skyline, out of scale and character with the High road. It would set a precedent for similar developments elsewhere in the borough. It will not offer housing to those who really need it.	
	Margaret Burr	Objects - Loss of three listed buildings	Comments noted.
	A Fairer Chance Community Interest Company Ltd	Supports the proposal for the benefits that it would provide.	Comments noted.
	Alex Skorecki	Comment: The plans should incorporate more solar power or other renewable energy.	Comments noted.
	Allen O Shaughnessy	Comment – no support or objection significant improvement is needed to the rail service to this area. Reliability of the line needs to improve.	Comments noted.
	Andrew P	Supports the proposed development and the benefits it will have for the local area.	Comments noted.
	Andy Hoare	Supports the proposed development	Comments noted.
	Anne Duffy	Requests to be kept up to date with the planning application	
		Supports the proposed development	Comments noted.
		Supports the proposed development	Comments noted.
	4 Anonymous	Objects on demolition of listed buildings	Comments noted.
	10 Anonymous	Supports the proposed development	Comments noted.
	2 Anonymous	Neither objects or supports the proposed development	Comments noted.
	Barnet Southgate College	Supports the proposed development for what benefits are proposed	Comments noted.
	Bill Brown	Supports the proposed development	Comments noted.
	BL Wheatley	Supports the proposed development	
	Bob Hyde	Supports the proposed development	Comments noted.
	Bob Joseph (x 2)	Neither objects or supports then a second email received supporting the proposed development	Comments noted.
	Bob	Supports the proposed development	Comments noted.
	Brian Daly	Supports the proposed development	Comments noted.
	Brook House Primary School	Supports the proposed development for the benefits that it would deliver for the local community.	Comments noted.
	Catherine Sutle	Objects to the demolition of buildings	Comments noted.
	Christiana Flynn	Supports the proposed development for the benefits that it would deliver for the local community.	Comments noted.
	Christina Protz	Objects to the demolition of buildings and the scale of the proposed	

		development.	
	Colin Hall	Supports the proposed development	Comments noted.
	Connifers Care	As a local care provider, supports the proposed development as the club works and supports the care facility.	Comments noted.
	D, Dwoob	No objection to the proposed development	Comments noted.
	Danny Blanchflower	Supports the proposed development	Comments noted.
	David Cracknell	Generally supports the scheme but objects to the loss of buildings and general upheaval in terms of noise and impact on transport movement / parking that will result from construction etc	Comments noted.
	David Matzdorf	Supports the proposed development	Comments noted.
	David Spanu	Objects to the scheme and the stadium should be built elsewhere.	Comments noted.
	Children's and young person's Services	Supports the scheme for the benefits that would be provided for young people.	Comments noted.
	Gladsmore Community School	Supports the scheme for the benefits that would be provided for young people and the general regeneration of the area.	Comments noted.
	Epping Forest College x 3 representations	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area which will benefit local businesses. Club and facilities support the students.	Comments noted
	Haringey Sports Development Trust	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area.	Comments noted.
	Haris Setyo Utomo	Supports the proposed development	Comments noted.
	Hiremech Ltd	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area which will benefit local businesses.	Comments noted.
	IPS LLP	Supports the scheme which will be beneficial for the local area.	Comments noted.
	J Baker	Objects to the proposed development on the loss of buildings.	Comments noted.
	James Reiff	Supports the proposed development	Comments noted.
	Jenny	Neither supports nor objects but suggest the club be relocated to an industrial area.	Comments noted.
	Joyce Rosser	Objects as it does not meet targets for renewable energy	
	Jubed Bashir	Supports the proposed development	Comments noted.
	Julie K Wilkinson	Supports the proposed development	Comments noted.
	Karin Lock	Objects on design, impact on amenity	Comments noted.

		and loss of buildings	
	Keith Eldridge	Supports the proposed development	Comments noted.
	Kevin Field	Supports the proposed development	Comments noted.
	Kyriacos tryfonos	Objects on design, impact on amenity and loss of buildings	Comments noted.
	Marina	Supports the proposed development	Comments noted.
	Mark Serlin	Objects on grounds of lack of renewable energy measures.	Comments noted.
	Mark	Supports the proposed development	Comments noted.
	Mary Powell	Change the character of the area, loss of buildings and businesses, increase in noise and transport.	Comments noted.
	Matthew Koushi	Supports the proposed development	Comments noted.
	Michael Cordwell James	Neither supports nor objects to the proposed development – comments that there should be more sustainable measures.	Comments noted.
	Moira Jenkins	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	C M Hobbs	Objects to the demolition of buildings	Comments noted.
	Neil O'Meara	Supports the proposed development	Comments noted.
	Peter Corley	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	Peter Swan	No objection or support but comments that there should be more sustainable measures within the proposal.	Comments noted.
	Phoebe Swan	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	Quentin Given	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	Richard Allcock	Supports the proposed development	Comments noted.
	Richard Desforges	Supports the proposed development	Comments noted.
	Robert Clark	Supports the proposed development	Comments noted.
	Ruth Schamroth	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	Ruth Tastaban	Objects to the proposed development as there should be more sustainable measures within the proposal.	Comments noted.
	S Bond	Supports the proposed development	Comments noted.
	Samantha Moran	Objects to the proposed development as the stadium is out of character with the local area.	Comments noted.
	Save Britain's Heritage	Objects to the proposed development on grounds of loss of heritage buildings and the adverse impact on the character and appearance of the conservation area.	Comments noted.

	Sophie Severs	Objects on the loss of the heritage buildings and impact on character and appearance of the local area.	Comments noted.
	Steve Pilborough	Supports the proposed development	Comments noted.
	Stuart Matheson	Supports the proposed development	Comments noted.
	Tommy Baily	Objects on the loss of the heritage buildings and impact on character and appearance of the local area.	Comments noted.
	Tottenham Business Group	Objects on loss of heritage buildings, loss of parade of shops / buildings, stadium will be overbearing, out of character and will affect the setting of listed buildings, loss of sunlight and daylight, unacceptable impact on transport, movement and parking, will blight nearby business and is not the centre of regeneration for Tottenham	Comments noted
	Whittington Health NHS Trust	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area which will benefit local businesses.	Comments noted.
	William Severs	Objects to the proposed development on the loss of buildings.	Comments noted.
	Gareth Jones	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area which will benefit local businesses.	Comments noted.
	P Johnson	Objects to the proposed development on the loss of buildings.	Comments noted.
	Kevin Field	Supports the proposed development	Comments noted.
	Oluremi Abati	Supports the scheme for the benefits that would be provided local population and the general regeneration of the area which will benefit local businesses.	Comments noted.
	Catherine Collingborn	Objects to the scheme as it does not meet 20% renewable energy measures and should seek to provide a district energy centre	Comments noted
	Dermot Barnes	Objects as the scheme does not meet sustainable development principles and fails to deliver adequate renewable energy measures. Also, the councils commitment to reduce carbon emissions by 40% by 2020 wholly undermined by the scheme	Comments noted
	Mustafa Suleman	Objects to the loss of listed buildings	Comments noted
	Nadhir Choudhury	Supports the stadium and will regenerate the area	Comments noted
	Robyn Thomas	Objects as the renewable energy measures not adequate and should	Comments noted

		be providing district energy centre	
	Jeremy Cassidy	Energy, renewable and efficiency all inadequate and the developer should be improving the measures	Comments noted
	Roru Lulham	Supports the proposed development	Comments noted
	Bryan Wood	Supports the proposed development and the enabling of learning towards obtaining 'football badges'.	Comments noted
	Bushra Aden	Neither supports or objects but supports the wider benefits that the proposal will provide	Comments noted
	Katrina Heal	Neither but supports the plans	Comments noted
	Louise O Mahony	Supports the proposal and the benefits it will bring with the NFL and regeneration and opportunities locally	Comments noted
	Sophia Bowes	Supports the proposed development	Comments noted
	Angela Demetriou	Supports the proposed development and the opportunities it will provide	Comments noted
	Anna Jozefowicz	Supports the proposed development and the regeneration that will occur	Comments noted
	Arther Chance	Objects to the proposed development – a 'pinch point' created, attract too many people, loss of listed buildings	Comments noted
	Bruce Goddard, Head Teacher, Highlands School	Neither objects nor supports the proposed development – the club provides facilities for the pupils which are welcomed.	Comments noted
	Cara Jenkinson	Objects to the proposed development on grounds of inadequate energy measures	Comments noted
	George Hyslop	Supports the proposed development for the facilities that are offered for the community	Comments noted
	Ilja van Holsteijn - The Johan Cruyff Foundation	Supports the proposed development for the significant benefits in terms of regeneration and sports / education facilities that will be provided	Comments noted
	Jess Khanom	Supports the proposed development	Comments noted
	Kate Turnpenney – Headteacher Wilbury Primary School Wilbury Way Edmonton	Supports the proposed development for the support and training that the club provides to support the school	Comments noted
	Lucy Peirce	Neither support nor objects the proposed development but praises the impact on regeneration and opportunities that will arise.	Comments noted
	Raluca	Supports the proposed development	Comments noted
	Sarah Howe	Supports the proposed development for the educational benefits and opportunities generally for local people	Comments noted

	Tan Radan	Supports the proposed development for the regeneration and wider benefits this will provide	Comments noted

Review of the Tottenham Hotspur Transport (THFC) proposal

Introduction

The proposed site is located to the north of the existing stadium and is enclosed by recently implemented supermarket and technical college to the north, to the east by Worcester Avenue, to the west by the A1010 High Road and to the south by Park Lane. This section of the High Road has a public transport accessibility level of 4/5 which is medium /high and is part of the strategic road network (SRN). There are ten bus routes serving this area: 149, 279, 259, 341, 476, 123, 243, 318, W3 and 349 with bus stops on the High Road and on Northumberland Park. There are two national rail stations within reasonable walking distance of the site; White Hart Lane station is approximately 450m to the west and provides access to services on the Seven Sisters branch of the Lea Valley Line. Northumberland Park station is approximately 600m to the east and provides access to services on the West Anglia main line. The closest underground station is Tottenham Hale on the Victoria Line, approximately 2.2 km from the stadium; Seven Sisters is 2.3km to the south of the stadium. Although Tottenham Hale station is closer to the stadium than Seven Sisters station most spectators currently use Seven Sisters Station as it perceived to be closer, is more accessible by foot and has direct bus services.

This site has planning permission for a mixed-use development to provide a 56,250 capacity stadium, including: a supermarket, 150 bed hotel, a museum, offices and 200 residential units. There were two subsequent planning permissions HGY/2011/2350 and HGY/2011/2351 for additional floor space in the northern phase of the development including: offices 5,666 sqm (ancillary to the club use) and education space, 3,238 sqm. There was an increase in floor space in the southern development including (6,650 sqm for health care facility, 6,000sqm health club and an increase in the number of residential units from 200 to 285 residential units. The northern development has been constructed and is occupied. The applicant is seeking to amend the stadium and the southern development including the following changes:

1) Increase the capacity of the stadium to 61,000 seating capacity, multi-purpose stadium which includes NFL, concerts and Sky Walk' allowing visitors to climb the exterior of the stadium, increase the stadium car parking spaces from 319 to 822 including 60 designated blue badge spaces and 90 fully accessible car parking spaces. The increase in the car parking spaces will provide additional blue badge spaces.
2) Increase the number of residential units from 285 to 580 residential units, including 270 car parking spaces.
3) A 180 bed hotel and 49 serviced apartments, including 76 car parking spaces
4) Health centre 2,000sqm. The size of the health centre has reduced from 6,500 sqm; this will be accessed via Worcester Avenue. No dedicated car parking spaces will be provided for this element of the proposal.
5) The Tottenham Experience 4,311 sqm which includes club store, museum, cinema, cafe, ticket office, and skywalk changing rooms and reception.
6) Extreme sports facilities of 2,100sqm including climbing wall, scuba-diving tank and sports performance activities. No car parking is provided for this element of the development.
7) New community/ office use of 3,897 sqm within the southern development. No car parking is provided for this element of the development.

There have been a number of changes to the local transport infrastructure since the 2010 application and other transport improvements planned to be implemented between 2015 and 2018 when the stadium is proposed to be in full operation, a summary of the changes are outlined below:

1) The completion of the Victoria Line upgrade, which has provided faster and high frequency trains. A new timetable to be implemented in 2016 will see all trains running

to Walthamstow Central via Tottenham Hale. This will increase the capacity at Tottenham Hale for spectators pre-events who will walk to stadium and post events heading east or travelling to the south

2) White Hart Lane which was formally the Abellio Greater Anglia line has been taken over by TfL and is now part of the London Overground network. This will include new rolling stock from 2018 which will increase the capacity. There is also a proposal to remodel the station to provide better connectivity to the High Road (stadium) and improve platform loading as loading of the platform using the current layout is restricted by the stairs which are 3 metres wide.

3) Upgrade of Tottenham Hale station and bus interchange, this combined with the removal of the Gyratory and the Green Link has enhanced the option of Tottenham Hale as an alternative to Seven Sisters station, as it has better connectivity to the High Road and is closer to the Stadium than Seven Sisters Station.

4) The Mayor's Cycling Super Highway 1 (CS1) is currently being implemented and will be competed in 2016. The new cycle route will provide better north/south cycling connectivity, the proposed alignment is via Church Lane which will aid cyclists to avoid the congestion on the High Road on a match day.

The transport impact of the development has been assessed in the context of the Council's Saved UDP Policies, Haringey's Local Plan Strategic Policies 2013-2026, the 2015 London Plan (FALP) Policies as below:

M9: CAR-FREE RESIDENTIAL DEVELOPMENTS
Proposals for new development without the provision of car parking will be permitted in locations where:
a) There are alternative and accessible means of transport available;
b) Public transport accessibility is good; and
c) A controlled parking zone exists or will be provided prior to occupation of the development.

7.19 Residential developments without car parking provision are only likely to be viable where there are alternative and accessible means of transport available, in particular a good level of public transport accessibility and where a Controlled Parking Zone (CPZ) is in existence or planned within the timescale for the proposed development. Appropriately located on-site disabled parking will be required for wheelchair accessible homes. In addition people with disabilities may also be eligible for a parking permit. Within existing or planned CPZ's residents of car-free developments will not be eligible for residential permits. Although residents of car-free housing are unlikely to walk a long distance from their home to access their parked car on street without parking controls, the Council will seek, in the longer-term, extensions to existing controlled parking zones. Where public transport provision can be improved to increase the levels of public transport accessibility and facilitate car-free residential development the Council may seek to augment provision through a section 106 agreement.
7.20 The construction of new residential developments without car parking would support Council policies to reduce car dependency and the encouragement of other modes of transport. The Council will negotiate viable means to implement car-free developments where it is appropriate.

M10: PARKING FOR DEVELOPMENT
Development proposals will be assessed against the parking standards set out in Appendix 1. Proposals that do not meet these standards will not normally be permitted.
Parking requirement will be assessed on an individual basis as part of the Transport Assessment in cases where this is deemed necessary according to Policy UD1.
7.21 As PPG 13 Transport notes [para 49], "The availability of car parking has a major influence on the means of transport people choose for their journeys". A limitation on the provision of private non-residential (PNR) parking for new development can help to restrain car use. Haringey Unitary Development Plan: July 2006 117 7.22 The Council will apply its parking standards to restrain car use, to reduce congestion, to improve road safety, to give priority to essential users and people with disabilities, to improve the environment, to improve local accessibility and to encourage sustainable regeneration.

Haringey's Local Plan Policy SP7 which focuses on promoting sustainable travel and making sure all development is properly integrated with all forms of transport, in line with the Government's transport objectives set out in section 4 of the NPPF and the Mayor of London's strategic transport approach in the London Plan.
London Plan Policy 6.1 Strategic Approach, 6.3 Assessing Effect of Development on Public Transport capacity, 6.7 Better Streets and Surface Transport, 6.9 Cycling, 6.10 Walking, 6.11 Smoothing Traffic Flows and Tackling Congestion, 6.12 Road Network Capacity, 6.13 Parking

Non-Event Day Assessment

This application will be assessed in two main sections: Non-event days and Event days. This section comprises the Non-event day activities which include (residential development, Hotel, Extreme Sports, Tottenham Experience, Health Centre and the Sky Walk).
As above the planning permission was granted for changes to the southern development including college of 6,650 sqm, health care facility of 6,000 sqm and a health club of 2,400 sqm. In addition the applicant has approval to increase the numbers of residential units from 200 to 285; the table below shows cumulative in/out trip rates generated by the central (stadium non-event day) element of the development and the southern element of the development between the base (previous commercial light industrial), the 2010 application (HGY/2010/1000) and the 2011 (HGY/2011/2350 and HGY/2011/2351) applications.

Trip Generation
Trip generation table blow which indicates the AM, PM and Saturday peak trips for the site as exists in 2010m the first application in 2010 (HGY2010/1000) and the changes in 2011 as part of (HGY/2011/2350 and HGY/2011/2351)

		2010 Base			**Approved 2010**			**Approved 2010/12**		
	Modes	AM	PM	Sat	AM	PM	Sat	AM	PM	Sat
Middle (Stadium)	**Vehicle**	143	153	12	219	280	99	219	280	99
	Pedestrian	0	0	0	52	63	30	52	63	30
	Public Transport	0	51	0	191	298	63	191	298	63
Southern Development	**Vehicle**	165	244	271	35	24	245	151	112	390
	Pedestrian	55	0	83						
	Public Transport	108	338	177	78*	266*	604*	236 *	423*	630*

**Pedestrian and public transport trips combined.*

This application is seeking to change the use of some of the existing approved floor areas as well as creating additional floor areas as part of the Southern Development. The trip generation methodology is a hybrid trip generation methodology, which utilises some of the existing trip rates from the TRAVL database from the previous applications. This includes the hotel, and the health centre. The applicant's transport consultant Tim Spencer and Co has proposed calculating the trip rate for the Stadium Conference, Tottenham Experience, Sky Walk, Extreme Sports facility from first principles (yearly tips forecasted using the business averaged over months days and peak hours). These elements of the proposal have been forecasted to generate annual visitor's numbers of: Conference facility [81,180], museum, stadium tour, Tottenham Experience and club store [120,000], Sky Walk [96,600] and Extreme sports [100,000]. We agree that some elements of the development are unique and it will not be possible for the applicant's transport consultant to forecast trip rates based on sites from TRICS and TRAVL trip prediction database. The development will also include some 3,797 sqm of flexible community or B1 use. This aspect of the development has been assessed based on B1 use which represents the worst case scenario. This element of the development will not have access to dedicated off street car parking spaces and will have to utilise the 56 pay and display car parking spaces on Worcester Avenue which will have a time limitation. This element of the development has been assessed based on first principle using employee research surveys completed in 2011. We have considered that although the trip generation methodology is a departure from the standard approach using sites from the TRICS data base with modal split data from the 2011 census data, the survey methodology is acceptable as this element of the proposal will not have any dedicated car parking spaces. It is assumed that the proposed office will have up to 250 employees; the car mode share is forecasted to be 4% during the peak periods associated with car passengers, (taxis), as no dedicated car parking spaces will be provided for employees. The applicant's transport consultant has forecast the trip rates for the residential aspect of the development from first principle based on surveys of sites located in Islington in Holloway Road. Although these sites are in inner London, we consider these are acceptable given the high PTAL rating for the site and restricted on-site parking of 0.47 spaces per unit including wheelchair accessible car parking.

The remainder of the development, hotel and health centre trip generation has been forecasted using the trip rates using sites from the TRAVL trip generation database agreed as part of the previous approved application.

The trip generation during the peak periods (AM and PM) have been distributed between 7am-9am and from 4pm-7pm. There will be a total of 1,871 two-way persons trips during the AM peak (738 in and 1133 out) and 2,536 two-way trips during the evening peak periods (1420, in and 1112 out). The table below shows the AM and PM peak person's trip generation during the network peaks (8am-9am and 5pm-6pm). Based on the hybrid trip generation methodology the non event day element of the application is expected to generate the following peak hourly trips:

Expected All Mode Trip Generation

Activity	AM Peak Hour		PM Peak Hour	
	In	**Out**	**In**	**Out**
Conference/ Banqueting Tottenham Experience Sky Walk Extreme Sports	165	83	83	165
Health Centre	45	28	23	46
Office B1/Community/ D1 Use	108	17	13	77
Hotel	24	72	77	31
49 apartments	5	28	23	12
585 Residential Units	65	335	272	145
Total	**412**	**563**	**491**	**476**

Vehicular Trips (Car Driver Trips)

Activity	**Peak Hour AM**		**Peak Hour PM**	
	In	**Out**	**In**	**Out**
Conference/ Banqueting Tottenham Experience Sky Walk Extreme Sports	17	8	8	17
Health Centre	17	8	8	8
Office B1 Community D1 Use	4	1	1	3
Hotel	2	15	27	6
49 apartment lets	1	2	1	1
585 Residential Units	8	28	18	13
Total	**49**	**62**	**63**	**48**

The previously approved scheme(HGY/2011/2350 and HGY/2011/2351) forecasted trip generation of 151 in/out trips in the AM peak period and 112 in/out trips during the PM peak period related to the southern development. The current proposal would generate 111 in/out trips during both the AM and PM peak period with the majority of the additional trips would be by public transport. There would be a reduction in the number of vehicular trips generated by the revised development when compared to that of the 2012 approved development (HGY/2011/2350 and HGY/2011/2351). The stadium element of the proposal is forecasted to generate additional vehicular trips based on conference and other events utilising the stadium car park. The revised TA proposes restricting access to the stadium car park to all but essential conference and event organisers, with all other visitors utilising the 56 shared pay and display car parking spaces on Worcester Avenue. This will suppress the car mode share. The use of the stadium car park on non-event days will be restricted and reviewed by way of a S.106 obligation as part of the parking management plan. We have therefore considered that as the proposed non event day aspect of the development will have limited car parking provision, with dedicated car parking only provided for the residential, and hotel aspects of the development combined with the recently implemented all day Controlled Parking Zone which will have to reviewed before the occupation of the Southern Development, the trip generation methodology is considered acceptable. In addition the evidence provided as part of the transport assessment has demonstrated that there has been a reduction in the annual/ daily flow of traffic on the highways network (Tottenham High Road) since 2010, with a reduction in the average day flow next to the stadium (High Road) by 18% between 2001 to 2011 (16,708 to 13,583). Whilst we agree that the supermarket is currently under trading and the car mode share trip generation forecasted has not occurred to date, it is our opinion that the car mode share is unlikely to increase substantially beyond the current levels in the future given the proposed redevelopment NDP residential development, High Road West and Northumberland Park, our experience from previous retail impact assessment have demonstrated that the future trips (trade) generated by the supermarket is most likely to originate locally given the proposed increase in the number of residential units from the above sites.

Impact on Public Transport

We have assessed the impacts of the increase in public transport/ pedestrian trips and the impact it would it would have on the local transport network. The applicant's transport consultant has forecasted the trips that will be generated by the Southern Development including the non match day stadium activities, 32% of the trips will be via White Hart Lane, 13% via Northumberland Park station, 30% via bus to the Victoria Line and 24% by bus as the main mode, we have considered that the proposed modal split is accessible and will have to be supported by a Travel Plan to be secured by way of S.106 agreement.

The development will generate some 1377 two way public transport trips over the 3 hour AM peak period and 1,928 two way trip public transport trips over the 3 hour PM peak period, during the AM peak hour the development will generate 783 public transport trips and 754 peak hour trips during the PM peak hour period; given the distribution between the various modes of public transport and including the 13% of trips via Northumberland Park we have considered that with the improvements planned in public transport infrastructure in the local area, the proposed development would not adversely impact on the public transport system(buses, underground and rail).

Based on the forecasted trip generation the cycle mode share of trips account for some 5.2% of trips during the AM peak period and 3.8% of trips during the PM peak period, 98 and 96 cycle trips respectively we have considered that given the reduction in the number of car parking spaces provided as part of the development the forecasted cycling mode share should be much higher. We will therefore require the applicant to provide a cycling strategy for the non match day aspect of the development. The cycling strategy should review the existing cycling infrastructure, and provide measures which seek to increase the cycling modal split for the entire development such as visitors' cycle parking and changing rooms, showers and lockers for staff. These measures are to be reviewed annually as part of the Travel Plan.

Car parking and cycle parking provision

The applicant is proposing to provide 270 car parking spaces for up to 580 residential units which equated to some 0.47 car parking spaces per unit. The proposed car parking provision is in line with the 2015 London Plan (FALP), and Haringey's Saved UDP Policy M10. We will require 20% of the entire car parking provision to have active electric vehicle charging points with a further 20% passive provision. In addition the developer will be required to provide 1 space per wheelchair accessible unit. The parking allocation including the allocation of car parking to wheel chair accessible units must be done via a parking management plan to be approved by the Transportation Planning Team.

Cycle parking will be incorporated in each of the 4 towers, Tower A will have up to 167 units including 4 studios, 69 one bed units, 88 two bed units, 6 three bed units and a total of 261 cycle parking spaces. Tower B will have a total of 91 residential units, 6 studios, 49 one bed, 30 two beds, 6 three beds and a total of 127 cycle parking spaces. Tower C will have 231 units, 4 studios, 101 one bed, 120 two beds, 6 three beds and 357 cycle parking spaces. Tower D will have 91 units, with 6 studios, 49 one bed, 30 two beds and 6 three beds and 127 cycle parking spaces. In addition there will be 5 three bed maisonette houses, which will have their own cycle parking. The number of cycle parking spaces is largely in line with the London Plan, however the applicant has not proposed the provision of visitor cycle parking. We will require detail of the numbers and location of visitors' cycle parking to be submitted as part of the Travel Plan. We will also require details of cycle parking, proposed method of security of cycle parking provision, allocation of cycle parking spaces and long term maintenance strategy of the cycle parking areas and provide short stay cycle parking in line with the London Plan, to be secured by way of S.106 agreement.

Hotel and serviced apartments

The Hotel will have 180 beds and 49 serviced apartments are proposed. The applicant has proposed providing 76 car parking spaces for this aspect of the development. We consider the parking provision is high considering the good public transport accessibility of the site. The London Plan considers that in locations with PTAL of 4-6 parking provision should be limited to operational needs and parking for disabled persons. We will also require the developer to include 10% wheelchair accessible and 10% of the spaces provided to have electric charging points with a further 10% passive provision car parking. In relation to the 76 car parking spaces proposed for the hotel and serviced apartments, the developer will also be required to submit a parking management plan, which will limit the use of these car parking spaces for operational use only and should include details on how car parking will be allocated and managed. The London Plan requires the developer to provide cycle parking at 1 space per 20 beds for long stay and 1 space per 50 bed for short stay. The applicant will be required to provide the above parking management plan and cycle parking as part of the Travel Plan to be secured by way of a S.106 agreement.

Health Centre

The application will include a Health Centre of some 2,000 sqm. The health care facility will serve mostly local people and will generate most of its trips locally by walking, cycling and public transport. The applicant has not proposed providing parking for this element of the proposal. However, the revised highways layout will include 56 pay and display car parking spaces including 8 disabled car parking spaces on Worcester Avenue, which can be used by residents accessing the proposed healthcare facility by car. The applicant has not provided details of the cycle parking spaces to be provided. This will have to be secured by way of condition as part of the Travel Plan.

The Tottenham Experience

The Tottenham Experience which includes the megastore, museum, cafe, cinema, ticket office and Sky Walk will not have any dedicated car parking spaces. Visitors will make use of some of the pay and display car parking spaces on Worcester Avenue. The applicant will be required to provide cycle parking in line with the 2015 (FALP) London Plan, to be secured as part of the Travel Plan by S.106 agreement

Conference/ Banqueting and other stadium non-match day related activities

Parking for these activities will be provided in the stadium car park which has some 822 car parking spaces including 90 wheel chair accessible car parking spaces. However, it is proposed that the use of the stadium car park will be restricted to essential guests only, to reduce travel by car. We will therefore request as part of the car parking management plan that any such event is not provided with car parking in excess of that assessed as part of the 2010 planning application which assessed car parking relating to the stadium central area of some 219 in/out movement during the AM peak periods. We would therefore seek to cap the level of parking used for conference and events to essential organisers and visitors only, (not in excess of 50) to suppress the car driver mode share of trips generated by conferences which are not classified as major event car parking spaces unless trip generation and junction modelling analysis is provided to demonstrate that a high percentage of parking allocation can be accommodated on site without having any impact on the transportation and highways network.

Event Day Assessment

This section will review the proposed increase in the capacity of the stadium from 56,250 to 61,100 and 10 additional non football sporting events per year such as NFL football and 6 non-sporting events such as concerts. The applicant has planning permission for a stadium with a capacity of 56,250. The impacts of the previous stadium on the transportation and highways network has already been assessed as part of planning application HGY/2010/1000, and mitigation agreed as part of the S.106 agreement. Some of these measures have already been implemented including the first phase of the new event day CPZ. This application is seeking to increase the capacity of the stadium by 8,750, some 16.75% above the 2010 approved scheme.
Given the length of time since the 2010 approved scheme and the improvements in public transport infrastructure planned to be implemented before 2018, or has already been implemented, the applicant's transport consultant has optimised the use of public transport which in turn will reduce the need for travel by private car and maintain the key assumption of the HGY/2010/1000 transport strategy, which assumes that the increase in the capacity of the stadium will not result in increase in the car mode share and car parking demand generated by the new stadium in the area surrounding the site.

Modal Split

The table below shows a summary of the existing and proposed modal split targets; car use accounts for between 39.6 and 45.6% person trips to and from the existing stadium. The applicant has proposed to retain the modal split assumption that underpins the previous event day forecast which assumes that the number of car trips will not increase beyond the existing modal share as a result of increasing the capacity of the stadium (nil detriment effect model)

The developer's event day TA has proposed reducing the number of trips by car on a match day from 15,609 person trips to 14,030 person trips post match as a result of implementing the revised event day control parking zone. The proposed reduction in person trips would result in some 658 less car trips. We have reviewed the proposed estimated modal split targets and the resultant impact on the various travel modes in the subsequent sections.

Existing and forecasted modal split for Home and away Supporters

	Existing Arrival		Proposed Arrival		Existing Departure		Proposed Departure	
Mode		%	People	%	People	%		%
coach	363	1.0%	915	1.5%	363	1.0%	915	1.5%
local Bus	3993	11.0%	6405	10.5%	2178	6.0%	4880	8.0%
Inter SS*	2360	6.5%	3660	6.0%	2360	6.5%	4270	7.0%
Inter TH*	182	0.5%	2013	3.3%	182	0.5%	1830	3.0%
Taxi	363	1.0%	1037	1.7%	363	1.0%	915	1.5%
Walk	726	2.0%	1830	3.0%	726	2.0%	1830	3.0%
Cycle	363	1.0%	610	1.0%	363	1.0%	610	1.0%
Rail from WHL	8531	23.5%	12810	21.0%	7369	20.3%	12200	20.0%
Rail from NP	4175	11.5%	9638	15.8%	3521	9.7%	8540	14.0%
Walk to, SS tube	3630	10.0%	6893	11.3%	5227	14.4%	6405	10.5%
Walk to TH tube	363	1.0%	3172	5.2%	581	1.6%	5795	9.5%
car	13794	38.0%	11895	19.5%	15609	43.0%	14030	23.0%
Motor Cycle	0	0.0%	0	0.0%	0	0.0%	0	0.0%
Shuttle Bus	0	0.0%	5795	9.5%	0	0.0%	4880	8.0%
Total	36300	100.0%	61000	100.0%	36300	100.0%	61000	100.0%

**note that Inter SS (interchange Seven Sisters to Victoria Line for Rail via White Hart Lane) and Inter TH(interchange Tottenham Hale to Victoria Line via Rail form Northumberland Park).*

The table above shows the home and away supporters modal split target which equates to 61,000 total stadium capacity of which 3,000 spectators are away supporters, 77-80% are forecasted to arrive by public transport. The increase in the capacity of the stadium to 61,000 will make greater use of Tottenham Hale station which is currently not very well used on match day for arrival or departure, with only some 617 spectators using the station on arrival and 763 spectators on departure. In the future situation 7930 spectators are expected to use the station on arrival and 9445 spectators on departure. The transport strategy would provide shuttle bus services as part of the mitigation strategy; two shuttle bus services are proposed - one to Tottenham Hale and the other to Wood Green and Alexandra Palace station. The provision of the shuttle bus service would also reduce the loading pre and post match at Seven Sisters and White Hart Lane stations, as it is forecasted to transport some 3050 spectators to Wood Green and Alexander Palace stations.

Arrival and Departure profile

At present 85% of spectators arrive and depart within 45 minutes of kick off and final whistle respectively, with some spectators leaving before the final whistle. This peak arrival and departure adds to the loading of the public transport system, resulting in longer queuing times at stations and traffic delays and congestion on the local highway network. The applicant has suggested that by providing better facilities at the stadium resulting from better design and post match entertainment, some 30% of spectators (18,300) will arrive at the stadium gatelines early (60-90 minutes before kickoff); with 35.2% of spectators arriving in the local area before a match.
The TA assumes that 30% of home spectators and 5% of away supporters will delay their departure for a minimum of 20 minutes. In our view insufficient evidence has been provided in the Transport Assessment to demonstrate that such a large percentage retention can be achieved post match for mid week events. However given the increase in the capacity of the stadium and the increase in demand on local transport infrastructure, it is likely that fans will arrive in the area earlier in order to ensure that they can enter the stadium before kickoff; in addition the new stadium will include attraction and retention measures. We support the applicant's desire to alleviate the peak loading on the public transport system and request that these attraction and retention measures, proposed as part of the previous planning application are retained as part of the Travel Plan measures.

Walking

White Hart Lane is the closest Station and is 6 minutes walk from the stadium. The distance to other stations are Northumberland Park station [0.8 km], Seven Sisters [2.3 km] and Tottenham Hale [2.2km]. The peak trip generation for walking trips will occur post match on a mid week evening when the spectators exit the stadium for the various public transport modes. The crowd flow and dispersion of spectators exiting the stadium has been modelled by the applicant. The proposed footways are expected to be able to cope with the flows in the area immediately surrounding the stadium with the exception of a pinch point outside number 748 and 750 High Road which reduces the footway width to between 2.2-2.6 metres. This forces spectators out into the bus lane. Although this issue has not resulted in any accidents the applicants transport consultant has highlighted this as a potential safety issue given the increase in the number of spectators. We have asked the applicant to explore a range of mitigation measures which will be addressed as part the approval of the detailed highways design to be agreed as part of the S.278 agreement and the Event Management Plan to be agreed prior to the occupation of the new stadium by S.106 agreement.

The Transport Assessment suggests that post match there will be some 12,810 spectators walking to the Victoria Line, Seven Sisters (6,710) and Tottenham Hale (6,100) station, with 14,945 spectators walking to the local rail stations, White Hart Lane (7,930) and Northumberland Park (7,015), we have considered that the proposed forecast is reasonable on balance and will have to be supported by a

communication strategy which advises spectators of the queuing times at the various interchanges to achieve the proposed distribution, otherwise as White Hart Lane is the closest station more spectators will choose to use that station resulting in longer queuing times. A communication strategy and live feed (20 minutes delayed queuing) at the various public transport interchanges are to be secured by way of a S.106 agreement as part of the communication strategy.

The applicant has submitted a revised PERS (Pedestrian Environment Review System) audit of the five main walking routes to and from the local transport interchanges.

- White Hart Lane Station , via, the High Road/ White Hart Lane and via High Road/ Whitehall Street and Love Lane
- Northumberland Park Station via Park Lane and Shelbourne Rod
- Tottenham Hale Station via the High Road, Chesnut Road and Monument Way, Hale Road and Ferry Lane.
- Seven Sisters Station via High Road and Seven Sisters Road
- To the North of the Stadium towards Enfield via the High Road

A map of the walking route can be seen below:



Map of PERS Walking Routes to Local Transport Interchanges

The PERS audit does not include the routes to the coach parking on West Road, Tariff Road, Brantwood Road and Pretoria Road and section via Northumberland Park, Blaydon Walk and a section of Willoughby Park Road. However, we have considered that as the applicants TA is only proposing a 1.5% coach mode share which is some (915 spectators by coach) and the worst case coach demand forecasted is 2% (1,220 spectators maximum), we don't consider that the PERS audit of the coach paring routes are critical to the overall transport strategy; however we will be seeking to sign the routes to the coach parking locations as part of a overall compressive signage strategy of the routes to and from the development be implemented by way of a S.106 obligation.

In respect to the 5 main walking routes identified above, we have reviewed the PERS audit and have concluded that the only route which will require direct mitigation above that which has already been secured as part the approved application HGY/2010/1000. The Stadium to White Hart Lane station route scored very poorly due to lack of resting points, personal safety (lack of CCTV), legibility (lack of route signage), quality of environment (poor surface quality) and directness due to parked cars and bollards.

In addition the PERS audit has identified some other areas where the RAG [Red, Amber, Green] rating is red these areas include:

1) Westside of Bruce Grove/High Road between Bruce Grove station and St Loys Road, and west Side of Bruce Grove between Bruce Grove rail station and Forster Road this area is currently been reviewed by the TFL and Haringey and a funded scheme is being developed to address some of these issues, hence no mitigation is required as part of this application.
2) The PERS audit as part of the review has rated a part of Chesnut Road at its junction with Fairbanks Road, Red using the RAG rating, improvements are planned for this area and £220,00 has been agreed as part of the revised S.106 agreement under planning application HGY/2010/1000.

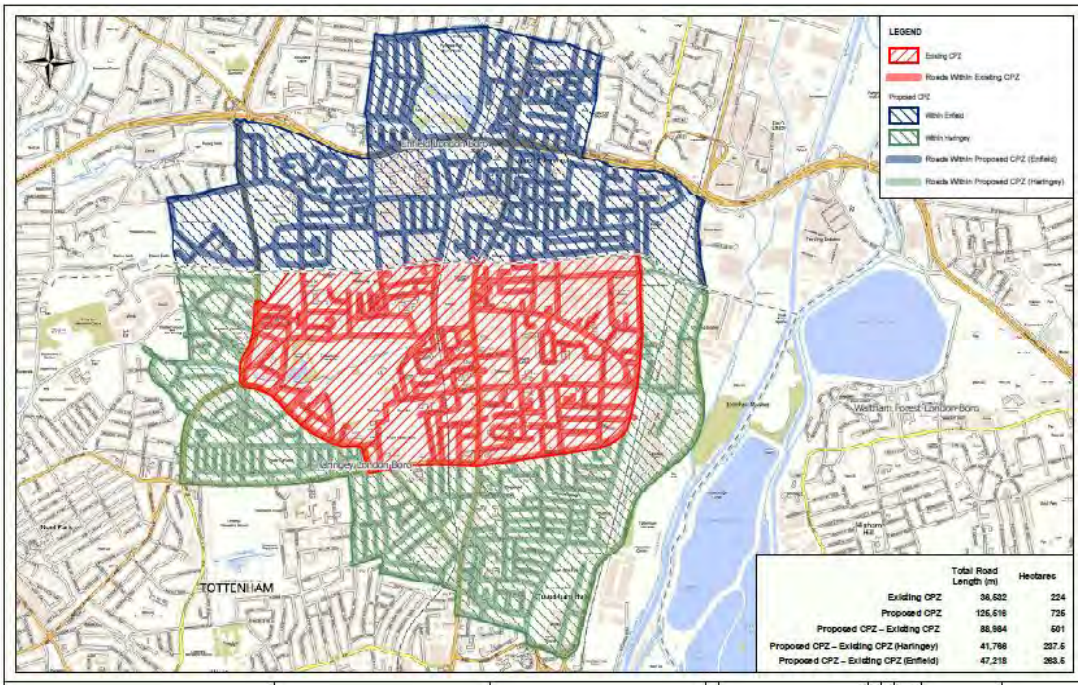
Cycle

The applicant modal split prediction suggests that some 610 people will arrive and depart by cycling. This accounts for 1% of the mode share. We would have expected the proposed mode share to be higher (3% or more) considering that 10,000 of season tickets will be prioritised for local residents combined with the fact that currently some 5% (2900) spectators live within 5km of the stadium. In addition our discussions with Islington and their experience in trying to achieve their cycling modal split target has highlighted inadequate cycle parking as a contributory factor for not achieving Arsenal's cycling modal split target. We will therefore require the applicant to produce a match day cycling strategy which seeks to actively promote cycling to and from the stadium; this should include access to adequate secure cycle parking facility and cycle maps to promote the availability cycle routes.

Match Day Car usage

The existing conditions report suggests that between 37.8%-43.9% of spectators arrive in the local area by car. There is a strategy in place to reduce the number of car parking spaces available and restrict spectator's ability to easily access on street and off street car parking spaces. This combined with the proposed enhancement in public transport infrastructure and event day travel plan measures should make it possible to achieve the proposed car mode share. The key driver to achieve the proposed modal shift is behavioural change as a result of increasing the current match-day CPZ from 221 hectares to around 716 hectares. A map of the proposed CPZ can be seen below. Phase 1 of the revised event day controlled parking zone has been implemented, and the other phases will be implemented before the stadium is completed.

Proposed CPZ



In addition the CPZ will restrict the availability of on street parking close to the stadium and disperse any on-street parking in a larger area. This will result in less congestion within the local area. The proposed expansion of the CPZ beyond the A406 will help to facilitate the free flow of buses and pedestrians along the High Road and the bus diversion route. This will help to reduce the journey time of spectators to and from the stadium. The extension to the west will also help to facilitate the shuttle bus service to Wood Green/ Alexandra Palace.

We have some concerns regarding the increase in the number of car parking spaces in the stadium and the car parking allocated to the Hotel which will be utilised by spectators on an event day. The access and egress via Northumberland Park and Park Lane are located where pedestrian flows will be very high post and pre match. Hence whilst we accept that the transport strategy includes some 22-23% of spectators arriving by car, and the redevelopment of the sites surrounding the stadium will remove some 870 off street car parking spaces, we will need safeguards to be included as part of the event management plan to restrict access to and from the car park before and after games when spectator flows are at the highest (30 minutes pre match and 40 minutes post match). We have also considered that given the proximity of the vehicular access to the hotel car park and serviced apartments, the access will require more stringent management as part of the local area management plan, with access and egress restricted to a minimum of 1 hour pre and post match.

National Rail

We have assessed the proposed modal shift for spectators using rail on arrival and departure and the resulting impact on the local transport network. The revised transport assessment forecast that some 34% of spectators will depart by rail 20% from White Hart Lane and 14% from Northumberland Park Station of whom 35% of those departing from White Hart Lane will interchange at Seven Sisters Station and 21% of those departing from Northumberland Park Station will interchange at Tottenham Hale station. On arrival 21% of spectators will arrive by at White Hart Lane Station and 15.8% to Northumberland Park station. Of the arrivals at White Hart Lane 31% interchanged from the Victoria Line, on the arrivals at Northumberland Park 17% interchanged from the Victoria Line at Tottenham Hale station, this reflects the current match day distribution.

The Event Day TA includes rail capacity analysis for all the local transport interchanges including Northumberland Park, White Hart Lane, Seven Sisters, and Tottenham Hale stations. The analysis includes mid week and weekend pre and post match, taking into consideration the existing and forecasted local demand with a growth factor applied to reflect 2021 forecasted demand at local stations, station configuration and platform capacity which will limit the flow through the station and limit loading of the platform.
The conclusion of the analysis on each interchange is as follows:

Northumberland Park/ Tottenham Hale Station:

For the purpose of the analysis the capacity of the service level based on 4 trains per hour is limited at 85% of the actual capacity as requested by TfL. Between 18:00 and 18:30 there is an increased demand from commuters which impact on the spectators ability to board the first train to travel north towards Northumberland Park Station from Tottenham Hale station. This will increase the pressure on the platform between trains (186 spectators queuing between trains), the TA assumes that the loading on the platform will not exceed capacity, TfL has raised concerns with the vertical circulation within the station and the ability of the existing escalator to clear the platform before the next train and are requesting that a second escalator is implemented as part of the new station proposal. (Discussion with TfL and Spurs)
It is forecasted that post match at Northumberland Park there will be a queue of some 1057 spectators queuing outside the station for the northbound platform. The maximum waiting time for northbound spectators will be 22 minutes from arrival to boarding a train, with total queue duration of 33 minutes. The southbound queue will have 1,099 spectators and will have a maximum waiting time of 26 minutes from arrival at the station to boarding a train with total queue duration of 35 minutes. We have concerns regarding the operation of 12 car services at Northumberland Park station, and will need assurance from Network Rail/rail operator that selective door opening will enable 12 car services to stop at Northumberland Park. In addition the footbridge to access the southbound platform is narrow and will reduce the rate of movement from the southbound platform. The applicant will need to provide a crowd and management plan to support the forecasted increase in passengers expected at Northumberland Park Station. The above forecast is based on use of the existing footbridge to the north to access the southbound platform; this bridge will be replaced as part of the proposed four tracking of the line hence the proposed transport strategy will not be affected by four tracking of the line.
Post match it is predicted there will be some 9,270 spectators arriving at Tottenham Hale, 5,585 will arrive on foot from the stadium, 1,795 will interchange from national rail, and 1,890 will use the shuttle bus service from the stadium to Tottenham Hale. An event day management plan will be required for Tottenham Hale station as access to the station will have to be managed to ensure that no congestion occurs within the station; the queue is forecasted to be a maximum of 900 spectators and will last for 29minutes with a maximum delay per spectator of 6 minutes.

White Hart Lane/ Seven Sisters Station

There will be capacity constraints for northbound services between 18:12 and 19:30 when the background demand is greatest and is combined with the spectators. This will result in fans and spectators waiting between trains at Seven Sisters station and will have a residual demand of some 1,500 passengers queuing on the northbound platform, a station management plan will be required as there is a potential risk to safety, a station management plan should be implemented as part of the event management plan.

Post match there will be some 518 spectators queuing for the northbound service at White Hart Lane with a maximum wait of 12 minutes for a spectator to board a train from arriving in the queue. Southbound spectators will have a maximum waiting time of 29 minute from arriving in the queue to boarding a train. There will be some 2177 spectators in the queue and maximum queue duration of 56 minutes. The area outside the station will require sufficient space to accommodate 2,250 spectators. This will be incorporated as part of the High Road West redevelopment in the long-term. In the interim queuing for the southbound platform will be via Love Lane, Whitehall Street and on the High Road, as above the PERS audit has highlighted that this route will require some improvements which will be secured by way of a S.106 obligation.

Pre-Match the will be 14,620 spectators arriving at Seven Sisters station, 7,208 will exit the station and walk to the ground, 3,702 will interchange to national rail northbound to White Hart Lane 3,350 will interchange to local buses, all the flows in the pre-match situation can be accommodated by the station with the exception of the Northbound platform which will need a management strategy to prevent overcrowding pre-match week days due the background demand by commuters heading north.

In the post match situation 12,993 spectators will depart on the southbound line 6,765 will arrive on foot, 4,338 will interchange from White Hart Lane station and 1,890 will interchange from local bus services. The existing conditions report has highlighted that Seven Sisters station is often closed due to overcrowding. We have concerns regarding the additional demand at this station resulting from spectators travelling from White Hart Lane interchange at Seven Sisters station. These passengers will get priority access to the Victoria Line platform over those spectators/passengers that are queuing at surface access. Access to the station will have to be managed to prevent congestion within the station, the TA forecast that there will be a maximum queue of 1,784 spectators queuing on the High Road outside the station on a weekend the queue is forecasted to last 1 hour with a maximum queuing time to board the tube of 16 minutes.

Buses

Post match the High Road will be closed for a minimum of 30 minutes, as part of the S.106 agreement under planning application HGY/2010/1000. Bus priority measures have been secured to facilitate a bus diversion route via Northumberland Park, Willoughby Lane, Shelbourne Road, and Lansdowne Road. This measure will ensure that bus services are available southbound immediately post match and return to the High Road post match. This will assist in achieving the bus modal split target. In addition the applicant is proposing to implement a shuttle bus service to Wood Green/ Alexandra Palace and to Tottenham Hale stations; the proposed shuttle bus service will account for 8.7% (5,307 spectators) on arrival and 7.7% (4,697) of spectators post match. In our view given that the journey time to Wood Green and Alexandra Palace is only some 15-20 minutes, with a maximum waiting time of 8 minutes, many supporters would chose to use this option post match, instead of queuing for the existing interchanges.

The shuttle bus to Tottenham Hale station will only cater for premium spectators (Box and Club level), the concept of a shuttle bus to Tottenham Hale is welcome. In the event that the modal split target is

not achieved within the first year of occupation the Tottenham Hale shuttle bus service must be enhanced to be open to all spectators.
One of the keys to achieving the shuttle bus frequency is the implementation of the Match Day controlled parking zone not only in Haringey but also in Enfield, this will reduce the number of spectator cars that are parked along the shuttle bus routing. Considering the importance of the shuttle bus in achieving the revised modal split target, we will require a S.106 obligation to secure the shuttle bus service level agreement in discussion with TfL and TfL buses. We will also require as part of the event management plan stewards and crowd management measures at the intersection of Willoughby Lane/Shelbourne Road and Park Lane to ensure that spectators accessing Northumberland Park station do not obstruct the bus diversion route. In addition as part of the shuttle bus strategy we will require stewarding at Tottenham Hale, Wood Green and Alexandra Palace.

The assessment of the other bus routes which includes (149, 259, 279, 349, W3, 318, 341, 476, 123, 243, W4, 34 and 444) concluded that during the pre-match there is a shortfall in bus services which provide a direct link from Seven Sisters station (149, 259, 279 and 349), the shortfall is due to the background demand, it is not possible to provide sufficient bus capacity to mitigate these impacts on an event day, hence the delay that will be experienced by spectators waiting for northbound bus services will encourage the majority of spectators to walk from Seven Sisters, or interchange to rail service, this is reflected in the forecasted modal split with 17.3% of spectators walking or interchanging to travel north to the stadium. We will be seeking signage of the walking route as part of the signage strategy.
Post match these routes also suffer from high demand from spectators resulting in demand exceeding capacity, the closure of the High Road post match will also impact bus frequency. Spectators will therefore choose so walk to the local train/ underground stations. This is reflected in the walking mode share to Seven Sisters and Tottenham Hale.

Coach

The revised Transport Assessment has a maximum forecast of 2% mode share by coach, travel by coach provides an opportunity to reduce the car mode share. Whilst we concede that it is difficult to achieve due to the dispersal in the origins of spectators, we have considered that a coach strategy is required which focus on promoting travel by supporter groups which can be promoted by way of priority ticketing. We will therefore require the applicant to submit a Coach Strategy to achieve a higher coach mode share percentage as part of the travel plan targets. We would therefore recommend that a 5% percentage modal shift is included as a travel plan target and the applicant provide a commitment as part of the S.106 agreement to promote coach service to achieve the model split target.

The existing coach parking is located to the north east of the stadium on West Road. The Transport Assessment has proposed providing coach parking on West Road, Brantwood Road, Tariff Road and Pretoria Road. Our site visit observed that a signage strategy is required to support coach parking location as part of the walking route upgrade.

The Area management plan and the coach strategy should include coach routeing pre and post matches, via Watermead Way and Leeside Road to ease congestion on the High Road and Northumberland Park. Coach parking for Pretoria Road should be routed via the A10, White Hart Lane away from the ground.

Taxi

Taxis account for between 1.5% and 1.7% (915 and 1037) of the modal split prediction. Given the number of spectators and the closure of Park Lane and Worcester Avenue pre-and post match

dedicated taxi bays on a match day will not provide any substantial benefit to taxis. We have considered that taxis will drop off and collect passengers on the High Road where possible, given that the High Road will be closed post match for a minimum of 30 minutes, taxis will have to collect spectators north and south of the road closure. We will as part of the highways design and implementation provide taxi bays on Park Lane to facilitate the drop off and collection of passengers from Park Lane.

NFL and Concerts

We have assessed the proposed NFL match day scenario which will have fewer people arriving by car; this is largely due to the origins of the trips being more dispersed with some 15% (9,150) of spectators expected to arrive by car. This will increase the loading on public transport with more spectators using the Victoria Line and the rail service to arrive and depart. The shuttle bus will be provided as on a match day. Kick off for a NFL game will be at 14:30 hours with final whistle at 18:00 hours on weekends. All the service uplift and transport infrastructure will remain the same as for a Premier League game. We have reviewed the assessment and the impacts of the proposed NFL scenario on the local public transport interchanges as follows:

The forecasted arrival profile to the stadium gate line of NFL spectators is similar to that of football spectators with approximately 70% of spectators arriving at the stadium gate line 45 minutes before kick off. However due to the nature of NFL games fans are expected to arrive earlier to spend time in tailor made fan parks. The TA forecasts that approximately 40% of fans attending NFL games will arrive earlier. The applicant is proposing that by providing retention measures within the stadium they will achieve a lower departure profile with only 45% of spectators departing within the first 30 minutes compared to 85% of spectators departing within 30 minutes of the final whistle. In our view whilst the forecast of 40% of fans arriving earlier is achievable; the forecasted retention of 20% of fans is optimistic and does not represent the peak loading of the public transport system and is not the worst case scenario. In addition the applicant has not provided sufficient evidence to support such large percentage retention. We will however support the forecasted scenario if the applicant is willing to accept a S.106 obligation to use best endeavours to achieve the forecasted departure profile by providing a range of retention measures to be agreed by the local planning authority before the stadium is occupied.

Based on the above departure profiles no queues are expected at White Hart Lane station on the northbound platform, 877 spectators are expected to queue for southbound trains, the queue is forecasted to last some 45 minutes with no single spectator forecasted to queue for more than 16 minutes post match.

Northumberland Park will have a maximum queue length of 64 people travelling northbound with a maximum queuing time of 16 minutes, maximum queuing time per spectator of 1 minute. The southbound service will have a maximum queue of 534 spectators and will last some 30 minutes with a maximum spectator queuing time of 14 minutes.

There will be some queuing for northbound spectators travelling towards the stadium, from Seven Sisters station, when interchanging from underground to rail, as some spectators will not be able to get on the first train. However this will be mitigated by the revised station management plan as part of the event management plan to be agreed by TfL. Due to the rate of arrival post NFL match at Seven Sister Station there will be a maximum queue outside the station of 101 spectators, the queue will last for 16 minutes, with a maximum queuing time of one minute per spectator.

The TA forecasts that Tottenham Hale will be used by 18% of spectators pre NFL match and 23% of spectators post match. Some additional station management measures will be required as part of the event day management plan to be secured as part of the S.106 agreement. Some queuing is expected at the gate line, which will last for approximately 22 minutes with approximately 400 spectators queuing with a queuing time per spectator of 2 minutes.

The stadium will be used as a concert venue and will have a capacity of between 45,000 and 55,000 visitors. This is a 10,000 increase in the capacity compared to the previous approved scheme which has permission for concerts of up to 45,000 visitors. We agree with the applicants TA that a concert would generate fewer trips by car due to the nature of the event with spectators travelling further to attend these events, however this will result in a greater demand for public transport services. Only 10% of visitors will arrive/ depart by car as a car driver/ passenger; approximately 50% of visitors will arrive a minimum of 75 minutes before the concert begins. The departure profile will see some visitors departing before the concert ends, only 16% of visitors will remain post the concert. We have considered that the proposed arrival and departure profiles are realistic and accurately reflect the potential loading on the public transport system.

Due to the forecasted departure profile with 65% of visitors departing within 15 minutes of the concert ending, the concert scenario at 55,000 capacity will result in queuing for a southbound service at Northumberland Park. The queue is forecasted to last 90 minutes with (maximum queue size of 2031 visitors), the maximum queue per individual is 47 minutes. The northbound service will be 15 minutes. The queue at White Hart Lane will last for some 65 minutes with a maximum waiting time for a visitor of 29 minutes. Seven Sisters will have a queue of 2,131 visitors, with maximum queue duration of 40 minutes, with a visitor waiting in the queue for a minimum of 13 minutes. Tottenham Hale will have a maximum queue size of 2,531 with queue duration of 63 minutes, and a maximum wait per individual of 15 minutes. Shuttle bus service would be provided with the service level secured by the S.106 agreement.

We have considered that the proposed concert scenario at 55,000 capacity will result in substantial queuing at the local public transport interchanges post the event. However providing the mitigation measures identified above for the football are in place the impacts of the proposed concert can be managed.

Cumulative impact Assessment

The applicants transport consultant has provided a transport note detailing the cumulative impact of the trips generated by the event day and non-event day elements of the development. Any use of the stadium over 10,000 capacity will be classified as a major event and will trigger the Local Area Management Plan which will be secure by way of a S.106 agreement. The local area management plan will remove the 56 short stay pay and display parking on Worcester Avenue, the plan will also include the management of the access to the hotel and residential car parks. We have considered that there will not be significant combined cumulative demand for public transport by the non-event day and event day trip generation as the demand for public transport on an event day is likely to be in the evening and on weekends when the peak non-event day activities are coming towards an end or closed. In addition the demand will be in opposite directions with spectators travelling towards the stadium and employees/ visitors travelling away from the stadium. The only element of the proposal that will contribute towards the spectator arrival loading of the public transport system is the residential aspect of the non-event day activity, this has been accounted for in the background growth factors which have been included in the event-day assessment.

Road Safety

The existing condition report Transport Assessment accident analysis covered a significant area from the junction of Seven Sisters Road junction in the south to Tottenham High Road borough boundary with Enfield in the north; Great Cambridge Road / The Roundway to the West and Meridian Way in the east. The accident data is over 7 years old; we would have expected the applicant to have completed analysis using more recent data. However given that there has been a reduction in the traffic flows on the High Road since the 2007 combined with the enhancement to a number of crossing points, including 2 new pelican crossings on the High Road and reconfiguring the junction on High Road with Park Lane to provide additional pedestrian benefits, it is unlikely the proposed

development will result in increasing the number of accidents in the area immediately surrounding the site.

In addition all the proposed junction improvements proposed as part of the development will be reviewed by the Highways Team to ensure that the safe movement of pedestrians, cyclists and vehicles are considered at all times, in addition all design proposals will undergo an independent Stage 1 and 2 Road Safety Audit.

Delivery and Servicing and construction traffic

The supermarket and stadium will share a service access located on Northumberland Park. This access would be used for supermarket and stadium deliveries and refuse collection. This access will be used by rigid vehicles 10 metres long and articulated vehicles 16.5 metres long. The developer has provided swept paths analysis in Drawing BHC-1071 of an articulated vehicle accessing and leaving the site in forward gear. Servicing of the development to the south of the stadium will be completed via Park Lane and Worcester Avenue. The revised highways layout includes service and delivery bays which will be used to service the development to the south. The developer will be required to provide service and delivery plans for each aspect of the development which seek to coordinate deliveries to each aspect of the development and reduce the number of deliveries to the development as a whole.

Highways Design

The works associated with the northern development (supermarket, THCF offices and university technical college) have been implemented. In relation to the highways works for the stadium and southern development, the applicant is proposing to revise the layout to include the following:

1. Improvement to pedestrian crossings:- the revised application will still include the provision of an addition pelican crossing on the on the High Road. However with the aid of dynamic modelling all the widths of all the crossings south of White Hart Lane, including the Park Lane junction are much wider than previously. The crossing locations relate to the design/layout of the major stairs to the stadium podium – north and south. The proposed crossing point would fit well with the High Road West Master Plan. Changes to the layout of the High Road will require the re-location of bus stops and associated street furniture.
2. Bill Nicholson Way is replaced by a new vehicle access to the stadium just to the north. This access will be used for the hotel car parking, with event day use limitations, and as an exit from the stadium basement car park in the post-match situation (for a small proportion of the stadium parking on the west side) once the High Road reopens. The access will be shuttered and be protected by hydraulic bollards. Hotel guests would check in before being allowed to enter the car park.
3. The layout of the Park Road junction is very similar to the consented scheme. The pedestrian facilities are upgraded at the Park Lane junction with the removal of the filter lane, as previously agreed. The vehicle stop-lines will be set back with the provision of advanced cycle stop-lines within Park Lane and the High Road – at the start/finish point of CS1, TfL has made comments on the proposed layout and its potential impact on CS, as a result of the proposed design for the junction, we will seek to address TfL concerns as part of the detailed highways design.
4. The provision of loading/delivery/waste collection bays on Park Lane and Worcester Avenue for the hotel and residential development.
5. Provision of a taxi rank opposite the hotel to be suspended on event days.
6. The junction of Park Lane and Worcester Avenue is modified to accommodate the swept path of the largest OBU TV vehicle.
7. The introduction of hydraulic bollards at each end of Worcester Avenue, to be controlled by the stadium security managers. The northern bollards would replace the existing padlocked gate. These rising bollards are part of the anti-terrorism measures on an event day. As Worcester Avenue will remain in public ownership as adopted highways to be controlled under license with an agreement for the maintenance of the bollards by the club, there is a need to have a service

access agreement which will ensure that right of public access is maintained at all times and any temporary closure is approved by the Council.

8. The applicant has proposed introducing non-match day parking on Worcester Avenue including wheelchair accessible car parking to service the non-match day activities including the new health centre. We have a concern relating to the introduction of car parking spaces on Worcester Avenue in relation to the potential conflict between turning vehicles and pupils accessing the two local schools. Hence the introduction of any such parking scheme will be subject to consultation with the 2 local schools with safeguards implemented to protect pupils.
9. The construction of two bell mouth accesses onto Worcester Avenue to access the stadium (basement and ground floor area) and the residential development car parking, details of which are included in Drawing 031627 Rev3.

The applicant has included additional improvement to the highways, a part of a cohesive landscaping scheme which includes private and public highways this is illustrated in Drawing 8000-REV0, The Transportation and Highways authority will require all the above amendments and landscaping proposals to submitted in the form of a detailed design for approval by the Transportation and Highways authority, the works are to be secured by way of a S.278 agreement, all works are to be implemented at the developers expense and implemented by the Council as highway authority.

Mitigation

As part of the HGY/2010/1000 application grant funding £3.5 million was allocated by the GLA to mitigate the local impacts of the generated by the development with a match funding of £500,000 for works to Worcester Avenue, the funding allocation is as follow:

1) Highways works relation to Phase 1 (Supermarket, university technical college), £1,160,000, and these works included is signalised crossings as the junction of High Road with Northumberland Park and White Hart Lane.
2) Phase 1 and 2 CPZ works £980,000 allocation works are ongoing and works to date include implementation of an all week CPZ around the core of the development, changes to the existing match day CPZ including extending the CPZ to the west and south of the existing match day CPZ boundaries, further work are planned for this and next financial year.
3) Phase 2 Highways (£1,360,000) these works will be implemented to support the increase in the capacity of the stadium. The works include bus priority measures on Northumberland Park, Willoughby Road, Shelbourne Road and Lansdowne Road, improvements to Chestnut Road, new pelican crossings on the High Road, and new crossing point at Park Lane Junction with Shelbourne Road.
4) Worcester Avenue £500,000 for the upgrade of Worcester Avenue post the stadium construction.

Conditions relation to the Stadium Operation

In the event that the developer cannot achieve the modal split target of 20-23% by car, within 1 year of the stadium achieving 61,000 capacity, the developer will use reasonable endeavours to implement further measures to achieve the modal split targets. These should include the following measures:

1) Review and improve the communication strategy with fans (further measures to be identified by the event day monitoring plan)
2) Provide additional funding to increase the event day CPZ from the proposed 716 hectare (additional area to be agreed with the Council)
3) Enhance the bus service to and from the site (shuttle bus/ TfL bus service)
4) Improve attraction and retention measures (additional measures to be agreed with the Council).

The following conditions should be included in the Section 106 agreement in relation to attraction and retention measures in order to ensure that the attraction and retention targets are achieved.

Attraction measures:

1) Pre-Match build up programme including, player match previews, the manager pre-match press conference and fixture preview.
2) An increased retail offer for food and drinks purchase before matches.
3) Retail happy hour offers which offers discounts during the hours before games.
4) Show other matches before games in stadium or associated facilities (club pub).
5) Provide pre-match live entertainment for selected games.

Post match retention measures:

1) Live Studio premier league round-up
2) Videotron Post match highlights
3) TV live press conference
4) Tunnel Bases Interviews
5) Hospitality packages structures to encourage staying in the lounge post match, including complementary refreshments, player appearances, post match presentation.
6) Loyalty points awarded for staying half hour after the final whistle (enhanced ticket priority).
7) E-purchase on stadium access card with club cash which can be spent post matches or at forthcoming games.
8) General admission packages that include free drinks post-match happy hour.
9) Catering kiosks and bars to stay open for a minimum of 1 hours post matches.
10) Post match entertainment kids/family zone.
11) Real-time travel information- CCTV footage of station and people queuing (CCTV feed to be delayed by 20 minutes)
12) Post matches entertainment “Comedy Zones”.

In order to ensure that adequate attraction and retention measures are provided for each match. The developer must provide attraction and retention attraction programme for each game which should include all or a combination of the above activity. The programme should be submitted to the Council at least 4 weeks before each game for approval.

In order for the applicant to achieve the proposed modal split targets for spectators walking to and from the stadium the following conditions must be attached to the planning permission:

1) Provide a shuttle bus strategy including, collection drop, ticketing; enter in to a Shuttle Bus service level agreement which ensures that the shuttle bus service is implemented as per the Transport Assessment and the percentage modal split is achieved, detail of the above strategy to be approved by Transport for London and the Council before the stadium is occupied.
2) The walking route to White Hart Lane has been identified by the PERS audit as being unsatisfactory, considering the importance of this link in achieving the modal split target. We will require before the stadium is occupied for the developer to develop and fund a scheme to address the recommendation of the PERS audit for the route to White Hart Lane station via High Road and White Hart Lane and via Whitehall Street, Love Lane.
3) The PERS audit has identified the lack of route signage to and from the local public transport interchanges. Given the importance of walking as a mode to the local transport interchanges in achieving the modal split target we will require the developer to develop and submit a signage strategy for the proposed walking routes. The signage strategy should be implemented at the developer’s expense and be delivered by the Council as highway authority.
4) We will require the developer to submit a cycling strategy which seeks to increase the cycling modal share as per of the Travel Plan measures. The plan should include: cycle parking strategy and cycle route audit with recommendations to be submitted to the Council for approval before construction of the stadium commences.

5) The developer uses reasonable endeavours to achieve the modal split targets by actively promoting and prioritising tickets to local residents with a minimum of 10,000 tickets allocated to the London Borough of Haringey and Enfield.

The Applicant agrees to fund the expansion of the CPZ to address displaced parking and to achieve the modal split target.

1) The applicant agrees to monitor the proposed event-day CPZ and areas outside the event-day CPZ. A monitoring programme to be agreed Local Planning authority before construction commences.
2) The applicant agrees to pay for the cost of management of the proposed CPZ above, if generated revenue is insufficient to cover the cost of enforcing the CPZ (to be monitored annually).

We will require the following conditions to be part of the planning permission in order to achieve the modal split proposed by rail and to supplement the Event Day rail strategy:

1) The applicant agrees by way of S.106 to use best endeavours to secure and maintain a minimum of 8 car service with the current and future train operating company with service levels of 4 trains per hour on an event day.
2) S.106 obligation to fund or provide staff to manage crowds during the operation of White Hart Lane and Northumberland Park on an event day as part of an area management plan.
3) S.106 obligation to funding platform sensors at Northumberland Park to secure selective door opening to happen in order to achieve the modal split target.

We will require the following conditions as part to the planning permission in order to support the proposed transport strategy for Seven Sisters Station:

1) S.106 obligation for the developer to provide stewarding to manage queues at Seven Sisters and the Junction of Seven Sisters Station with the High Road.
2) S.106 obligation for the developer to use reasonable endeavours to assist TfL with the development of an operations plan for Seven Sisters to maximise the operation of the station and manage queuing outside the station
3) S.106 obligation for the developer to use reasonable endeavours to provide as part of their Travel Plan a communication strategy for Seven Sisters.
4) S.106 obligation to monitor Seven Sisters station as part of the event day monitoring plan, (monitoring parameters to be agreed by the TFL and the Council's Transport Planning team before stadium construction commences).

We would request that the applicant agrees the following conditions in order to support the strategy for Tottenham Hale station.

1) This should include monitoring of the numbers of spectators using Tottenham Hale station.
2) S.106 obligation to extend the use of the shuttle bus service to all spectators to increase use of the station after the completion of the stadium development to achieve the modal split target.
3) S.106 obligation to provide stewards along the walking route to Tottenham Hale Station
4) As part of the revised station management plan to be funded by the applicant the applicant will provide additional resources (fund additional staff) to Transport for London to manage queues within the station pre-match to aid vertical circulation and maintain the safe operation of the station.

Local Area Management Plan

The applicant will be required to provide a detailed Travel Plan, Event Day Management Plan, communication strategy and Local Area Management Plan. The four plans are essential as they tie the

whole event day transport strategy together and will be a key factor in achieving the modal split targets. These plans are to be secured as part of the S.106. In the event that Tottenham Hale station has to be closed per match due to overcrowding, the local area management plan will have to provide stewarding at Blackhorse Road station and explore the possible of extending the shuttle bus service to Blackhorse Road station.

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The following sections of the Travel Plan document should be submitted in full for review post construction of the stadium above podium or 1 year before occupation.

A) Cycle Strategy
B) Shuttle bus strategy
C) Communication strategy

1) S.106 obligation to appoint and pay the cost for an independent third party to review the event day monitoring plan, travel plans and area management plan.

2) S.106 obligation to pay the sum of £30,000 (thirty thousand pounds) per year for 6 year to monitor the Travel Plans, Local area management, service and deliver plan.

3) S.106 obligation to as part of the local area management plan to contribute £1,500 (one thousand five hundred pounds) toward cleaning and waste collection per match, cost to be review annually.

We will require the developer to agree to the following conditions in order to support the proposed bus strategy:

1) S.106 obligation to provide stewarding and management of Willoughby Lane and Shelbourne Road bus diversion route to reduce the impact of fans crossing at the junction of Shelbourne Road junction with Park Lane
2) S.106 obligation to provide stewarding and additional information including signage on bus diversion stops when the High Road is closed.
3) S.106 obligation to monitor the proposed bus diversion route and bus use as part of the Event day monitoring Plan.

We would therefore require the following conditions to be agreed by the developer in order to support the proposed coach strategy:

1) S.106 obligation to provide a coach strategy to achieve the modal split target including an agreement to fund coach service and if required to achieve the modal split target, the coach strategy must be approved in consultation with Transport for London and the Borough.
2) S.106 obligation to management the Coach parking area and routes to the coach parking by stewards.

We would therefore require that the following condition be applied to the use of the Stadium Parking:

1) The Team coach drop-off area is only used by Team coaches.
2) S.106 obligation to ensure that all entry and exit for drop-off in the arrival area is supervised by trained stewards.
3) The developer submits a vehicle management plan, which is implemented for the use of the car park and any vehicles to park on Worcester Avenue.
4) All stadium parking is allocated before arrival into the local area, and cars arrive at least 1 hour before the start time of the event.
5) That egress should be prevented until a minimum of 45 minutes after an event.
6) The 822 spaces under the stadium must only be used on the day of a ‘major event’ which is any event where the attendance is planned to be in excess of 10,000.

7) Usage at all other times must be limited to a maximum of 80 spaces, not including blue badge holders.

Traffic Management

It is essential to maintain a safe environment around the stadium for fans attending the stadium, especially so, post match when streets experience the most congestion. We will therefore require the developer to use reasonable endeavours to secure and pay for the closure and management of the following road closures and the management of the proposed diversions resulting from the closures of the High Road. We will require the developer to agree to the following conditions in order to safeguard fans/ pedestrians and assist in achieving the modal split targets.

1) S.106 obligation to fund Match day car parking restrictions and management of Worcester Avenue, which must be closed on match days to all traffic from a minimum of 2 hours before kick-off.
2) S.106 obligation to fund the closure and management of Park Lane, between the High Road and Vicarage Road, which will need to be closed on a match day.
3) S.106 obligation to fund and manage the closure of the High Road between White Hart Lane and Lansdowne Road. The developer should use reasonable endeavours to have the road reopened within 40 minutes of the final whistle.
4) S.106 obligation to fund the closure and management of White Hart Lane between Pretoria Road and the High Road.
5) The introduction of hydraulic bollards at each end of Worcester Avenue, to be controlled by the stadium security managers. The northern bollards would replace the existing padlocked gate. These rising bollards are part of the anti-terrorism measures on an event day. As Worcester Avenue will remain in public ownership as adopted highway to be controlled by the club, the Council will require the club to enter into an Access Agreement to retain vehicular access to the public as part of any licensing and an agreement for the maintenance of the bollards.

Conditions relating to non-event days

On reviewing this application the highways and transportation authority would not object to this application subject to the following conditions:

1) A residential and school travel plan must be secured by the S.106 agreement, as part of the travel plans, the following measures must be included in order maximise the use of public transport.

a) The developer must appointment a travel plan co-ordinator for the residential and commercial aspect of the development and must work in collaboration with the Facility Management Team to monitor the travel plan initiatives annually.

b) Provision of welcome residential induction packs containing public transport and cycling/walking information like available bus/rail/tube services, map and time-tables to all new residents, travel pack to be approved by the Councils transportation planning team.

c) Establishment or operation of a car club scheme, which includes at least 3 car spaces. The developer must offer free membership to all residents of the development for at least the first 2 years, evidence of which must be submitted the Transportation planning team.

d) provide a cycling strategy for the non match aspect of the development which review the existing cycling infrastructure, and provide measures which seeks to increase the cycling modal split for the entire development, these measures should include, the provision of employee and visitors cycle parking in each aspect of the development, changing rooms, showers and lockers for all aspects of the development which have employees, these measures are to be reviewed annually as part of the Travel Plan.

e) A site parking management plan, the plan must include, details on the allocation and management of on-site car parking spaces in order to maximise use of public transport, family size units should have priority for car parking allocation.

f) The level of parking used as for conference and events must be no more than 50 car parking spaces, unless trip generation and junction modelling analysis is provided to demonstrate that a high percentage of parking allocation can be accommodated on-site without having any impact on the transportation and highways network.
g) We will require the applicant to submit for approval the: the location, type of cycle parking, proposed method of security of cycle parking provision, allocation of cycle parking spaces and long term maintenance strategy of the cycle parking areas and provide short stay cycle parking in line with the London Plan.

Reason: To minimise the traffic impact generated by this development on the adjoining roads, and to promote travel by sustainable modes of transport.

2) The applicant is required to enter into a S.106 agreement including provision that no residents within the proposed development will be entitled to apply for a resident's parking permit under the terms of any current or subsequent Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. This should be included in all marketing, lease and sales agreements.

Reason: To mitigate the parking demand generated by this development proposal on the local highways network by constraining car ownership and subsequent trips generated by car, resulting in increased travel by sustainable modes of transport hence reducing the congestion on the highways network.

Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation network.

Planning obligation and condition in relation to the entire development

Highways S.278 commitment

The applicant has included additional improvement to the highways, a part of cohesive landscaping scheme which includes private and public highways this is illustrated in Drawing: 8000-REV0 and revised layout BUR-xx-xx-GA-CI-2001 RV45, the transportation and Highways authority will require all the above amendments and landscaping proposals to be submitted in the form of a detailed design for approval by the transportation and highways authority, the works are to be secured by way of a S.278 agreement, all work above the Phase 2 highways allocation (£1,360,000) are to be implemented at the developers expense.

Service and Delivery

We will therefore require the following condition to be attached to the planning permission; the applicant is also required to submit a service and delivery plan (DSP).

Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation

1) The developer is to provide further swept path analysis to demonstrate that large delivery vehicles can exit the site safely without causing delays to eastbound traffic along Northumberland Park.
2) The developer will be required to provide a detailed service and delivery plan for the entire development including no deliveries via the High Road and the junction of the High Road with Northumberland Park and deliveries to be outside the morning and evening peak hours.

3) We will require the developer to provide a drawing to demonstrate that articulated vehicles and enter and leave the Megastore service yard in forward gear.

Construction management

The applicant/developer is required to submit a Construction Management Plan (CMP) and Construction Logistics Plan (CLP) for the local authority's approval 3 months (three months) prior to construction work commencing on each phase of the development. The Plans should provide details on how construction work (inc. demolitions) would be undertaken in a manner that disruption to traffic and pedestrians on the High Road and Park Lane, Worcester Avenue and the roads surrounding the site is minimised. It is also requested that construction vehicle movements should be carefully planned and co-ordinated to avoid the AM and PM peak periods. The plans must also include measures to safeguard and maintain the operation of the adjacent bus stands and routes to the two local schools.

CONSERVATION COMMENTS

Application Ref:	**HGY/2015/3000**
Location:	**Tottenham Hotspur Football Club 748 High Road, Tottenham**
Proposal:	**Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001). The proposal is EIA development. THIS IS A RECONSULTATION FOLLOWING THE SUBMISSION OF ADDITIONAL ENVIRONMENTAL INFORMATION.**
Officer:	**Neil McClellan**

Background:

Tottenham Hotspur Football ground partly falls within the North Tottenham Conservation Area and the Tottenham Historic Corridor. This section of the High Road is characterised by predominantly three-storey brick-built Victorian and Edwardian buildings that front directly onto the High Road.

The site also falls within the wider regeneration sites of Tottenham in the Tottenham Area Action Plan. The main areas of focus that could be influenced by the Stadium development are High Road West and Northumberland Park. No doubt, the stadium development could be a catalyst in the future regeneration of the area.

The applicants have received planning permission for a new stadium and associated works along with residential development, hotel, museum and associated public realm works as per HGY/2010/1000. Demolition of several buildings, including Fletcher House (listed at grade II) was given approval at this time in order to facilitate the stadium development. This also included a locally listed terrace- 766-754 High Road. A section 106 agreement was agreed to retain the locally and

listed buildings at the southern end- Nos 750, 748, 746 and 744 to be restored and refurbished for reuse.

This scheme has been partly implemented in that the ground works for the stadium and the demolition of the listed and locally listed buildings has been undertaken. The proposed Lilywhite Lounge has been completed along with raised ramp to access the building along Paxton Road and the new Sainsbury's super market fronting Northumberland Park.

The new scheme proposes to demolish further three locally listed buildings (out of the four agreed as part of the Section 106 to be retained), enclose the remaining listed building within a modern metal clad terrace, a new stadium of a different design, a hotel and associated public realm. It further seeks outline planning permission for an 'Extreme Sport' building and four residential towers.

Heritage Assessment:

In essence, the main heritage assets to consider are:

- Tottenham Historic Corridor
- North Tottenham Conservation Area, including the other listed and locally listed building beyond the immediate vicinity of the site
- No 744, Warmington House (listed grade II)
- Nos 746-750, locally listed, proposed to be demolished
- Nos 790-814 High Road on the north side, most of which are listed at grade II and II* (the northern terrace);
- No 707, High Road (listed grade II)
- No 705, High Road (locally listed)
- St Francis De Sales RC Junior School ad Presbytery (Locally Listed)
- Nos 743-759 on the south side, locally listed
- Nos 793-829 on the south side, listed (grade II) and locally listed
- 2-4 Park Lane (Locally Listed)
- Bruce Castle Conservation Area
- Alexandra Palace and Park Conservation Area and Registered Historic Park
- Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield

The North Tottenham Conservation Area was originally designated in 1972, and is one of a sequence of six conservation areas, which form the Tottenham High Road Historic Corridor. The area runs from the northern boundary of the borough to south of the junction with Lordship Land / Lansdowne Road.

One of the most significant aspects of the conservation area is that it is part of a long established route. Tottenham High Road is now, and has been for many centuries, a main route into London from the north. The Roman road, known as Ermine Street followed parts of the High Road. In the Middle Ages, settlement was strung out along the road. During the 18th century, fashionable houses

were built along the High Road, and later, as mass transport developed in the form of railways and trams, the High Road became infilled with houses, shops, and grand civic and commercial buildings.

The junction at Northumberland Park and White Hart Lane forms a historic village core with an intense and highly significant cluster of Statutorily Listed buildings (mainly grouped on the east side of the High Road), and Locally Listed buildings. Paragraph 4.28 of the Tottenham Historic Corridor Appraisal (adopted 2009) states- 'This section of the eastern side of the High Road is fronted by some of the best preserved groups of the substantial Georgian properties that characterise much of the area'. Unfortunately, many of these buildings have been vacant and neglected for over 15 years and are included in Historic England's 'Heritage and risk' register.

The 18th Century Georgian town houses on the eastern side of the High Road adjacent to the stadium are vital and distinctive elements of this part of Tottenham. There is a distinctive and idiosyncratic quality to this part of the conservation area, resulting from the 'interweaving' of several phases of developments of North Tottenham: the high quality Georgian buildings juxtaposed with the later mainly two to three storey Victorian and Edwardian buildings along with the Tottenham Hotspur Stadium and the latest Lilywhite Lounge rising above the Georgian terraces, as viewed from White Hart Lane. The High Road, however, appears distinctive with the general homogeneity in scale and massing of the various buildings, built up to the pavement.

The Tottenham Hotspur Football Club has great cultural significance not only within the local area but beyond London. On match days, the area transforms with football fans flocking into the stadium, with many businesses thriving on match day economy. The club's association with Tottenham High Road is over 130 years old. The club derives its name from the wife of the owner of Percy House, 796 High Road, who was the grand-daughter of the Earl of Northumberland and descendant of Hugh 'Hotspur' Percy (1364-1403) after whom Tottenham Hotspurs Football Club was named[1].

Notwithstanding the above, the current stadium's architectural contribution to the setting of the conservation area is negative and even though set back, its relationship with the High Road is poor. This section of the High Road originally contained a row of unlisted, locally listed buildings and one listed building behind which the Stadium almost existed unobtrusively. As already stated above, this group of buildings has been demolished as part of the part implementation of the previously granted scheme. Paragraph 4.36 of the adopted appraisal described these buildings as:

> 'The section of the High Road between Paxton Road and Bill Nicholson Way is primarily lined with three storey Victorian buildings that front directly onto the road. They have shops at ground floor level, with two floors of residential accommodation above. Nos. 754 to 766 (even) are local listed buildings, typical of the narrow fronted Victorian shop houses of approximately 6m wide, that are common along the High Road. Together with Nos. 752A to C this terrace is constructed of yellow London stock brick, Nos. 752A to C with red brick dressings. Unfortunately, Nos. 764 & 766, now have rendered facades, 'boarded up' windows and their poor condition diminishes their contribution to the streetscene'.

[1] Newell, C. 2015. *Heritage Statement for Percy House, 796 High Road, Tottenham.* [Online]. London. Corrie Newell Historic Buildings Consultancy. [October 2015]. Available from: http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=282128

The demolition has caused the uninspiring frontage of the existing stadium to be exposed detracting from the conservation area. The demolition has also resulted in a break in the High Road, thus causing harm to the significance of the conservation area and its setting.

A further three locally listed buildings are being proposed to be demolished. These are described in the appraisal as:

a) **No. 750, the former White Hart public house** is a three storey local listed Victorian building that constructed of red brick, with stone mullioned casement windows and decorated moulded double gables on both street elevations. Its ground floor pilasters and cladding is in granite and it has a splayed corner with a distinctive arched entrance. Although the building has been detrimentally altered through the introduction of unsympathetic fascia signage, it is of architectural interest.
b) **No. 748, The Red House**, is a grand three storey locally listed late Victorian building, which is constructed of red brick with a steeply pitched double gable ends to the High Road, slate roofs and tall red brick chimney stacks. The first and second floors are delineated by stucco stringcourses, and both the High Road and Bill Nicholson Way elevations have a first floor central white painted canted oriel window with a decorated parapet.
c) **No. 746 (former Tottenham Dispensary)** is an attractive symmetrical three storey red brick Edwardian local listed building with a Portland stone ground floor façade and an arched central entrance flanked by stone columns with a semi-circular fanlight over the door. The stone entablature fascia is inscribed 'TOTTENHAM AND EDMONTON DISPENSARY'. It has a prominent projecting stone parapet cornice with dentils and panelled blocking course, and tall brick chimney stacks at each end.

No 744, Warmington House, is a Grade II listed early C19 three storey building set back from the High Road. The south flank elevation has a Diocletian window at attic level. Adjoining Warmington House to the south, were nos. 740 & 742 which were locally listed Victorian buildings that have been demolished as part of the part implementation of the previous consent.

In my view, whilst the demolition the buildings as part of the implemented works cause loss of significance to the linearity of the High Road, the three locally listed buildings along with Warmington House form an important group that to some extent reinforce the scale and building line of High Road at this end of the stadium. Additionally, whilst in a run-down neglected condition, the locally listed buildings are an attractive group with significant architectural detailing that contributes positively to the conservation area as well as the setting of the listed building.

The applicant as part of the application has submitted a detailed Heritage statement which includes an analysis of the historical development of the site, the wider area and an assessment of the buildings within the site proposed to be demolished and the listed building proposed to be retained. It further provides a Heritage Impact Assessment of the demolition of the three buildings and the impact of the proposal on the conservation area, the designated and non-designated heritage assets within it, and their setting.

I have reviewed applicant's heritage assessment and have given regard to the Council's adopted Tottenham Historic Corridor Conservation Area Appraisal (2009), to provide my views on the proposed development as discussed below.

Impact of demolition

The applicant's Heritage Statement is well detailed and researched which I acknowledge. I agree with its assessment in paragraph 1.2.2 that 'The recent consented demolition.....detracts from the conservation area and the setting of the listed buildings in the conservation area.' However, it fails to acknowledge that the demolition was part of the previous consent and should be assessed cumulatively with the additional demolitions proposed.

In my opinion, the cumulative impact of the already demolished buildings in addition to the further demolition proposed would invariably have an impact on the conservation area and the continuity of the High Road as is evident already. This cannot, therefore, be ignored in the overall heritage impact assessment of demolition.

As discussed earlier, the previous demolition has left this section of the High Road 'blank' and I see the current proposal as the continuation of the previous, causing further harm to the continuity of the conservation area and the historic corridor. At the time of the previous application, in order to facilitate the stadium development (prior to Barnwell Manor case law and the NPPF) demolition was agreed despite the substantial harm with the agreement to protect and preserve the three locally listed buildings (Nos 750, 748 and 746) and the listed building (Warmington House, No 744) at the southern end of the development. This was following several efforts and negotiations from Historic England, SAVE Britain's Heritage and Victorian Society along with Haringey's own Conservation Officer. On balance, the podium level interaction along the High Road and the retention of the remaining four buildings was seen to provide some continuity to the High Road.

The new scheme proposes further demolition of three locally listed buildings, leaving only the listed Warmington House on this stretch of the High Road. In my opinion, the proposed demolition, cumulative with the consented demolition would cause substantial and irreparable harm to the continuity of the historic corridor, the conservation area, the listed and locally listed buildings within it and their setting.

I now come to the impact of the loss of the individual buildings and their assessment and justification as provided by the applicant. The applicant has summarised the significance of these buildings in paragraphs 1.3.8 to 1.3.27 and discussed these in greater detail in section 2.3.The assessment in some ways is dismissive of the architectural contribution (albeit run down since no longer in use). In assessing their aesthetic and architectural significance, there appears to be the recurring theme 'loss of context due to the demolitions'. This does not just refer the demolitions that have already been undertaken in the recent past. There also appears to be an incremental loss of the setting and significance of these buildings as the stadium itself expanded. For example, in paragraph 2.3.8, the applicant describes 'the rear plot of Warmington House' was truncated during this period and has since been entirely subsumed into the football club parking area'. In paragraph 2.3.18, with regards to the Dispensary building, the applicant states 'In recent years the building has

been used by THFC but at present utilised simply for storage'. It then goes on to say its poor condition and describe the boarded windows and how the ancillary building within its setting has been since demolished and subsumed within the Club's car park.
The applicant, however, does highlight the historic and communal significance of the buildings. For example, in paragraph 1.3.15, the document (with regards to the Dispensary) states 'The historic significance of the building lies in its original use as Dispensary and its connection to an aspect of the early development of health care in England'. With regards to Red House, paragraph 1.3.20 states 'The Red House has historical significance for its origins as a coffee house and association with the late 19th Century temperance movement which sought to provide an alternative to the public house as a meeting point for the working classes'. Similarly, it also highlights the communal value of Red House 'in its later use as the office of the Tottenham Hotspur Manager Bill Nicholson' (paragraph 1.3.22).

Based on their own assessments as well as the Council's Appraisal, I consider the significance of these buildings to be high in terms of their architectural, historic and communal value. I agree that their interiors perhaps do not contribute to the conservation area, but it is evident that they have been neglected by the owners and have been left vacant for a long time. More importantly, interior alterations are expected of locally listed buildings as they are not governed by the same controls as a statutorily listed building. I would not consider that to be a reason for diminishing their local contribution to the conservation area.

I disagree with the applicant's assessment of the architectural and aesthetic significance of the building on the basis of their unkempt condition and 'loss of context'. I find this assessment flawed as it seems to have used the 'cause' of the demolition as the 'reason' for loss of significance of the buildings. It suggests that since previous demolitions have taken place, the existing buildings have lost their context, without acknowledging that the demolition was part of an agreed plan to facilitate the stadium's development with the agreement to retain these particular buildings. Additionally, the stadium's own expansion and neglect of the historic buildings it has owned has resulted in further incremental loss of 'context', significance and setting. The 'loss of context' is clearly 'caused' by the existing stadium and the proposed development and this part of the assessment is, in my opinion, flawed.

Based on their assessment, the applicant implies that the loss of the buildings would cause less than substantial harm, since they have already lost their context and that their unkempt and vacant condition has diminished their significance. As such their conclusion is, 'The proposals would require the loss of three locally listed buildings [..] would therefore result in some harm, to significance of this conservation area (paragraph 1.4.5). This conclusion is also detailed out in paragraph 4.4.10 of the Heritage Statement.

I disagree with this conclusion and attribute high significance to these buildings individually. I conclude that they contribute positively to the conservation area's architectural, historic and communal value. Their demolition would, therefore, cause substantial harm to the conservation area and its significance.

Additionally, their loss would also cause substantial harm to the setting of Warmington House, a statutorily listed building. The buildings together form a group and form part of the continuity of the High Road's bygone past and contribute to Warmington House's setting.

The impact of demolition on the setting of other listed buildings (the Northern Terrace) 707 High Road, and other locally listed buildings would be limited given their distance and proximity.

Justification of demolition

Paragraph 4.2.14 of the applicant's heritage statement states that 'The demolition of the three locally listed buildings is proposed in order to address two key issues: crowd flow safety and townscape'. Paragraphs 4.2.15 to 4.2.41 go into details of how the demolition would achieve safer pedestrian flow and that the proposed Tottenham experience building would enhance the townscape of the High Road.

In addition, the applicant has also submitted a separate optional appraisal of various solutions to overcome crowd safety issues. In paragraph 4.5.8 of this document, the applicant states that the minimum required width of the pavement to provide safe crowd flow is 6.8m. The effective width in front of 746 High Road is 3.8m; 748 High Road is 1.8m and 750 High Road in 2.2m, resulting in a pinch point of 1.8 outside No 748. It is this 'pinch point' and narrow pavement that is being used as an argument to demolish the three locally listed buildings, to effectively gain 5m excess pavement. The report has been further corroborated by an independent expert Dr Jamie Dickie in his report dated 9th October 2015.

The report further includes options such as stewarding and temporary closures and comes to the conclusion that the only way to achieve the safe footway of crowd safety would be to demolish these buildings. This argument has been used largely towards justifying the demolition of locally listed buildings. In my opinion, the proposal would cause total loss of significance of three non-designated heritage assets, and cause substantial harm to the continuity of the historic corridor, and the significance of the conservation area as well as the setting of the listed building (Warmington House).

In terms of townscape, the applicant's Heritage Statement argues that the replacement of the buildings 'would allow a more holistic approach to the design of the stadium development, transforming the way in which it will address and connect with the High Road and resulting in an overall enhancement of the character of the conservation area' (paragraph 4.2.18). It further states that 'The significance of the locally listed buildings would be partially retained by salvaging artefacts and elements of the building for relocation and/or reuse within the proposed Tottenham Experience Museum'. This includes: the shop front of the 'Tottenham and Edmonton Dispensary'; Bill Nicholson's panelled office in the Red House; and possibly elements of the façade such as the bay window (paragraph 4.2.23). It further states that the local historic significance of the buildings would be recorded in the form of virtual interactive exhibits in the proposed Museum.

I have discussed the design of the proposed buildings and their townscape contribution separately in the relevant section, under the heading 'Tottenham Experience and Warmington House'. With

regards to the townscape, I consider that the High Road is a diverse mix of Georgian, Victorian and Edwardian buildings, mainly two to three storeys in red or yellow stock brick. Whilst there are inter-war and post war buildings interspersed, the general homogeneity of scale and massing prevails throughout, providing continuity along the High Road. This in essence, is the townscape of the area. The three buildings proposed to be demolished contribute positively to this townscape.

The applicant argues that the proposed terrace would 'allow for a more holistic approach to the design of the stadium development'. I agree with this argument to a degree in that that the materials and, to an extent, the scale would form a transition between the stadium and the High Road. Whilst this may have some townscape benefits, the new terrace would not relate to the existing character of the High Road and would not outweigh the substantial harm caused by the loss of the locally listed buildings and the substantial harm caused to the setting of Warmington House.

The three pieces of artefacts and façades that would be 'saved' and placed within the interiors of the Tottenham Museum would be taken out of their original context and would not overcome the total loss of their significance. Whilst there could be an argument that part of their communal significance is being retained by way of interpretation, this would not outweigh the substantial harm.

Additionally, paragraphs 4.2.19 and 4.4.19 of the Heritage Statement discusses the options of retaining the three locally listed buildings and the impact it may have on the delivery of the project. It claims that the layout of the buildings is such that they cannot be incorporated within the new terrace. It also states that the condition of the building and spaces available could not be utilised fully in the manner that the current proposal does. It states that the Tottenham Experience as well as the Skywalk would then be relocated to the rear, taking away active frontage from the High Road. I disagree with this proposition as no such alternatives have been presented that would evidence this argument. The optional appraisal only talks about the related crowd flow safety issue but does not discuss issues around the functionality (or lack of) of the locally listed buildings. I, therefore, disagree with this justification.

Overall, I conclude that the substantial harm caused due to the demolition of the three locally listed buildings on Warmington House, the conservation area, and their setting is not justified. The crowd safety argument requires demolition of three locally listed buildings and would cause substantial harm to the conservation area, the listed building and their setting. Recreating a new terrace in modern material, whilst may respond to the Stadium's design, does not relate to the wider conservation area and does not overcome the substantial harm caused by the loss of three positively contributing buildings. The heritage benefit (community significance) in retaining the three pieces of the facades and artefacts is limited and as such does not overcome the substantial harm.

Proposed development and its impact on historic environment

Having assessed the impact of the demolition, I now come to the impact of the new scheme. The following sections discuss the impact of the new development in relation to the various parts of the proposal:

Stadium

The scheme proposes a new stadium with a capacity of 61,000 (increased from 56,250 of the previously consented scheme) with a retractable football pitch to allow for NFL games, concerts and a range of other activities whilst protecting the integrity of the playing surface. It will also introduce a unique 'sky walk' visitor attraction allowing people to climb the exterior of the building up to 40 meters high. Evidently, the new stadium would be a multi-functional destination and would be used more often than the current stadium.

In terms of design, the proposed structure is well considered with a prominent street presence and entrance to address the High Road. The Design Statement in section 7.1.1 describes the design as 'a sculpted appearance- wrapping and folding its way around the stadium before reaching the home end, where a glass façade arches upwards to reveal the magnificent single tier home stand'. Indeed, along the High Road, the structure wraps around elegantly gently cascading up to the arch to reveal the glass clad single tier home stand. At the home stand, the five storey atrium space becomes an architectural focal point with the arch of the metal cladding framing the entire elevation. The eastern elevation on Worcester Avenue is addressed elegantly with a similar cascade of glass and metal cladding.

Whilst a substantial structure, the elevation treatment is such that it breaks up the overall mass of the structure with 'a palette of different surfaces and textures such as a veil of perforated metal panels, glazing, pre-cast concrete cladding and solid profiled metal cladding' (Section 7.6, Design Statement). Furthermore, the perforated metal panels act as the screen over the external plant areas that negate the need for louvers on principle elevations. Section 7.7.1 describes the external appearance and states 'This skin wraps around the whole stadium and helps to unify the external façade – creating a dynamic and flowing form that expresses the importance of both the main west entrance and, most importantly the south stand'. In my opinion, this is one of the most fascinating and interesting features of the new stadium design.

On the High Road, a diagonal glass box addresses the street frontage. The box allows views of the escalator behind taking spectators to their relevant tiers. Visually, this creates an interactive frontage that allows views into the stadium's activities on both match and non-match days. The box also creates visual transition within the scale of the stadium and the High Road.

For the reasons above, I am convinced that the new stadium is of an exceptionally high quality and the design team must be congratulated for the same. The proportions, design and appearance of the new stadium would be a landmark achievement on its own and would be an exemplar once constructed.

However, I must assess this in respect of the heritage context in which it sits. The scale, height and massing of the structure, whilst established by the previously consented scheme, remains alien to its High Road context. Arguably, it is this High Road context that makes the proposals more unique as well as challenging, being perhaps the only stadium in the middle of a historic High Road. By virtue of its scale and height, the new stadium would not preserve the setting of the High Road, the wider conservation area and other designated and non-designated assets, especially the listed buildings along the North terrace. However, this harm would be considered less than substantial as there is

already a stadium on the existing site, albeit set back from the road; and that the harm (of the stadium only) would be no greater than the consented scheme. The stadium would also have an impact on the setting of the other listed and locally listed buildings along the west of the High Road. This again, would be no greater than the consented scheme and would be less than substantial. I have given great regard to the less than substantial harm in assessing whether the new stadium enhances the significance and setting of the heritage assets.

Due to its high quality design, I consider that the new stadium would provide a greater degree of enhancement than the existing stadium or the consented scheme, providing considerable heritage benefit. I consider, therefore, that the heritage benefit to replace the negatively contributing existing stadium by a higher quality structure would overcome the less than substantial harm to the setting of the conservation area ,the listed buildings (the Northern Terrace and 707 High Road) and the locally listed buildings on west side caused by its scale. However, it does not, in my opinion, outweigh the substantial harm caused by the demolitions and the break in the continuity of the High Road, as discussed before.

Tottenham experience and treatment of Warmington House

As discussed before, the scheme proposes to demolish the three locally listed building; retaining the grade II listed Warmington House and creating a new terrace of three storey buildings called 'The Tottenham Experience'. The terrace would incorporate the listed building, restore it and convert it as part of the Tottenham Museum.

The Heritage statement, paragraph 4.2.26, states 'The proposed Tottenham Experience building would form a vital part of this southern gateway'. The statement goes on to argue that this solution would be better than the consented scheme which gave undue prominence to the plain southern return elevation of the Warmington House. Paragraph 4.2.27 states that 'The Tottenham Experience building, together with the proposed stadium, would reinforce the High Road building line in the form of a new two storey terrace flanking the retained and fully restored grade II listed Warmington House.'

In addition, paragraph 4.2.29 explains how the terrace should shaped and angled to give variety to the building line and roofscape currently provided by the three locally listed buildings while creating a stronger building line overall. Although, seemingly one, the elevation would be divided into two principal sections by a staircase providing access to the south podium. At the southern edge of the terrace, a sleek full height glass entrance would provide a focal point an obvious entrance to it.

This terrace would be on either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this 'two storey' structure would be the same height as the listed building itself. To the rear, there would be an atrium connecting the rear of the building to the public square. The works would restore the listed building, including repair works to all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum. It is claimed that this part of the museum would encapsulate not only the history of the football club but also reflect the history and cultural heritage of Tottenham as a place.

Paragraph 4.2.42 to 4.2.45 go on to justify that since Warmington House was always part of a terrace and having lost its 'context' with the further proposed demolition of the three locally listed building, the proposal would enhance its original setting, albeit in a contemporary manner.

I welcome the retention of the listed building as well as its restoration, and the treatment to the front façade with the steps reintroduced to provide some defensible space and would consider this as heritage benefit. I also agree that whilst rather simple, the new terrace reflects the scale and massing of the listed building and the High Road and would be of a high quality and contemporary design that responds to the character of the new stadium. However, the new terrace would 'enclose' the listed building entirely leaving it subservient to the rest of the terrace. In addition, the rear atrium would only provide glimpses of the listed building to the passing crowd without any real interaction with it. The proposal would cover it entirely on three elevations, and in my opinion, would not provide an appropriate context to the listed building causing substantial harm it. Whilst the glass insertions on either side do help to break the elevation to provide a distinction with the listed building, it does not successfully overcome the substantial harm to the listed building and its setting. The heritage benefit of restoring and converting the building may offset some of the harm, but still does not successfully overcome the substantial harm to the building's setting, to which I must give great weight and consideration.

In terms of the new terrace and its impact on the conservation area and the setting of the locally listed building immediately west and south of it, I would give some townscape merit to its design as it does respond to the High Road in terms of scale and design of the new stadium. Arguably, it provides some degree of enhancement to the setting of the High Road by providing a continuous elevation, as the locally listed buildings currently provide. However, this does not reflect the character of the High Road itself. As such, the limited level of townscape enhancement provided by the high quality design of the new terrace does not overcome the substantial harm caused by the demolition of the locally listed buildings or the impact on the conservation area or to its setting.

Public realm

The proposed public realm, beyond the Tottenham Experience, is at nearly three storeys height accessed from street level. This would leave what appears to be a wide pavement branded in the alterative grey and white stripes along the High Road itself. Whilst the public square itself may be bigger than the area of Trafalgar Square with many facilities, this does not interact or contribute to the conservation area, the listed and locally listed buildings within it, or its historic context. Most of it is along the southern edge of the Stadium, along Park Lane, again at three storeys. As such the proposed 'pavement widening' would neither preserve nor enhance the High Road and by virtue of its apparent height and finishing would cause some harm to the conservation area, its setting and the listed and locally listed buildings within it. There are no heritage benefits presented by the public realm that could outweigh the less than substantial harm, to which I must give great regard and consideration.

Hotel

The scheme further proposes a 22 storey hotel at the south western corner of the stadium. Described as 'blade shaped' in the Planning Statement (5.17) and 'Shard like' in the Design Statement, the building does provide a 'sharp' edge at the southern end of the stadium. Paragraph 4.2.46 of the applicant's Heritage Statement states that 'In views north along the High Road its narrow southern end would form an elegant marker, forming a pleasing contrast between its vertical line and the horizontal emphasis of the proposed stadium'.

Whilst I agree that the views of the sharp edge of the hotel would be elegant when viewing from the south of High Road, the structure would introduce a scale and form that is unprecedented in this part of the conservation area. As such the structure would have an impact on the setting of the conservation area and the setting of the designated and non-designated assets within it such as the locally listed buildings on Park Lane. Additionally, the wider elevation of the Hotel would, along the High Road, create a slab like structure rising behind Warmington House and the new terrace proposed. Whilst the height of the stadium is offset from the immediate vicinity of the listed building, the height and width of the Hotel would have a direct impact on the setting of the listed building and contribute to its diminishing prominence on the High Road. As such, it would not preserve or enhance the setting of the listed building and would cause substantial harm to it. Additionally, it would cause some harm to the setting of the conservation area. By virtue of its height, the hotel would also be visible from the Alexandra Palace Park and may also be visible from Bruce Castle Park and would cause some harm to their setting, but only with respect to views.

I, therefore, disagree with Paragraph 4.2.48 of the Heritage Statement which concludes that the Hotel would not have a negative impact on the significance of the listed buildings within its immediate vicinity. I further disagree with paragraph 4.2.49 states that the hotel would not harm the significance of Warmington House as its setting has been entirely lost; and that the Tottenham Expereince terrace would in fact enhance its setting and visually integrate it with the larger scale Stadium and Hotel.

Whilst it may be an attractive addition from the southern end to the skyline and may provide some level of enhancement to the setting of the conservation area, it does not overcome the less than substantial harm to its setting or the substantial harm to the listed building and its setting. There are no demonstrable heritage benefits of the Hotel that could outweigh the respective degree of harm caused due to its scale and visual impact on the listed building, the conservation area and their setting.

Reserved matters: Extreme Sports Centre and residential towers

The scheme further seeks outline permission for a cluster of residential towers on the southern edge of the stadium. These would include two 16 storey, one 24 storey and one 32 storey towers sitting above the three storey podium, resulting in effectively 19, 27 and 35 storey towers. Whilst materials are subject to reserved matters, the towers are likely to be clad in masonry materials such as brick, terracotta or concrete. In terms of their design, appearance and materiality, the towers would form a coherent group.

Additionally, the scheme proposes an Extreme Sports Centre over 51 m tall (17 storeys) with a dynamic form to accommodate both outdoor and indoor facilities that would create a 'unique destination to bring sports enthusiasts and activate the precinct on non-match day' (10.1.1, Design Statement).

From a conservation point of view, the proposed towers together with the Hotel, would form a cluster of tall buildings and would introduce a scale and form unprecedented within the setting of the conservation area. Residential towers were consented as part of the previous scheme but these were up to 20 storeys with top floors receding in a manner that the tallest elements were closest to the stadium. As such the new scheme introduces a higher and, therefore, more intrusive set of towers that would neither preserve nor enhance the significance of the conservation areas, the listed and locally listed buildings or their setting, causing harm. Given the context of the stadium and the previous consent, I consider the harm to be less than substantial.
With respect to justification, there appears to be no heritage or townscape based evidence that justifies the positioning, location or the height of the proposed towers. Whilst there is merit in the design of these towers, this would not outweigh the less than substantial harm.

Additionally, whilst the visibility of the proposed cluster of towers from Bruce Castle is limited there would be an impact on the Conservation Area albeit less than substantial. This harm, however, would not be offset by any heritage benefits.

The visibility of the towers would be more extensive from Alexandra Palace Park, given the topography and the cluster would have an impact on the Alexandra Palace Park Conservation Area and the Historic Park. However, it would still be less than substantial and given their distance, context of the stadium and beyond, would be overcome by design and townscape (mainly skyline) benefits.

Outside the borough boundary, the proposed cluster of towers would also have an impact on the Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield. Whilst this should be assessed by Enfield Council separately, in my assessment I consider that given the distance and the alignment of the street, the cluster would have minimal impact on the conservation areas. If at all visible, the existing towers such as Brooke House would mitigate the potential impact of the new towers as they would form a backdrop to already existing higher blocks in the vicinity. I therefore, conclude that with regards to the two nearest conservation areas in Enfield, the impact of the towers would be negligible.

Conclusion

The stadium development is undoubtedly one of the largest development schemes on the High Road which has the potential to provide wider regeneration benefits and attract many investments and visitors to the area. In my opinion, I would describe it as 'football led' regeneration, with other leisure facilities to compliment it.

The new scheme has merits in several ways, high quality design being one of them. However, in my opinion, the scheme proposes a much greater degree of intervention than the previously consented

scheme. This includes further loss of historic buildings (in addition to the demolished buildings as part of the pervious consent- part implemented) and impact on the listed, locally listed buildings and the conservation area and their setting. The introduction of the cluster of towers would also cause further harm introducing an urban form and scale unprecedented in the area. I conclude that overall, the proposal would lead to loss of significance of heritage assets and their setting, causing substantial harm to them and would not provide any heritage benefits that would outweigh this harm.

In making the above assessment, I have given great weight to the preservation or enhancement of the heritage assets as per the Council's statutory requirement. I consider the scheme unacceptable from a conservation point of view.

Nairita Chakraborty

Principal Conservation Officer

25th November 2015

Argles James

From: Planning Support
Subject: FW: HE Response to HGY/2015/3000 and HGY/2015/3001.

Historic England | 1 Waterhouse Square
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Mr Neil McClellan
London Borough of Haringey
Planning, Regeneration and Economy
Level 6 River Park House, 225 High Road
Wood Green
London
N22 8HQ

Our ref: P00479068

20 November 2015

Dear Mr McClellan

TOTTENHAM HOTSPUR FOOTBALL CLUB, 748 HIGH ROAD , LONDON, N17 0AP

Thank you for formally consulting us on the submitted proposals. Historic England considered the proposals in detail at pre-application stage, and we provided detailed comments following the presentation of the scheme by the applicants to our London Advisory Committee in June.

The submitted proposals are broadly similar to the proposals we considered and commented on at pre-application stage, so I have enclosed our pre-application advice letter from 3 July. The issues raised in that letter remain valid for the current submitted application, and therefore the advice set out here should be considered in conjunction with the 3 July letter.

However, information contained within the supporting documentation submitted with the current application confirms further areas of harm that we did not comment upon previously. You will be aware that we are of the view that the demolition of the unlisted buildings of merit in the conservation area causes substantial harm to its significance. We note that the GLA shares this assessment. The further supporting documentation submitted with the application demonstrates additional impact on the settings of the North Tottenham Conservation Area and the Bruce Castle Conservation Area, where the proposed tall hotel and residential buildings would dominate a skyline currently characterised by a traditional building scale and cause serious visual harm in a number of views from within the conservation areas.

In addition, we acknowledge that some aspects of the proposed design of the 'Tottenham Experience' range have been improved. However, our view remains that the design approach to encase the grade II listed Warmington House on three sides within a much larger modern development would cause substantial harm to the setting of that grade II listed building for the reasons we set out in detail in our letter dated 3 July, 2015.

Finally, we accept and support the obvious need for any new stadium development to conform to current crowd safety standards. However, we are not convinced that the demolition of the three unlisted buildings of merit is the only way to ensure a crowd safety compliant design. We have seen no hard evidence to demonstrate that employing stewarding and crowd management to ensure crowd flows through the 'canyon' in the consented proposals would be effective. We therefore do not believe that it has been demonstrated that the substantial harm to the conservation area caused by the demolition is necessary as required by paragraph 133 of the NPPF.

In summary, Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to

preserve the setting of a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done.

Yours sincerely
Michael Dunn
Principal Inspector of Historic Buildings and Areas

Argles James

From: Planning Support
Subject: FW: LAC comments on pre-app referred to in HE response

HGY/2015/3000 & 3001

Mr Peter Riddington
Donald Insall Associates
12 Devonshire St
London
W1G 7AB

Direct Dial: 020 7973 3774

Our ref: PA00381790

3 July 2015

Dear Mr Riddington

Request for Pre-application Advice

TOTTENHAM FOOTBALL CLUB STADIUM , HIGH ROAD, LONDON, N17

Thank you for presenting the emerging proposals for the Tottenham Hotspur Football Ground to our London Advisory Committee. The Committee considered the issues in detail, and their views have informed this response. We noted in your presentation that the scheme is still under development and considerable further changes may be proposed, such as a large addition to the residential elements. You asked us to ignore those for the time being, so, to be clear, the following is only our advice in respect of the documents you provided to us prior to the meeting.

Summary
Historic England accepted the justification put forward for the consented redevelopment of the existing stadium and the consequent harm to the historic environment of North Tottenham because we acknowledge the benefits arising from retaining the football club in its historic location. We judged that this benefit, alongside others, could outweigh the harm and therefore supported the proposals consented in 2010 which delivered this aim. Revised proposals which involve additional harm to the historic environment will have to demonstrate that such harm is necessary in order to deliver further benefits that decisively outweigh that harm which are in addition to those delivered by the consented scheme.

The revised proposals involve the demolition of three locally listed buildings that make a positive contribution to the special character and appearance of the North Tottenham Conservation Area. In addition, whilst the grade II listed Warmington House is retained, development immediately adjacent and to its sides and rear will harm its setting and the contribution this makes to the significance of the building as a formerly detached villa. Separately and cumulatively these changes would, in our view, result in substantial harm both to the listed building and the conservation area. The current proposals also involve the provision of a hotel building 24 storeys high to the south of the stadium and positioned within the conservation area. The full impact of this part of the proposals has not yet been established, but from the information currently provided our view is that there is potential for further significant harm. This harm arises from the scale of the new development which both fails to respond appropriately to the existing grain and character of the conservation area and may potentially have significant impacts on the setting of other designated heritage assets.

On the basis of the information we have at present, Historic England is not persuaded that this additional and cumulative harm to the historic environment of Tottenham is necessary to achieve the public benefits currently identified. Furthermore, we are not persuaded that those benefits are of a scale that could be described to decisively outweigh this further harm. Our current view is that, given the nature and extent of the harm and the lack of convincing justification, the proposals are clearly contrary to Government objectives for the delivery of

sustainable development. Should an application be submitted in its current form we will give careful consideration to advising the Secretary of State to call-in the application for his own determination.

Historic England Advice

Our statutory remit is the impact of the proposals on the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national planning policy as to whether the proposals harm, retain or enhance this significance.

Significance of the historic environment

The special character of the North Tottenham Conservation Area is well understood. In summary, this character is derived from the ancient linear form of Tottenham High Road and the historic buildings that line it. The group of historic buildings at the south-west corner of the stadium site illustrate the historic development of this part of Tottenham from the late Georgian to the Edwardian periods, and are attractive and interesting historic buildings in their own right. Warmington House is grade II listed, and is a detached residential property, set back from the High Road as was typical of the period, dating from 1828. The other three buildings are locally listed from the late 19th and early 20th centuries. As a group, the buildings are significant and contribute strongly to the character of the conservation area.

The proposals and their impact

Based on the information we have seen, the current proposals are for the demolition of the existing stadium and its replacement with a larger stadium with a capacity similar to that of the consented scheme. The principal entrance to the new facility will be from the south, via a public space at podium level. The footprint of the new stadium is slightly larger than the consented scheme and more oblong in shape, which results in more of the stadium's western elevation being closer to the High Road. The previous podium concept and western drop off entrance broadly reflect the consented proposals.

Adjacent to this is a mixed use retail and museum building, which occupies the site where the three locally listed buildings are currently located. Warmington House will be retained and restored as part of the museum, its flank elevations abutting new buildings of the same height fronting Tottenham High Road. The rear elevation of the listed building will be encased within a new glass extension. As with the consented proposals, the development would also include private housing, which would be located in the south east corner of the site but has not yet been considered in any detail. A new element comprising a 24 storey hotel is intended to form a visible gateway into the site from the south.

Policy Context

Both Section 16 and Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 impose a statutory duty upon local planning authorities to consider the impact of proposals upon listed buildings. It states that the determining authority, 'shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'.

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) sets out the obligation on local planning authorities to pay special regard to preserving or enhancing the character or appearance of conservation areas and to preserving the settings of listed buildings.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development', where conserving heritage assets in a manner appropriate to their significance is one of the 12 core principles. NPPF policy advises that for new development to be sustainable it needs to encompass an economic, social and environmental role, with the latter (paragraph 7) including the protection and enhancement of the built and historic environment. Paragraph 8 notes that these roles are mutually dependent and should not be taken in isolation; and that to achieve sustainable, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.

Section 12 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear at paragraph 132 that when considering the impact of a proposed development on a heritage asset (which includes its setting), 'great weight' should be given to preserving its significance. Any harm or loss should require a 'clear and convincing justification' (emphasis added).

Section 7 sets out policies requiring good design, and states in paragraph 58 that local authority policies should ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials.

Both the Mayor's Plan and Haringey's local plan include policies that seek to safeguard the significance of listed buildings and preserve or enhance the character or appearance of conservation areas.

Historic England position
The proposals will radically alter the setting of the grade II listed Warmington House. This 1828 detached villa is set back from the High Road, reflecting the pre-Victorian development pattern of the area. The current proposals to construct new structures hard against its flank elevations remove all sense of the house's original character as a detached villa. The spaces either side contribute to the understanding of the significance of the villa building type, and the recent removal of the ad hoc terrace enhanced the setting of the listed building. The rear garden will be encased in a glass box structure with a glazed roof at the same height as the parapet, with the rear elevation forming part of a new atrium. Whilst the front and rear elevations and interiors will be repaired and restored, the new development on either side will result in the listed building enveloped within a much larger modern development, and appearing as an illegible remnant of the historic High Road development. In our view, these proposals cause substantial harm to the grade II listed building by radically altering its setting (NPPF paragraph 132).

We are also concerned about the demolition of the locally listed buildings north of Warmington House, which are attractive in their own right and contribute positively to the listed building and the wider conservation area. Together the buildings (Nos. 746, 748 750) form a visually pleasing and architecturally varied group of buildings dating from the late 19th and early 20th centuries. Together with Warmington House they illustrate the High Road's historic development and form a notable group of historic buildings adjacent to the current stadium. Historic England believe that the buildings are integral to the significance of the conservation area and their demolition would result in substantial harm to the conservation area as the designated heritage asset.

The proposed tall building at the south east corner of the site has the potential to cause further serious harm to the conservation area and the setting of nearby listed buildings. Although no visual impact assessments have been carried out in detail at this stage, it is clear that this building, at 24 stories (92.5m AOD) is greatly out of scale with the much lower heights of historic buildings that are its immediate neighbours and which contribute positively to the significance of the conservation area. This extreme contrast in height would be very noticeable in views within and beyond the conservation area, resulting in the new tower visually dominating the traditional built form that contributes to the character of the conservation area and should be preserved or enhanced.

The NPPF requires that harm to the historic environment on the scale set out above requires clear and convincing justification and is necessary to achieve substantial public benefits that outweigh the harm. We accept that the stadium proposals will deliver a range of public benefits, but we note that many of these would be achieved with the previous consented proposals. Further harm cannot be justified on these grounds alone, unless there is something demonstrably unviable or now non-compliant about the previous proposals.

Other benefits being put forward to justify the harm are, in our view questionable. Securing the restoration and re-use of other listed buildings in the ownership of the club could be readily delivered without causing further harm elsewhere. The harm being caused is not necessary to deliver this benefit. Introducing a stronger linear development is not a public benefit that helps justify the harm to the historic environment. Whilst emphasising the linear pattern of development along the High Road may make sense in general urban design terms, the existing historic buildings on this site currently fulfil this role, albeit as four detached buildings with varying setbacks. Historically, there was never an unbroken line of development along a common set back here. In our view, the consented stadium, set slightly further back and curving away from the High Road, with the historic buildings retained at the southern end, causes less harm to the conservation area and settings of listed buildings than the proposed stadium development.

The retention of the historic buildings to the south west of the stadium does not appear to preclude the redevelopment of the site or the provision of safe movement in and out of it. We understand that the consented proposals are 'compliant' in terms of crowd safety management. Whilst the amended proposals may further ease

the movement of crowds through the provision of a wider pavement, on the basis of the information submitted thus far we are not convinced that this issue clearly justifies the further harm caused by demolition in that it is necessary as required by paragraph 133 of the NPPF.

Recommendation

In summary, no clear and convincing case has yet been made to demonstrate that the substantial harm to the significance of Warmington House and to that of the conservation area is necessary to deliver any additional public benefits over and above those which the consented scheme would deliver. The proposals fail to preserve the setting of a listed building, and neither preserve nor enhance the character or appearance of the conservation area, and are therefore on current information and understanding contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England therefore raises strong objection to these pre-application proposals based on the current information. If the proposals become the subject for applications for listed building consent and planning permission, we will strongly advise that the applications are refused. If Haringey Council or the Mayor of London were minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the current lack of any policy support for the harm done.

Yours sincerely

<image001.png>

Michael Dunn

Principal Inspector of Historic Buildings and Areas

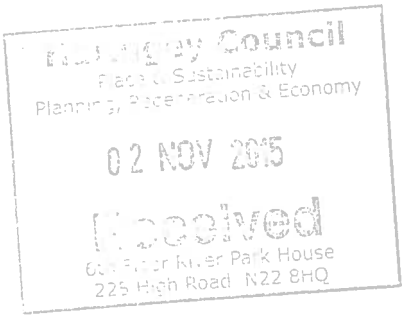
cc: Stephen Kelly, LB Haringey; Stewart Murray, GLA

GREATER**LONDON**AUTHORITY

Development, Enterprise and Environment

Neil McClellan
Haringey Council
Regeneration, Planning & Development Directorate
Planning Service
6th Floor, River Park House
225 High Road, London
N22 8HQ

Our ref: D&P/2292g/01/MJ
Your ref: HGY/2015/3000
Date: 28 October 2015



Dear Mr McClellan

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 Northumberland Development Project (Tottenham Hotspur Stadium)

I refer to the copy of the above planning application, which was received from you on 21 September 2015. On 27 October 2015, the Mayor considered a report on this proposal, reference D&P/2292g/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan, for the reasons set out in paragraph 199 of the above-mentioned report; however the possible remedies that could address these deficiencies are set out in that paragraph. Notwithstanding paragraphs 79 to 105 of the report, the Mayor expressed the view that the loss of non-designated heritage assets, including the former 'Dispensary' (746 High Road), the 'Red House' (748 High Road) and the former 'White Hart Public House' (750 High Road) is not justified, and furthermore, that these buildings should be retained in the scheme. Consequently, the applicant should review the proposals in order to incorporate these buildings into the scheme.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose

and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is James Forrest, e-mail jamesforrest@tfl.gov.uk, telephone 020 3054 7090.

Yours sincerely,



Colin Wilson
Senior Manager – Development & Projects

cc Joanna McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
David Roach, DP9, 100 Pall Mall, London SW1Y 5NQ

GREATER**LONDON**AUTHORITY

planning report D&P/2292g/01

27 October 2015

Northumberland Development Project (Tottenham Hotspur Stadium)

in the London Borough of Haringey

planning application no. HGY/2015/3000

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

A hybrid application comprising demolition and comprehensive phased redevelopment:

Full planning permission is sought for the new Stadium (Class D2), (59 metres AOD); a hotel (Class C1) of 22 storeys (100 metres AOD); Tottenham Experience building (sui generis) of 3 storeys; and surrounding public realm, including a podium square to the south of the Stadium and a new Plaza at the south-west corner of the site.

Outline planning permission is sought for an Extreme Sports centre (Class D2) (62 metres AOD); community space (Class D1) and/or offices (Class B1); housing (Class C3); and 3 storey health centre (Class D1). The residential buildings include two 19 storey buildings (69 metres AOD), a 27 storey building (105 metres AOD) and a 35 storey building (131 metres AOD). Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and/or office building. Details of "appearance" and "scale" are reserved in relation to the Extreme Sports centre building. Details of "appearance" are reserved in relation to the health centre building.

The proposal includes the demolition of three locally listed buildings and includes works to a Grade II listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001).

The applicant

The applicant is **Tottenham Hotspur Property Company Ltd**; the architects are **Populous, Allies and Morrison**, and **Donald Insall and Associates**; and the agent is **DP9**.

Strategic issues

The proposed development is strongly supported in principle; however issues with respect to **housing; affordable housing; historic environment and loss of heritage assets; urban design and tall buildings; inclusive design; transport; climate change;** and **air quality** should be addressed before the application is referred back to the Mayor at his decision making stage. The phasing of the full and outline elements should also be clarified. Policies on **regeneration and economic development; mix of uses and town centre uses; sports and recreation;** and **visitor infrastructure** are also relevant to this application.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 199 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 21 September 2015, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 30 October 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) of the Schedule to the Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site occupies an area of 8.97 hectares. The southern site boundary runs along the southern pavement of Park Lane, from Park Lane's junction with Vicarage Road in the east, to Park Lane's junction with the High Road in the west, at which point it turns south following the building line of 732 High Road until the public conveniences on the east side of the High Road, where it crosses to the western side of the High Road.

7 The western site boundary runs along the rear edge of the western pavement of the High Road, from the point at which the boundary crosses the High Road in the south, to White Hart Lane in the north. The boundary then crosses the High Road and continues up the front edge of the eastern pavement of the High Road to the junction with Northumberland Park.

8 The northern boundary is largely formed by the boundary with Lilywhite House (comprising the Sainsbury's foodstore fronting Northumberland Park; Tottenham University College; and Tottenham Hotspur Football Club's administrative offices), which runs from Worcester Avenue in the east to the edge of the Sainsburys service car park to the rear of 792 High Road (Dial House) in the west. The boundary then extends northwards up to Northumberland Park, including 794 - 814 High Road, but excluding 790-792 High Road.

9 The eastern boundary runs along the eastern pavement of Worcester Avenue from Park Lane in the south to Northumberland Park in the north. The site boundary extends across the road to the pavement on the western side of the road but does not include 1-41 Worcester Avenue.

10 The majority of the site is currently occupied by the existing White Hart Lane Stadium, which is located to the south east of the site, bounded by Worcester Avenue to the east and Park Lane to the South. The current Stadium has a spectator capacity of 36,237, with four stands built in the 1980s and 1990s, of up to 24 metres in height (equivalent to 7-8 residential storeys).

11 To the west of the Stadium, fronting on to the High Road, are a series of buildings, including the single storey Football Club's merchandise store, located immediately west of the Stadium on the junction of High Road and Park Lane, which has a temporary planning permission. North of this, 744 High Road 'Warmington House' is a Grade II listed three storey building (circa 1828) of brick and stucco, now vacant and boarded up. To the north of this is 746 High Road, the 'Dispensary', a locally listed three storey building (circa 1910) of stone and red brick, also vacant and boarded up. To the north, on the corner with Bill Nicholson Way, is 748 High Road, the 'Red House', a locally listed three storey Victorian building of red brick. On the opposite corner of Bill Nicholson Way is 750 High Road, 'Valentino's', a locally listed three storey Victorian former public house (The White Hart) of brick and render, currently vacant.

12 The site is hoarded along the High Road to the north of this, up to Lilywhite House and Dial House. The buildings previously on this site were largely demolished under a previous planning permission for the development of a new Stadium (LPA ref: HGY/2010/1000), including the Grade II listed 774 High Road (Fletcher House) and locally listed 752-766 High Road. The land behind this hoarding included the Archway Metals buildings, which have now been demolished, with the rest of this part of the site currently subject to site clearance and preparatory ground works associated with the previous planning permission.

13 Dial House (Grade II* listed), located at 790 High Road, and the adjacent property at 792 High Road (Grade II) do not form part of the application site. To the north of this, the 'Northern Terrace' includes 794, 796, 798 – 802 High Road, a continuous brick terrace of three storeys dating from the mid-eighteenth century. The buildings are set back from the High Road, each having a front forecourt and boundary treatment. They are all statutorily Grade II listed apart from 796, 'Percy House', which along with its forecourt, walls and railings, is Grade II* listed. Percy House has recently been the subject of an approved application by the Tottenham Hotspur Foundation (a charity founded and associated with Tottenham Hotspur Football Club), which will refurbish the building as a community facility.

14 To the north, 804 and 806 High Road is a three storey brick terrace with shops at ground floor level, not listed or locally listed. To the north, 808 and 810 High Road are a pair of Grade II* listed three storey red brick eighteenth century buildings set back behind railings. To the north, 814 High Road is a locally listed, mid-nineteenth century, two storey red brick building, located on the southern corner of the High Road and Northumberland Park.

15 The wider area is primarily residential, with a wide range of housing types and dates, including Victorian terraces and larger scale post-war blocks. Commercial and community uses line the High Road. Immediately to the east of Worcester Avenue is Northumberland Park Community Secondary School, and St. Paul and All Hallows Church of England Infant and Junior Schools. Immediately to the west of High Road lies St. Francis de Sales Roman Catholic Infant and Junior School. The site is located in Northumberland Park Ward, which has significant levels of deprivation and higher rates of unemployment than in the rest of Haringey.

16 The administrative boundary with the London Borough of Enfield lies approximately 500 metres north of the site.

17 The site is within an area of regeneration, as identified by the London Plan and Haringey Council. It is within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone.

18 The west section of the site, fronting onto the High Road, forms part of the North Tottenham Conservation Area.

19 The site is bounded by the A1010 High Road to the west, which is part of the strategic road network (SRN); however the nearest part of the Transport for London Road Network (TLRN) is the A10 at Bruce Grove.

20 There are ten bus routes serving the area, with bus stops on the High Road and Northumberland Park. White Hart Lane station is approximately 200 metres to the west and provides access to London Overground services to Liverpool Street, Enfield Town and Chestnut stations. Northumberland Park station is approximately 600 metres to the east and provides access to rail services on the Tottenham Hale branch of the Lea Valley line. The nearest Underground station is Tottenham Hale on the Victoria Line, approximately 2.2 kilometres to the south-east. Although Seven Sisters is actually further away, at 2.6 kilometres to the south, it is however perceived as being more accessible to this area given the short bus interchange on Tottenham High Road and the direct walking route. The overall site records a public transport accessibility level of (PTAL) of 4 on a scale of 1 to 6, where 6 is classed as excellent.

21 Cycling Superhighway 1 (CS1), currently under construction, will link this area to the City. It will avoid major roads and will provide a new alternative route with improved cycling facilities.

Details of the proposal

22 The Development comprises a hybrid planning application for the demolition of most structures on the site and comprehensive redevelopment. The floorspace is summarised as follows:

Land Use	Use Class	Area GIA (sqm)	Units
Leisure (including stadium)	D2	122,045 (max)	n/a
Residential	C3	49,000	585 (max)
Sui Generis / Tottenham Experience	Sui Generis	4,311	n/a
Business	B1	4,000 (max)	n/a
Community and Culture	D1	6,000 (max)	n/a
Hotel / Serviced Apartments	C1	18,820	229



Illustrative image (full and outline elements)

Full Planning Permission:

The Stadium (D2 Use)

23 A 61,000 capacity Stadium of up to 59 metres in height, including a football pitch able to retract beneath the southern stand, revealing a hard surface space to cater for American Football matches for the National Football League (NFL), concerts and a range of other events. It is intended that the Stadium will host up to 10 (non-Tottenham Football Club) sports events and 6 non-sports events per annum. The Stadium is wrapped with a sculptured mesh wrap, apart from the south stand which has a glass facade. The south stand includes a five-storey atrium space with catering outlets. A 'sky walk' attraction will allow visitors to climb the exterior of the south stand allowing views across London. Conference and banqueting facilities are also provided.

24 A Stadium 'front door' is included on the High Road, with a projecting escalator box above. Adjacent to this to the north is a 'media café', also fronting on to the High Road. An entrance to the east stand is provided onto Worcester Avenue.

25 A high level bridge is proposed to link the existing Club offices on level 4 of Lilywhite House to level 5 of the Stadium.

26 Match day car parking with 319 spaces is located beneath the stands and in the basement, accessed from the High Road and Worcester Avenue. A new covered service area is also included.

'Tottenham Experience' (Sui Generis)

27 This multi-use facility, located at the south-west corner of the site facing onto the High Road, immediately to the south of the Stadium, will provide a new visitors' centre for the Stadium. The Grade II listed Warmington House will be incorporated. Steps to the rear of the building lead to the new southern terrace, with the ground floor of the building extending

underneath the terrace. Areas of the roof of the building are proposed to be publically accessible. The uses within the building comprise the following:

- Museum and learning facilities, including a Museum of Tottenham Heritage, and a Club Museum. It will also allow for the incorporation of key elements of the three buildings that are proposed to be demolished (746, 748 and 750 High Road).
- Club shopping space.
- A cinema space, which will form part of the Club Museum and Stadium tour, also providing a venue for private screenings and local community events.
- Ticketing area for Stadium event tickets, Stadium tour tickets, and a changing area for the 'sky walk'.
- A cafe with rooftop seating.
- A rooftop events space.

Hotel and serviced apartments (C1 Use)

28 A 22 storey (89 metre) glass-clad 'blade' shaped hotel is proposed in the south-west corner of the site at the junction of the High Road and Park Lane, on a broadly north-south axis to the east of the 'Tottenham Experience', and integrated with the Stadium podium on its north and east elevations. The hotel will have 180 bedrooms on floors 3 to 14; 49 serviced apartments on floors 15 to 21; restaurants, bars, workspace, gym, swimming pool and corporate facilities on the lower floors; a foyer restaurant and roof-top bar on the top floor; and a 76 space basement car park accessed from an entrance in the 'Tottenham Experience' building from the High Road. A coach and car/taxi drop-off point is proposed to the south of the hotel entrance on Park Lane.

The Public Realm

29 The public realm stretches around all sides of the site, integrating the Stadium with the other buildings in the southern development and the community health centre. It consists of new streetscapes running along the perimeter of the site on the High Road, Park Lane and Worcester Avenue, as well as areas of podium to the north and south of the Stadium. The north and south podiums are linked to the surrounding street by wide stairways and external lifts.

30 The High Road footpaths are widened and planted with Plane trees; Worcester Avenue is proposed to become a shared surface with tree planting; and widened footpaths and tree planting are proposed along Park Lane.

31 The 'South Podium Square' (the size of Trafalgar Square) is a multi-use space incorporating a new public square, which is intended to host a variety of sports and community uses. The space includes a series of 'islands' around ventilation shafts serving the car parking areas, which provide seating, trees and planting; a 'jumping jet' water fountain; a multi-use games area (MUGA); and cafe seating areas. It is envisaged that the Tottenham Hotspur Foundation will operate a series of programmes and initiatives that will use the podium space on non-event days.

32 A new ground level 'Plaza' is proposed on the south-west corner of the site, at the junction of the High Road and Park Lane, providing a new gateway to the Stadium.

33 The development also includes a number of alterations to existing highways, including reconfiguring the junction between the High Road and Park Lane, the junction between Park Lane and Worcester Avenue, the stopping up of Bill Nicolson Way and Paxton Road, and the realignment and resurfacing of Worcester Avenue.

Outline Planning Permission:

'Extreme Sports Centre' (D2 Use)

34 Situated on the eastern side of the proposed hotel and forming the eastern edge of the proposed Stadium entrance plaza on the south-west corner of the site. The building (approximately 55 metres in height) will include a range of sporting activities, with indoor and outdoor climbing walls, and the opportunity to incorporate a scuba diving tank. At the lower levels of the building, high performance activities are proposed, such as speed, agility and reaction tests, and it is intended that the centre can be used by local schools and training centres.

35 The application seeks outline consent, with full details submitted for access to the building, the layout and the surrounding landscaping. Detailed matters relating to scale and appearance are reserved.

Southern Residential (C3 Use) and Flexible Community/Leisure/Office (Use Class D1/D2/B1)

36 The Southern Residential component is proposed in the south-east corner of the site, fronting both Park Lane to the south and Worcester Avenue to the east, providing up to 585 residential units in four buildings above a three storey podium building. The buildings include two 19 (above ground) storey buildings, a 27 (above ground) storey and a 35 (above ground) storey building. Five three bedroom townhouses are also proposed fronting onto Park Lane.

37 The residential component will be served by 270 car parking spaces within the podium structure, located in two lower basement levels, ground floor and first floor level, accessed from Worcester Avenue.

38 Within the plinth beneath the residential blocks, up to 3,500 sq.m. (GIA) of flexible floorspace is proposed at ground, first and second floor level. In the event that a district wide energy network has not been delivered by the time this element of the scheme comes forward, this area could also accommodate a site wide energy centre.

39 The application seeks outline planning permission for this element, with full details submitted for layout, scale and access, with matters relating to appearance and landscape reserved for approval at a later date. A Residential Design Code has been submitted covering the internal layout and the appearance of the residential buildings, including the 'plinth' (two basement and three above ground levels beneath the four residential towers).

Community Health building (Use D1)

40 A new two storey (maximum 21 metres) community health building is proposed in the north-east of the site, fronting onto Worcester Avenue, with health uses at first and second floor levels. The ground floor will provide a goods yard and main servicing entrance to the Stadium. The stairs and lift to the northern podium wrap around the southern end of the building.

41 The application seeks outline planning permission for this element, with full details submitted for layout, scale, access and landscape, with matters relating to appearance reserved for approval at a later date.

Case history

42 The application site is the subject of an extensive planning history. The most relevant planning history is largely focused on four principal planning permissions:

- Part full and part outline permission was granted in September 2011 (LPA ref: HGY/2010/1000), for the redevelopment of the site including a new Stadium (capacity 56,250) and associated development to the north (mixed use building with car parking at ground floor level, retail foodstore, office and hospitality Stadium-related development) and the south (up to 200 residential units in a building of up to ten storeys, up to 1,000 sq.m. of office floorspace, and a hotel of up to 150 bedrooms). Demolitions have taken place associated with related Conservation Area and Listed Building Consents.
- Full permission was granted in March 2012 (LPA ref: HGY/2011/3250) for the northern part of the site comprising foodstore, education, Stadium-related and showroom/brand centre uses. This permission has been fully implemented.
- Outline permission was granted in March 2012 (LPA ref: HGY/2011/3251) for the southern part of the site for 285 residential units in four blocks, and 15,000 sq.m. of space for college, health club and office uses.
- A minor material amendment was granted in July 2015 (LPA ref: HGY/2015/0964), to accommodate a new basement, changed ground floor layouts, and the removal of certain conditions.

43 Pre-application discussions have been held on the current proposals with the Council; the GLA; and TfL since mid-2014.

Strategic planning issues and relevant policies and guidance

44 The relevant issues and corresponding policies are as follows:

• World city role	*London Plan; London Planning Statement*
• Economic development	*London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*
• Regeneration	*London Plan; the Mayor's Economic Development Strategy*
• Employment	*London Plan*
• Tourism/leisure	*London Plan*
• Culture	*London Plan; Mayor's Cultural Strategy*
• Health	*London Plan; Social Infrastructure SPG; Health Inequalities Strategy*
• Mix of uses	*London Plan*
• Town centre uses	*London Plan; Town Centres SPG*
• Housing	*London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG*
• Affordable housing	*London Plan; Housing SPG; Housing Strategy*
• Density	*London Plan; Housing SPG*
• Historic Environment	*London Plan*
• Urban design	*London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG*
• Tall buildings	*London Plan*
• Inclusive design	*London Plan; Accessible London: achieving an inclusive environment SPG*
• Transport	*London Plan; the Mayor's Transport Strategy*
• Parking	*London Plan; the Mayor's Transport Strategy*

• Crossrail	*London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
• Climate change	*London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
• Air quality	*London Plan; the Mayor's Air Quality Strategy*

45 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Haringey's Local Plan (2013), the Saved Policies within the Unitary Development Plan (2013), and the 2015 London Plan (Consolidated with Alterations since 2011).

46 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The 2015 draft Minor Alterations to the London Plan.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- The Tottenham Area Action Plan (Preferred Option Consultation) (February 2015).
- Tottenham High Road West Masterplan Framework (September 2014)
- Northumberland Park Strategic Framework Report (February 2015)

Principle of development

Regeneration and economic development

48 In policy terms, the development plan documents affirm Tottenham High Road as a strategic area for regeneration and support the allocation of the site for a Stadium-led mixed-use development, including some housing. The principle of redevelopment of the existing Stadium and the wider site has therefore been established by development plan policy and through the extant permission.

49 A development of this scale would accord with London Plan Policy 2.1 'London in its Global, European and UK Context', which aims to support London's unique strengths as a diverse world city, including culture and tourism. It would also contribute to the objectives for Outer London as set out in London Plan Policy 2.7 'Outer London: Economy' and Policy 2.16 'Strategic Outer London Development Centres', which specifically identifies the Upper Lee Valley for leisure, tourism, arts, culture and sports functions of greater than sub-regional importance.

50 The site lies within the boundary of the Upper Lee Valley Opportunity Area as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031 and with an indicative employment capacity of 15,000. Haringey Council's Local Plan identifies the site as part of the wider regeneration of Northumberland Park and its Tottenham Area Action Plan (Preferred Option Consultation) (February 2015) identifies the site for redevelopment of the existing Stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.

51 The entire site falls within a Regeneration Area (within the 20% most deprived areas), as identified by the London Plan, and the Northumberland Park Growth Area, as identified in Haringey's Local Plan. The Stadium redevelopment will assist the regeneration of this part of Haringey in accordance with London Plan Policy 2.14 'Areas for Regeneration'. The applicant estimates that the proposals will generate the following economic benefits:

- Up to an additional 700 full-time equivalent (FTE) jobs on-site, compared to the previously consented scheme which was estimated to have generated 370 FTE jobs;
- Up to 330 part-time jobs on event-days, an increase on the consented scheme of 30 part-time jobs;
- Up to £7.9m of household spending from the residential element;
- The introduction of at least two NFL American Football matches per year, with the potential to generate an additional £2.4m of spend each year within the Tottenham area;
- The music events within the Stadium, of which there would be up to 6 per year, has the potential to generate up to £12m of additional spend in the area;
- The hotel and serviced apartments have the potential to generate up to £560,000 of additional spend in the area; and
- The Extreme Sports Centre has the potential to generate up to £2.4m of additional spend in the area.

52 The wider regenerative potential of placing an iconic new Stadium in this part of London, together with a high quality housing development, hotel, visitor attractions, and new high quality public realm are also recognised. The proposals are supported in line with London Plan policies on regeneration and economic development.

Mix of uses and Town Centre uses

53 London Plan Policy 2.15 'Town Centres' promotes town centres as the main focus for commercial development and intensification, including residential development. Policy 4.7 'Retail and Town Centre Development' requires that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport (the sequential test). The NPPF defines edge of centre as within 300 metres of a town centre boundary. Furthermore, Policy 4.7 requires proposals for new, or extensions to existing, edge or out of centre development to be subject to an assessment of impact.

54 The site is not within a town centre and the stretch of the High Road immediately to the west of the site, of which part lies inside the site boundary, has no formal designation as a town centre. Angel Edmonton, designated as a District centre, lies approximately 500 metres north of the site, and Bruce Grove town centre, designated as a District centre, lies approximately 700 metres to the south of the site. The site cannot therefore be defined as edge of centre. However, it is recognised that the High Road to the north and south of the site, as well as the west side of the High Road adjacent to the site, is lined by an almost continuous length of ground floor retail space, including town centre uses such as Council Offices, Tottenham Sports Centre and a Public Library to the south of the site.

55 The proposal includes a large area of uses that may normally be classified as town centre uses, including the 4,311 sq.m. 'Tottenham Experience' facilities (including retail, cafe and cinema space) identified in the application as 'Sui Generis'; up to 2,000 sq.m. of D2 leisure floorspace in the 'Extreme Sports Centre'; and up to 4,000 sq.m. of flexible space, which may comprise B1 business space or D1 non-residential institution floorspace.

56 To the extent that the sequential test applies, National Planning Practice Guidance and recent case law make it clear that in considering the availability of alternative sites as part of the sequential test, the relevant consideration is 'the proposal', which in this case is the development as a whole, while it is not appropriate to seek to disaggregate individual elements of the proposal to consider whether these could be accommodated elsewhere. Clearly, there is

no site within the vicinity that would allow a development of this scale and it is recognised that the football club has close associations with the site that should be retained.

57 With regard to the matter of impact, it is recognised that the scale and type of uses as part of the full application (Tottenham Experience and hotel) are strongly related to the Stadium, as is the Extreme Sports centre in the outline application, and are unlikely to have an impact on nearby own centres. Concerning the 4,000 sq.m. of flexible space in the outline application, the Council may require an assessment of impact as part of the subsequent reserved matters application, depending on the proposed use.

58 The site benefits from good transport connections, which will be improved further following upgrades and enhancements to services and station facilities at White Hart Lane and Tottenham Hale, which are due to be delivered by 2018.

59 The proposals are acceptable in relation to London Plan policies on mix of uses and town centre uses.

Sports and recreation

60 London Plan Policy 3.19 'Sports Facilities' supports development proposals that increase or enhance the provision of sports and recreation facilities, as does Policy 4.6 'Support for and Enhancement of Arts, Culture, Sport and Entertainment'. Policy 4.6 also requires a sequential approach to be fulfilled, that development should be located on sites with good existing or planned access to public transport, be accessible to all sections of the community, and address deficiencies in facilities. As discussed above, clearly, there is no site within the vicinity that would allow a development of this scale and it is recognised that the football club has close associations with the site that should be retained.

61 The application states that the Club is committed to hosting a series of community sporting events, activities and programmes each year within the Stadium for the benefit of local Haringey residents and the Extreme Sports Centre will also increase access to sports and recreational facilities, with opportunities to develop activities directly linked to the curriculums of local schools and colleges. The Extreme Sports Centre will also work in combination with a range of sports and recreational uses that will operate from the podium public space to the north, including the multi-use games area. This will also contribute to London Plan Policy 3.2 'Improving Health and Addressing Health Inequalities' in an area that suffers from high rates of obesity and other health problems. The proposed sports and recreation facilities are supported in line with London Plan policies.

Visitor infrastructure

62 London Plan Policy 4.5 'London's Visitor Infrastructure' seeks to achieve 40,000 net additional hotel rooms by 2036, of which at least 10% should be wheelchair accessible, as well as recognising the need for serviced apartments. Policy 4.5 also states that outside the Central Activities Zone, new visitor accommodation should be focused in town centres and Opportunity and Intensification Areas, where there is good public transport access to central London and international and national transport termini. Policy 4.5 also recognises that it may be appropriate to locate visitor accommodation near to major visitor attractions of sub-regional or greater significance where there is a clear link in scale, nature and location. As a site within an Opportunity Area, with good transport facilities and immediately adjacent to a major Stadium, the proposal to include a 180 bedroom hotel and 49 serviced apartments within the development is supported.

Social infrastructure

63 The outline element of the application includes a new community health building, and up to 4,000 sq.m. of community uses. London Plan Policies 3.16 'Protection and Enhancement of Social Infrastructure' and 3.17 'Health and Social Care Facilities' supports proposals that provide high quality health facilities in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Policy 3.16 also supports the provision of community uses.

64 The Tottenham area suffers from severe health inequalities and the Local Plan recognises that there is an increased requirement for health services in the north east of the borough, which includes Tottenham. The application also states that the football club will also host community sporting events, activities and programmes each year within the Stadium for the benefit of local Haringey residents. The proposals to provide health and community uses are supported in line with London Plan policies.

Residential

65 The outline part of the application proposes 585 new residential units. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. The site falls within the Tottenham Housing Zone, which has a target for almost 2,000 new homes. Policy 3.7 'Large Residential Developments' encourages such developments, including complementary non-residential uses, in areas of high public transport accessibility. The proposals for residential use are supported in line with London Plan policy.

Summary

66 The redevelopment of the site as a Stadium-led mixed use development is strongly supported in principle, given the reasons set out above.

67 The application materials indicate that the Stadium, Tottenham Experience building, and community health building will be constructed initially, with the hotel, Extreme Sports building and residential buildings completed in future phases. The applicant should clarify the phasing in relation to the outline application, which includes the community health building; and the full application which includes the hotel.

Housing

68 The residential part of the application is in outline form; however the indicative residential mix is as follows:

	Units	%
Studio	20	3%
One bed	268	46%
Two bed	268	46%
Three bed	29	5%
Total	**585**	**100%**

Affordable housing

69 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Haringey Council's own affordable housing policy requires relevant schemes to provide 50% affordable housing on a habitable room basis, subject to viability.

70 No detail has been provided on the affordable housing offer at this stage, although it is understood that an element of affordable housing will be provided. In accordance with London Plan Policy 3.12, the applicant will be required to demonstrate that the application delivers the maximum reasonable amount of affordable housing. As part of this, a viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.

71 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. Subject to the outcome of the viability assessment, the applicant will need to provide robust justification for any departure from this policy, including evidence to demonstrate that the proposed split is based on local need.

Housing Choice

72 The indicative mix of units provides only 5% family sized units, with 46% one-bed and 46% two-bed, although the split between tenures is not yet known. London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The inclusion of duplex/triplex townhouses at ground floor level is welcomed. It is recognised that a significant proportion of one and two bed units may be appropriate in high-rise blocks in this accessible location; however the proportion raises some concerns and the applicant and the Council should confirm that this would meet local housing needs.

73 The application states that the residential units will be built to Lifetime Homes standards and that 10% will be wheelchair accessible. Policy 3.8 requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan proposes to replace this with *"ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'"*. Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with *"ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users"*. This is set out in more detail in the Housing Standards Policy Transition Statement (May 2015), which sets out how the existing policies relating to Housing Standards in the London Plan should be applied from October 2015. The Council should secure these requirements by condition. Ideally, the reserved Matters should demonstrate on a plan which units will be 'wheelchair user dwellings', to ensure the design of a scheme has considered the standard.

Density

74 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 45 to 260 units) per hectare on a site such as this with a PTAL of 4, although the London Plan notes that these ranges should not be applied mechanistically. GLA officers calculate the density to be approximately 128 units per hectare across the entire site; however, taking the residential site in isolation, it is clearly a very high density proposal. For such a density to be acceptable, the proposals will need to provide a high quality living environment for occupiers, including adequate provision of amenity and play space, an appropriate level of affordable housing, an appropriate mix of unit sizes, high quality design and resolution of all transport and climate change issues. As detailed in this report, some of these issues require further clarification for such a density to be acceptable.

Residential quality

75 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Housing SPG. As stated above, the Mayor has published draft Minor Alterations to the London Plan, which have been prepared to bring the London Plan into line with new national housing standards and car parking policy (with an Examination in Public held 21-22 October 2015. A draft Interim Housing SPG and Housing Standards Policy Transition Statement has also been published reflecting these and other changes.

76 Detailed comments on the proposed scheme in relation to residential quality are included under 'urban design and tall buildings' below.

Children's play space

77 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG, which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

78 The Design Code submitted in support of the outline planning application identifies that the provision of play space will be in line with the SPG, which is acceptable.

Historic Environment

Designated heritage assets

79 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The proposal will have an impact on designated heritage assets in terms of the Grade II Listed Warmington House (744 High Road), the 'Northern Terrace' including the Grade II listed 794, and 798 – 802 High Road, Grade II* 796 High Road 'Percy House', all within the site; Dial House (Grade II* listed), located at 790 High Road, 792 High Road (Grade II), 797 and 799 High Road (Grade II), 7 White Hart Lane (Grade II), and 707 High Road fronting onto Church Road (Grade II), all outside the application site; and the North Tottenham Conservation Area, which runs along the High Road and part of which is within the site. Other designated

heritage assets lie further away to the north and south along the High Road, and to the west, including listed buildings, as well as the Scotland Green Conservation Area, the Bruce Grove Conservation Area, the Tottenham Cemetery Conservation Area, and the Tottenham Green Conservation Area. The applicant has provided a comprehensive Heritage Statement by Donald Insall Associates (Sept 2015), which provides a detailed analysis of all designated and non-designated assets, including a verified views assessment.

80 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

81 The NPPF states that when considering the impact of a proposal on the *significance* of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

Significance of designated heritage assets

82 The applicant's Heritage Statement includes an analysis of the significance of the North Tottenham Conservation Area. It attaches 'high significance' to Tottenham Hotspur Football Club (historic, cultural, communal); the High Road and White Hart Lane (historic); the remaining eighteenth century buildings (architectural and historic), including those in the Northern Terrace, most of which are statutorily listed of national importance, with the Grade II* listed buildings being of 'more than special interest'; and the listed early nineteenth century buildings (architectural and historic), including Warmington House. The Heritage Statement attaches 'significance' to the unlisted Victorian and Edwardian buildings in the area (architectural, historic, cultural, communal), including 746 High Road 'Edmonton Dispensary', 748 High Road 'The Red House', and 750 High Road 'White Hart Public House', all locally listed and within the application site; buildings with cultural value (historic, cultural, communal), including a number of schools, churches, public houses, and other community buildings; and the green (historic, cultural, communal) fronting the Sports Centre and 705-707 High Road, to the south-west of the site. Post war buildings and historic buildings that have been altered are identified as of 'low significance'.

83 The Grade II listed Warmington House is identified as having architectural and historic significance. The listing description identifies the building as of special architectural interest as a house of 1828 retaining its internal plan form, staircases, and a number of original features; and of historic interest as an important survival of the once-numerous Georgian houses that lined the High Road, one of the principal historic corridors into the capital. However the building is currently vacant, boarded up, in poor repair, and included on Historic England's Heritage at Risk

Register. The buildings on either side have been demolished, leaving a scar in the front elevation and negatively impacting its setting. The building has also lost much of its architectural detailing on the front elevation. To the rear of the building is a car park and the existing Stadium, which is prominent in views from the High Road. The low rise utilitarian Spurs Shop to the south of the building further detracts from its setting. The three locally listed buildings to the north form part of the setting of the building, although two of these are vacant and boarded up.

84 The Northern Terrace includes a number of Grade II listed buildings, and three Grade II* listed buildings (late-seventeenth to mid-eighteenth century), which are therefore of 'more than special interest'. All are identified as having high architectural and historic significance and are mostly in use, some in a slightly neglected state.

85 The Heritage Statement also analyses the significance of the other High Road Conservation Areas, including Scotland Green, Bruce Grove and Tottenham Green, attaching 'high significance' to the eighteenth century buildings (architectural and historic), statutorily listed early nineteenth century buildings (architectural and historic), and Tottenham Green (historic, cultural, communal); and 'significance' to unlisted Victorian and Edwardian buildings.

86 The Bruce Castle, Tottenham Cemetery, and Alexandra Palace Conservation Areas are also identified as containing areas of public realm of 'high significance', including Bruce Castle Park, Tottenham Cemetery, the green fronting the Edmansons Close Almhouses, and Alexandra Park.

87 Haringey Council's Tottenham High Road Corridor Conservation Area Appraisal (adopted 2009) covers all of the High Road Conservation Areas, and the North Tottenham Conservation Area has an appraisal in place for the Townscape Heritage Initiative sub-area (adopted 2014), which includes the west side of the High Road opposite the application site, as well as the Northern Terrace. These assessments generally support the applicant's Heritage Statement assessment of significance, and GLA officers concur with the assessments.

Non-designated heritage assets

88 London Plan Policy 7.8 also applies to non-designated heritage assets. Within the site, 746 High Road, the 'Dispensary'; 748 High Road, the 'Red House'; and 750 High Road 'White Hart Public House' are all locally listed, which are therefore classified as non-designated assets. There are a large number of other locally listed buildings within the North Tottenham High Road and other nearby Conservation Areas, as listed in Appendix 8.1 of the application materials. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a 'balanced judgement' is required having regard to the scale of any harm or loss and the significance of the heritage asset.

Significance of non-designated heritage assets

89 The 'Dispensary' (c. 1906) is a locally listed building making a positive contribution to the Conservation Area, although it is currently vacant with the windows boarded. The historic significance of the building lies in its original use as a dispensary and its connection to an aspect of the early development of healthcare. Architectural significance is derived from the principal red brick and Portland stone facade to the High Road and the ground-floor shopfront has particular merit. The rear extension and the southern return elevation, recently exposed by the demolition of 744A High Road as part of the consented scheme, detracts in views north along

the High Road. Some original interior fixtures and fittings remain, associated with the dispensary use, particularly at ground floor level.

90 The 'Red House' (c. 1880) is a locally listed building that makes a positive contribution to the North Tottenham Conservation Area. The applicants' Heritage Statement identifies that the historical significance of the building is in its origins as a coffee house and association with the late-nineteenth-century temperance movement, which sought to provide an alternative to the public house as a meeting point for the working classes. Historic and communal value derives from its association with Tottenham Hotspur Football Club from 1922 and in particular for its use as the office of Bill Nicholson OBE (1919-2004), the football player, coach and manager of Tottenham Hotspur. The building is a handsome red brick Victorian structure with steeply pitched roofs. Although the original ground floor coffee house frontage has been replaced, the building maintains a distinct architectural character and although not original, the oriel window adds to that character. The first-floor front room has some historic significance in retained fixtures and fittings that could date from the original use of the building, and historic and communal significance from its use as the office of Bill Nicholson.

91 The former 'White Hart Public House' (c. 1890s) is a locally listed building that makes a positive contribution to the North Tottenham Conservation Area. The applicants' Heritage Statement identifies that the historical significance of the building lies in its construction as an 'improved' public house in response to the growth of the Stadium. The building is typical of the late-Victorian/early-Edwardian period and has a distinct architectural quality that remains largely intact on the exterior, although the interior has been much altered. The building was designed as part of a terrace stretching to the north, demolished as part of the consented scheme, and the exposed northern return elevation of the building detracts from the character of the Conservation Area.

92 The setting of all three buildings is poor, with a car park and the existing Stadium to the rear, which is prominent in views from the High Road.

93 Other non-designated heritage assets, chiefly in the form of locally listed buildings within the North Tottenham Conservation Area and other Conservation Areas are considered in the Heritage Statement in terms of their significance as part of those designated assets.

94 As stated above, Haringey's Conservation Area Appraisals generally support the applicant's Heritage Statement assessment of significance, including non-designated heritage assets.

Impact on heritage assets (designated and non-designated)

95 The proposals involve the demolition of the locally listed buildings at 746 High Road, the 'Dispensary'; 748 High Road, the 'Red House'; and 750 High Road, the former 'White Hart Public House'. This clearly involves the total loss of non-designated heritage assets identified as 'significant' within the North Tottenham Conservation Area by the applicant's Heritage Statement. Taking account of the scale of the loss and the significance of the heritage assets, GLA officers therefore conclude that the proposals will cause 'substantial harm' to the significance of the Conservation Area. According to the NPPF, in these cases, local planning authorities should refuse consent unless it can be demonstrated that this is necessary to achieve substantial public benefits that outweigh the harm. It should also be noted that the Barnwell Manor and Forge Field judgements made clear the strong presumption against granting permission that would cause harm to a Conservation Area, and that a planning authority can only strike the balance between harm and planning benefits if it demonstrably applies that presumption.

96 The applicant justifies these demolitions on grounds of crowd safety, caused by the narrowness of the footway in front of these buildings, which narrows to 2.2 metres (as measured by the Council's independent adviser) and cannot safely accommodate the large match day crowds that travel both north and south along the footway. On match/event days, this pinch point forces pedestrians to walk into the adjoining southbound bus lane during the pre-match period, which is expected to be significantly exacerbated by the increase in the Stadium capacity from 36,000 to 61,000. The previously consented scheme sought to address this by the creation of a new pedestrian walkway (known as the 'canyon') that would funnel pedestrians from the High Road to the rear of the retained buildings and back on to the High Road. This solution allowed the retention of the three locally listed buildings (along with the Grade II listed Warmington House), although GLA officers recognise that this resulted in a rather unsatisfactory arrangement of individual buildings isolated in public space. However, subsequent advice from the applicants' pedestrian movement experts, Movement Strategies, concluded that the vast majority of pedestrians on match/event days would not follow the proposed new pedestrian route/'canyon' and would instead use the quickest and most direct route in front of the retained buildings along the High Road pavement, with spectators regularly moving into the adjacent carriageway bus lane.

97 In response, the applicant explored solutions that would allow the buildings to be retained, including increasing stewarding and policing, and the installation of barriers, to more radical solutions such as temporary and permanent closures of the highway, and the creation of underpasses and flyovers, as set out in the applicants' Crowd Safety Options Appraisal Report. This demonstrates that the only alternative options for retaining the locally listed buildings that are likely to address the requirements for crowd safety are unacceptable in traffic and highways terms and incapable of being delivered. The Report also found that in addition to the significant risks to public safety, the level of overcrowding in this identified pinch point would call into question the ability to secure viable commercial uses for the buildings. Consequently, the current application proposes to remove the three locally listed buildings to create a wider footway of 9.5 metres between the carriageway of the High Road and the proposed Tottenham Experience building. The proposed footway width is considered by the applicant to be sufficient to satisfactorily address the crowd flow issues in this part of the development.

98 GLA officers note that the analysis and conclusions of the Crowd Safety Options Appraisal Report has been confirmed by the Council's independent expert advice. The increased width of the footway could in itself be considered a substantial public benefit, which could outweigh the loss of these buildings (as required by the NPPF), since it resolves public safety concerns. It is also acknowledged that the loss of these buildings may be necessary to deliver the entire proposal, which achieves other substantial public benefits, including new sporting and recreational facilities for public use, a community health centre, the restoration and re-use of the Grade II listed Warmington House, a new museum, 585 new high-quality homes, a new world class Stadium, and the extensive economic and regenerative benefits to the area as discussed under 'Principle of development' above.

99 In coming to a conclusion on the acceptability of the loss of these buildings, GLA officers are required to take account of the strong presumption against granting permission that would harm the character or appearance of a conservation area. The applicants' intention for artefacts and elements of the buildings to be relocated and re-used in the proposed Tottenham Experience Museum is strongly supported; however, taking account of the significance of these buildings as discussed above, GLA officers consider the facade of the 'Dispensary' to be of particular merit, and the applicant should consider the relocation of the entire frontage within the new Tottenham Experience terrace, adjacent to the retained Warmington House. The form of the Dispensary building should allow relocation, unlike the other two buildings, which due to

their corner treatment and gable fronted facades, could not be satisfactorily retained and relocated. This would also benefit the setting of the retained listed building, which would otherwise appear rather isolated in a highly contemporary terrace. Bill Nicholson's former panelled office from the 'Red House' is also considered to be of significance and the applicant should consider its full relocation within the new Museum. The applicant should provide further information on the relocation of these two elements, which would be considered to reduce the harm to an acceptable level in relation to the public benefits provided.

100 Concerning the Grade II listed Warmington House, the building, its interior plan, and features such as the staircase and fireplaces will be retained, with works to its interior and exterior to remove detracting later additions, which GLA officers consider will enhance rather than harm the significance of the listed building and the Conservation Area. Whilst the building was originally built as a detached house, its setting has been much altered over time and the development of the Tottenham Experience building will integrate Warmington House within a contemporary terrace of a similar scale and massing. It is however considered to be important that Warmington House is still able to be read as being detached from the main terrace and that there should be a clearly readable break between the new terrace and the flanks of Warmington House. This has been achieved by introducing glazed infills to the flanks of the building. GLA officers consider that the terrace, whilst differing from the original setting of Warmington House, responds appropriately in terms of scale and massing, preserving and enhancing the listed building and its setting, although as discussed above, the inclusion of the facade of the 'Dispensary' in this terrace would improve its setting. It is recognised that the proposed 22 storey glass-clad hotel tower and the new Stadium will rise up behind the building; however this is not considered to harm the significance of the building or its setting compared to the existing poor situation. The proposed Stadium is in the same location and of similar scale and massing as the previously consented Stadium, which has already been deemed acceptable with regard to its impact on Warmington House, as well as the 'Northern Terrace' including the Grade II listed 794, and 798 – 802 High Road, Grade II * 796 High Road 'Percy House', Dial House (Grade II* listed), located at 790 High Road, and the adjacent property at 792 High Road (Grade II).

101 It is recognised that the majority of the High Road frontage of the site, north of Bill Nicholson Way, has been cleared and is vacant, revealing the utilitarian and incoherent massing of the existing Stadium. It is noted that a Grade II listed building and locally listed buildings that previously occupied this part of the site were demolished under the previous permission. The current situation clearly detracts from the setting of the Conservation Area and statutorily and locally listed buildings. GLA officers consider that the introduction of built form in this area would be beneficial to the Conservation Area, and it is recognised that the scale and massing of the proposed Stadium is similar to, if slightly greater than, that approved under the previous permission.

102 The proposals will also impact on heritage assets further away from the site, including those within the North Tottenham Conservation Area, the Scotland Green Conservation Area, the Bruce Grove Conservation Area, the Tottenham Cemetery Conservation Area, and the Tottenham Green Conservation Area, including statutorily and locally listed buildings. The applicant has provided a series of photographs, visual representations, and wirelines to illustrate this impact, and an analysis of these impacts is included in the Heritage Statement. The Statement assesses the impact of the proposals on the wider North Tottenham High Road Conservation Area as being entirely positive; however GLA officers consider that the proposals will cause some harm, for example to View 27, where the Stadium will rise up significantly behind the northern terrace, containing Grade II, II* and locally listed buildings, and to a somewhat greater degree than the consented Stadium. However, the harm caused to the significance of the Conservation Area and the setting of the statutorily and locally listed buildings is considered to be 'less than substantial' and outweighed by the very significant

public benefits discussed above. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and have placed considerable importance and weight to the harm caused to the setting of the listed buildings.

103 GLA officers also consider that some harm will be caused to the significance of the North Tottenham Conservation Area, as demonstrated by Views 31, 32, and 33, although the harm is considered to be 'less than substantial', and outweighed by the very significant public benefits discussed above. In coming to this conclusion, GLA officers have again taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area.

104 The Heritage Statement finds that some harm will be caused to the significance of the Bruce Castle Conservation Area (View 11), Scotland Green Conservation Area (View 36), and Bruce Grove Conservation Area (View 37). GLA officers agree with this assessment and consider that the harm is 'less than substantial' and outweighed by the very significant public benefits discussed above. Although the proposed taller buildings would be visible in longer views from the Alexandra Palace and Tottenham Cemetery Conservation Areas, GLA officers do not consider that this would result in harm to their significance, due to the intervening distance and shielding from existing urban form and trees. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area.

105 The proposals will not affect any strategic views as identified in the Mayor's London View Management Framework SPG.

Urban Design and tall buildings

106 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which address both general design principles and specific design issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design polices in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

107 The intention to introduce new public routes across this large and currently impermeable site is strongly supported. This will be implemented through the podium level routes passing from the High Road to Worcester Avenue and Park Lane, both to the north and south of the proposed Stadium. The route to the south passes through the new 'South Podium Square', forming a 'green way route' linking Northumberland Park Station to White Hart Lane Station. These routes are lined almost exclusively with uses associated with the Stadium, chiefly access and circulation space. The South Podium Square has some adjacent cafe and restaurant space located in the hotel and Extreme Sports building; and flexible uses with the overlooking residential towers above, although this element is part of the outline application and expected to be constructed later. The relatively limited surrounding and overlooking uses, together with access to these routes via stairs/lifts raises some concerns about the level of active use and overlooking of these routes and spaces outside of match and event times. This also raises potential safety and anti-social behaviour concerns, particularly at night. The applicant should provide further information on how these spaces will be managed in order to counter these concerns.

108 The South Podium Square is described as the size of Trafalgar Square and includes a series of 'islands' around the ventilation shafts to the car parking areas, which provide seating, trees and planting; a 'jumping jet' water fountain; a multi-use games area (MUGA); and seating areas for the surrounding café and restaurant uses. The north, east and west sides of the Square allow free spectator access to the Stadium. The proposals to include multiple uses and fountains, to enliven this large space, are supported. The designs indicate that the public realm will be of a high quality.

109 A new ground level 'Plaza' is proposed on the south-west corner of the site, at the junction of the High Road and Park Lane, providing a new gateway to the Stadium. The form of the 'Tottenham Experience' building appropriately delineates the space, also aligning with the High Road, while allowing large event day crowds to pass towards the Stadium. One of the entrances from the High Road to the basement car park and servicing area is through the Tottenham Experience building at ground level. This will require careful detailed design in order to ensure that the entrance is integrated into the building fabric, while being clearly legible to help orientation and avoid interference with crowd movement on match and event days. The proposed use of a large expanse of glass cladding on the south-facing 'prow' of the building may not be the best response to large event day crowds and should be reconsidered. The proposed rooftop cafe in this location also raises some safety concerns. The ground floor of the neighbouring proposed hotel extends in a V-shaped projection into the Plaza public space, acting as a barrier to circulation around the building, blocking views of the podium access stairs and lift to the east of the hotel, and serves to split the Plaza into two separate spaces. The applicant should reconsider this layout or provide further justification.

110 The majority of Worcester Avenue, beyond the existing houses to the north, is currently of very poor quality, lined with inactive uses. On the west side, within the site, is the existing Stadium East Stand, with blank frontages other than on match days, and hoarding further north. Much of the east side of the road is lined by blank walls associated with the neighbouring schools. The proposals seek to activate the southern end of Worcester Avenue, including residential access to Tower A and commercial access to the proposed ground floor flexible use space. This is secured within the Design Parameters for the residential part of the outline application. To the north of this is the Stadium, with the corporate hospitality entrance and some management office uses; and the Community Health building, with servicing access, circulation and servicing at ground floor level. It is accepted that these spaces are required for Stadium access and circulation and consequently, active uses outside of event days will be relatively limited, although some activity will be provided by the ground floor foyer for the Community Health building. The proposals to introduce tree planting and other landscaping to create shared space on Worcester Avenue is strongly supported in order to improve its quality, with pedestrian zones delineated from vehicular/servicing routes through the positioning of trees and street furniture, which ensures a safe and fully inclusive environment. The applicant should clarify the landscape design/uses at the south end of Worcester Avenue, which are not clearly detailed in the application materials.

111 The residential component of the proposal is submitted in outline with full details of layout, scale and access; and matters relating to appearance and landscape reserved for approval at a later stage. The application is submitted with a Design Code and Parameters relating to the residential and Extreme Sports components, which establish a series of design parameters that any subsequent reserved matters application will need to comply with. This includes a commitment to a maximum of eight units per core, no single aspect north facing units, and minimum floor to ceiling heights of 2.5 metres, with 2.6 metres preferable at lower levels.

112 The introduction of duplex or triplex maisonettes on Park Lane, with defensible space in the form of small front gardens is welcomed, as this will help to relate the larger scale of the residential buildings with the adjacent low rise housing. It is accepted that the introduction of two residential towers of up to nineteen above-ground storeys on Park Lane presents a contrast in scale to the two storey housing to the south; however this is considered to be an improvement on the present situation, where the south stand of the existing Stadium extends out above the highway at upper levels and presents a continuous line of blank frontage to the street. The proposals will considerably widen the footway, introduce tree planting, and open up views between the residential towers. The taller residential buildings are appropriately located further north, closer to the Stadium, with lesser impact on the surrounding context. The Design Code and Parameters are considered to be rigorous enough to ensure a high residential quality and are welcomed.

113 The Design Code and Parameters also secure the maximum height of each of the residential and Extreme Sports buildings. Although CABE/EH Guidance on Tall Buildings (2007) calls for tall buildings to be submitted in full application form, in this case the Design Code and Parameters are considered to be sufficiently rigorous to ensure a high quality development. The Council should ensure that any permission secures compliance with the Design Code and Parameters. Retention of the residential scheme architect is strongly encouraged.

114 The communal amenity space provided on top of the residential plinth is submitted in outline form, as it will need to respond to the final design of each of the residential blocks. The Design Code and Parameters establish appropriate design principles to inform the future consideration of this space.

115 The glass-clad curtain walled hotel building is somewhat at odds with the immediate context of the High Road Conservation Area, although this helps to visually distinguish the building as commercial, and relates well to the more contemporary materials of the Stadium cladding. The 22 storey 'blade' shaped massing provides an interesting visual contrast to the rounded massing of the lower-rise Stadium.

116 The cladding of the Stadium is primarily a light coloured metallic mesh wrap, with glazed curtain walling to the south stand. Detailed design should ensure that the cladding retains its simplicity and light colouring, respecting its historic context. This is particularly important in the historic High Road context, where the projecting glazed escalator box on the western elevation has the potential to enliven the facade; however detailed design should ensure an elegant response that allows easy maintenance in order to maintain a high quality appearance.

Inclusive design

117 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

118 The applicants' access statement includes a full assessment of the approach to inclusive access for each element of the full and outline application. A full analysis is provided for the housing standards contained in the draft Interim Housing SPG, which demonstrates that the residential element will meet all of the relevant standards. An analysis of Lifetime Homes standards is also included, which demonstrates compliance, other than those to be addressed during details design. Access standards are suitably secured in the Parameter Plans.

119 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The podium level public spaces are accessed by stairways and

are generally accompanied by lift access; however no lifts are included within the south-west corner of the site, adjacent to the Tottenham Experience and ticketing facilities. Access to the podium level and the Stadium is only available via two banks of stairs and an additional general access lift should be included in this location. As discussed above, the nearest lift access is hidden by the V-shaped projection of the hotel. Further lift access should be incorporated in this location.

Transport

120 TfL has held pre application discussions with the applicant on the non-event day elements of their proposals, as well as recently issuing detailed feedback on the wider proposed development.

Major events – football matches, NFL and concerts

121 The applicant has used weekday match day survey data recorded in May 2014 to inform the trip generation for match days. The use of up to date data is welcomed; however the applicant should clarify how their mode split has been derived. In addition, a weekend modal split should also be provided. The applicant should also confirm how many operational trips (staff etc.) will be generated and how they will travel. Furthermore, the applicant should always provide the absolute trip numbers associated with any modal split so assumptions can be avoided.

122 It has been assumed that approximately 60% of spectators will spend at least 45 minutes or more in the local area before kick-off for a week evening match, which is not considered realistic. Post-game, the applicant should clarify the dwell time for spectators after the match and justify how this will be achieved.

123 A pre- and post-match entertainment programme has been submitted; however this relates to a 15:00 weekend kick-off only, for which no dwell times have been provided. Encouraging a smoother arrival and departure profile is an important element in reducing queues at public transport hubs and therefore weekend dwell times, the proposed entertainment programme for a weekly game, and the spectator departure profile following a home match loss, should all be provided.

124 Two National Football League (NFL) games per season will be hosted and have been assumed to take place on a Sunday. The applicant should provide the data used to inform the trip assumptions.

125 The applicant has assessed the impact of both a 45,000 and 55,000 capacity concert. These are assumed to take place on a Saturday evening. The applicant should clarify how the arrival and departure profile has been derived and provide the data used to inform the trip assumptions.

126 The site is well served by bus routes and it is accepted that there will not be an impact on the capacity of the local bus network. Nevertheless, more discussion is required with the applicant regarding the potential relocation of local bus stops and future bus diversions.

127 Approximately 3% of spectators will use walking as their main mode to and from the stadium. As stated above, an assessment has been undertaken to assess local footway capacity, which has identified particular concern with pinch points along the High Road which can disperse pedestrians into the adjoining southbound carriageway bus lane creating a potential safety issue. On that basis, the applicant proposes to widen the footway on the High Road,

which is not objected to in principle; however as the High Road is part of the SRN and a key bus corridor, any highway amendments will need to be agreed with TfL and the impact on bus and traffic performance understood. The applicant should also confirm how the other deficiencies will be remedied as part of the package of necessary mitigation identified in their assessment required in accordance with London Plan Policy 6.10 'Walking'.

128 A car mode split of 23% has been assumed for home spectators and 10% for away spectators. This is consistent with the 2010 scheme and represents a significant reduction from the stadium mode split of 45.6% last recorded in 2014. The predicted car mode share for both NFL and concerts is notably lower.

129 The applicant has identified a local parking capacity of 5,725 spaces; however it should clarify whether this capacity is based on the maximum distance a car user would be willing to walk to the Stadium once parked. Furthermore, the increase of car parking from 319 spaces proposed in 2010 to 822 currently proposed on site should be justified.

130 As with the 2010 scheme, no highway impact assessment of major event day traffic has been undertaken on the assumption that the level of vehicular use is capped as existing and this is accepted.

131 Total coach demand for a match day is expected to be less than 30 coaches per game mainly associated with away spectators, which the applicant expects to be accommodated within the nearby industrial area. The applicant should assess the coach numbers for both the NFL games and concerts as it is expected that their demand will be greater. Overspill parking will be accommodated on Pretoria Road; however details of the management of this should be clarified.

132 The proposed taxi rank on Park Lane is supported; however the applicant should provide additional detail on its capacity and operation. Provision will also need to be made for private hire vehicles. More discussion with TfL is required on this matter, including the extent of taxi queue marshalling required.

133 In accordance with London Plan Policy 6.9 'Cycling', the applicant should review the proposed design of Park Lane in order to provide similar levels of service for cycling as that provided by the nearest section of Cycle Superhighway 1 on Church Road. Furthermore, to help identify issues of severance and cycle safety, a study of the 'cycling level of service' (CLoS) of the existing streets within the vicinity of the site is requested.

134 The applicant has over-estimated the future rail capacity on London Overground services but has still identified capacity constraints during peak hour rail services (including Abellio Greater Anglia services) and at the weekend on London Overground services. In addition, all local stations will experience post-match queues. This element of their assessment should therefore be amended with the correct capacity figures and using a robust arrival and departure profile. TfL is nevertheless concerned with the impact of queues outside rail stations when the effect of additional passengers interchanging at Tottenham Hale and Seven Sisters is taken into account. On that basis, more discussion is required with the applicant on their technical assessment to ensure that the impact of additional passengers is fully understood.

135 Based on the assessment undertaken to date, TfL understands that demand at Tottenham Hale station in the mid-week pre-match period could be 7,788 spectators, an increase from the 1,314 spectators observed in 2008. The applicant's assessment notes that proposed upgrades at Tottenham Hale station will deliver additional ticket hall and gate line capacity, with vertical capacity remaining a constraint at peak periods, exacerbated by match day demand. In order to mitigate the impact of this additional demand, minimise the impact of

queuing, and support the applicant's proposed mode shift to public transport, it is recommended that additional escalator capacity is provided at one of the Victoria Line stations. As with the 2010 scheme, the applicant predicts that additional demand for Underground services should be encouraged at Tottenham Hale. This is considered reasonable given the planned and recent upgrades at this interchange and the existing capacity constraints at Seven Sisters station. In the case of either station, the expected cost of an additional escalator would be £3.6 million, but if delivered with the planned Tottenham Hale station upgrade this would reduce to £3 million. In accordance with London Plan Policies 6.1 'Strategic Approach' and 6.2 'Providing Public Transport Capacity', TfL would welcome further discussions with the applicant concerning a contribution to help deliver these works.

136 Two shuttle bus services will be operated, the first tailored towards premium ticket holders and serving Tottenham Hale, and the second available to all and routed to Alexandra Palace via Wood Green. The principle of this is supported; however more information on its operation is required in order to fully understand the potential of this service to address match day demand.

137 No cycle parking is proposed for the Stadium as provision already exists at Lilywhite House. The quantum of spaces and distance for Stadium employees needs to be clarified before this can be considered acceptable. As there are no specific London Plan cycle parking standards for a Stadium, the applicant could consider a cinema as a place of assembly to be comparable. This land use has a requirement of one space per 50 seats, which would correspond to 1,120 spaces. This would cater for the 1% cycling mode share predicted and any potential future increase. More discussion on this matter should be undertaken with TfL.

138 The applicant should provide details of the delivery and servicing requirements of a major event and demonstrate how this will be accommodated on site.

139 It is understood that the Travel Plans associated with the consented development will be updated and new ones added for the different aspects of development. These will need to be provided to TfL for assessment prior to the consent of any planning permission. The applicant should also confirm that other match day controls secured with the previous consent will be updated including match day CPZs and the Local Area Management Plan (LAMP).

Non-event day impacts – residential, hotel, serviced apartments etc.

140 It is accepted that observed traffic flows along the High Road are lower than assumed in the 2010 assessment; however it is noted that the Sainsbury's store has yet to trade to its full potential. As the area is regenerated, trips would be expected to increase and therefore the baseline should reflect the original 2010 vehicular trips associated with the retail element.

141 The applicant should provide a full multi-modal split for all land uses proposed, which includes all day trips, weekday and weekends. The number of trips interchanging onto the Victoria Line at both Tottenham Hale and Seven Sisters also needs to be assessed.

142 For residential uses, the applicant has used comparator sites associated with enabling residential development associated with the Emirates Stadium; however the trip generation assumptions are considered to have underestimated car trips. It is recommended that validated TRICS and ward census data is used.

143 It is considered that trips associated with the Tottenham Experience and non-event day attractions have been underestimated, and more justification should be provided on how the trip numbers were derived.

144 For the flexible community/office use, an impact assessment that considers the highest trip generating potential occupier is required.

145 For the health centre, hotel, and serviced apartments, the trip generation data is not considered to be reflective of the local area and the survey sites used are too dated. On that basis, new surveys should be identified and a manual adjustment of trips may be required to ensure it is robust. In addition, the assessment should include coach and taxi trips.

146 The baseline traffic flows should include the northern development trip generation as originally predicted. The all-day flows should also be provided to allow TfL to validate the peak trip numbers. Furthermore, as stated above, it is considered that vehicular trip generation could have been underestimated.

147 There is a discrepancy in the submission material on the number of car parking spaces provided for residential uses and this should be clarified; however TfL would consider a parking ratio of 0.47 spaces per unit (a total of 275 spaces) to be broadly consistent with London Plan Policy 6.13 'Parking'. A further reduction would be supported. The applicant should demonstrate how the proposals could accommodate the London Plan Housing SPG requirement of one Blue Badge space per wheelchair accessible unit. Nevertheless, it is welcomed that electrical vehicle charging points (EVCPs) will be forthcoming in line with London Plan minimum standards.

148 The 53 car parking spaces proposed for the hotel will need to be justified, as the London Plan requires hotel parking for areas with a good PTAL to be limited to operational needs only.

149 In total, 56 on-street pay and display parking bays are proposed on Worcester Avenue. A parking accumulation survey is required to ensure that these spaces are appropriate.

150 As with the Stadium, no cycle parking is proposed for the Tottenham Experience as provision already exists at Tottenham Football Club's offices to the north of the site. The quantum of spaces and distance from potential places of work needs to be clarified before this is considered acceptable.

151 For the hotel, the applicant proposes 12 spaces at basement level, which is assumed to be staff parking. To improve accessibility, these should be located closer to the core. Short stay visitor spaces will also be required.

152 A total of 12 cycle parking spaces on Worcester Avenue are proposed to serve the health facility; however it is not clear how these will be allocated between short stay and long stay. Any long stay staff spaces should be provided within the building, as this will enhance their security. The standards are based on staff numbers, which therefore needs to be clarified in order to assess the provision against the policy requirements.

153 For the Extreme Sports facilities, 16 cycle parking spaces are proposed on Park Lane; however it is not clear how these will be allocated between short stay and long stay. As stated above, any staff parking should be within the building. Notwithstanding this, the provision is inadequate as the London Plan requires short stay spaces to be provided at 1 space per 100 sq.m., which equates to 21 spaces in this instance. Long stay spaces are based on staff numbers, which therefore needs to be confirmed.

154 In total, 872 cycle parking spaces are provided for the residential units at ground floor level, which falls just short of the London Plan requirement of 882 spaces and should be

increased. The applicant should demonstrate that their access is consistent with the London Cycle Design Standards.

155 The applicant should demonstrate that space is available to accommodate the maximum provision of cycle parking spaces required for the range of land uses that could occupy the flexible floorspace. A condition is sought to require the delivery of the appropriate number of cycle spaces required upon occupation.

156 All staff employed on site should be provided with access to shower and changing facilities. Due to its size, these facilities should be provided across the whole site and close to cycle parking to ensure that they are convenient. Short stay spaces are required for all land uses and should be provided within close proximity of the venue.

157 Taxi and PHV demand should be provided to TfL, which will confirm the acceptability of the proposed taxi rank on Park Lane.

158 The applicant should assess coach demand; however on non-event days, space will be available within the hotel for coach parking, the capacity of which needs to be confirmed.

159 The applicant should provide details of the freight requirements of each land use and demonstrate how this will be accommodated on site.

160 The proposed construction compound would mean that expected construction vehicles would only increase by 3% from the 2010 application; however an increase of 33% would be expected without this in place. Given the scale of the development, a framework Construction and Logistic Plan (CLP) should be provided.

161 It is understood that the Travel Plans associated with the consented development will be updated and new ones added for the different aspects of development. These should be provided to TfL for assessment prior to the consent of any planning permission.

Community Infrastructure Levy

162 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in Haringey. Haringey Council also commenced CIL charging in November 2014.

Climate Change

Energy

163 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

164 The demand for cooling will be minimised through solar shading and solar control glazing, including low g-values for areas without shading that are at risk from high gains.

165 BRUKL sheets have been provided for the detailed elements of the application, which show the building performance against the Part L solar gain checks. The BRUKL documents show that a number of spaces will exceed the solar gain limits. The applicant has stated that these are circulation spaces and are exempt from Building Regulation compliance checks. The applicant should provide further evidence to demonstrate that the cooling demand has been reduced in line with Policy 5.9 'Overheating and Cooling'. Dynamic thermal modelling following TM52 and TM49 guidance is recommended.

166 No modelling has been undertaken for the outline application due to the limited detail available at this stage. However, the applicant has stated that passive measures will have been incorporated in the design considerations and will continue to be coordinated during design development in order to minimise overheating risk and excessive cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 should be undertaken at the reserved matters stage. The applicant should particularly consider how best to mitigate any restrictions posed by match day and event noise, local air quality issues, ground floor single storey apartments and single aspect units.

167 The development is estimated to achieve a reduction of 220 tonnes per annum (5%) in regulated CO2 emissions under the first stage of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development. Sample SAP calculation worksheets (both DER and TER sheets), including efficiency measures alone should be provided to support the savings claimed.

168 The site is located within a district heating opportunity area and has been subject to a number of heat mapping studies investigating the potential for an area wide heat network. The site is located within a key development area for a district heating network and Haringey Council has identified the site as a possible location for the Haringey heat network energy centre.

169 It is understood the applicant has been involved in ongoing discussions with the Council regarding the potential provision of an oversized energy centre on the site, which would provide heat to surrounding sites. It is also understood that the applicant is unwilling to provide this energy centre infrastructure on the site due to design and access concerns, with the taller building, most suitable to allow flue gas dispersion, being located away from the road frontage. Notwithstanding this, given the scale and key location of the development, the applicant is strongly encouraged to continue to investigate the feasibility of including additional space within the energy centre, to help facilitate the development of the Haringey heat network. The applicant should commit to continue to work with the Council to support the delivery of the Haringey heat network and provide evidence of correspondence with the Council regarding this matter.

170 The applicant is proposing a heat network supplying the Phase 1 elements (Stadium, the Tottenham Experience and the Community Health building), with provision made for connection to the Haringey network. Phase 2 elements of the application (Hotel, Extreme Sports buildings and residential towers) will be connected to the Haringey heat network; however, it is not clear how the Phase 2 elements will link into the site wide heat network, for instance, whether the Stadium plant room will serve the Phase 2 buildings or whether there will be additional plant rooms. The applicant has stated that the details of the site wide layout and connection of the Phase 2 elements will be developed with Haringey Council; however this approach is not accepted as the applicant is required to demonstrate how the site wide network has been designed to allow for connection to the Haringey heat network, including the connection point. Further information is required to clarify this point.

171 For the development to be fully future proofed for connection to the Haringey heat network, the development should be served by a site wide heat network from a single energy centre, with a single connection point. The applicant should therefore confirm that all apartments and non-domestic building uses will be connected to the site heat network to be served by a single energy centre. A drawing showing the route of the heat network linking all buildings on the site should be provided. The applicant should provide further information on the interim heating solution, including clarification of the number of plant rooms and how they will be decommissioned. A proposed approach that results in multiple gas boilers providing heat to each iterative stage of the development is unlikely to be supported as it would prove costly to retrofit to either connection to the Haringey heat network (if available) or a single site-wide CHP powered network.

172 The applicant has identified an area for a potential site wide energy centre within the basement of the residential towers development, should connection to the Haringey heat network not be possible. The applicant has stated that further details of the energy centre design will be developed if the preferred strategy of connecting into the Haringey heat network is not realised. The applicant should provide information on the site wide energy centre, including size, location and layout in order to demonstrate that a site wide energy centre could be accommodated in the event that connection to the Haringey heat network is not possible. As the applicant has cited access and management concerns around the provision of an oversized district energy centre in this location, it is reasonable to expect these constraints would also apply to a site-wide CHP energy centre. The applicant should detail how these constraints would be overcome, in order to provide sufficient confidence that either a connection to the Haringey heat network or a site-wide CHP is the ultimate energy strategy applied to the site, and that any proposed interim solution does not become permanent if it proves unfeasible to implement an energy centre (oversized district or site-wide CHP) in the residential block.

173 While it is acknowledged the applicant is pursuing connection to the Haringey heat network as its first priority, which is supported, the current approach leaves an unacceptable level of uncertainty as to what the ultimate energy solution will be if the residential site is unable to support an energy centre. Any section 106 agreement that addresses this issue must provide the Council with clear trigger points for assessment and decision, either on connection to the Haringey heat network or implementation of a site-wide CHP network. Further information is required to demonstrate the long-term approach should these options prove unfeasible or unviable.

174 The applicant is proposing to allow connection to the Haringey heat network, which will include gas fired CHP. The applicant has stated that the carbon intensity of the network is not yet known and the applicant has used the carbon intensity factor for a typical heat network taken from the national calculation methodology at 0.15 kgCO2/kWh.

175 Should connection to the Haringey heat network not be possible, then the applicant is proposing to install a 770 kWe /872 kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (62% of the total heat load). The CHP has been sized to provide the same carbon intensity for heat as used for the Haringey district heating scenario. The applicant should provide further information on how the CHP has been sized, including suitable monthly demand profiles for heating, cooling and electrical loads.

176 A reduction in regulated CO2 emissions of 730 tonnes per annum (17%) will be achieved through this second part of the energy hierarchy ('Be Clean').

177 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install roof mounted photovoltaic (PV) panels on the roofs of the residential towers. The applicant should provide an indicative roof layout drawing to demonstrate that there is sufficient capacity to accommodate the proposed PV array.

178 The applicant has stated that the roof area for PV is limited, due to shading on the low rise buildings, and due to the lightweight structure design on the Stadium roof. Whilst it is acknowledged that the low rise buildings may not be appropriate, the large Stadium roof presents a major opportunity to increase energy generated through renewable technology. The applicant should therefore investigate an integrated PV panel solution using lightweight technology such as thin film photovoltaics, in order to maximise on-site savings.

179 A reduction in regulated CO2 emissions of 20 tonnes per annum (0.5%) will be achieved through this third element of the energy hierarchy ('Be Green').

180 The Environmental Statement indicates that the development will incorporate back up diesel generator plant, which is anticipated to operate for 8 hours for 30 days a year (240 hours per annum) on event days, in order to supplement the power required at these times. Including maintenance running this increases to 292 hours per year (maximum). The hotel and residential generator plant are backup emergency power generators and will undergo a maximum of 1 hour of maintenance per week (52 hours per annum). Therefore these generators have been assumed to operate for a worst-case of 52 hours per year. The applicant is requested to provide further information on these generators in order to allow the energy use from the diesel generators to be determined. The applicant should detail the size of the generators, the anticipated energy generated per annum, carbon emissions, where the energy generated will be used, and how this information has been taken account of in the submitted energy statement.

181 Based on the energy strategy submitted a reduction of 970 tonnes of CO2 per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 22%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions. London Plan policy requires on-site measures to be prioritised and the use of off-site measures or cash-in-lieu contributions are only accepted where it is clearly demonstrated that specific targets cannot be fully achieved on-site.

Climate change adaptation

182 The site is located predominantly within Flood Zone 1 with a small portion of the site within Flood Zone 2. The site is also generally free from surface water flooding, although it should be noted that a significant stretch of the A10 Tottenham High Road adjacent to the site is shown to be at risk from surface water flooding. Therefore the application of London Plan Policy 5:13 'Sustainable Drainage' is an important consideration for this application.

183 The Flood Risk Assessment (FRA) and Water Strategy both comment on surface water management for the site; however these documents are inconsistent and neither document is satisfactory in relation to its approach to London Plan Policy 5:13. The Water Strategy approach to sustainable drainage appears to be based on discharging up to 1132l/s (150l/ha/s) from the site; however the FRA states that up to 1260l/s may be discharged, in line with the 2010 proposals. The FRA later states that there will be a design outfall rate of 358l/s; however it is not clear how this relates to the earlier figures of 1132l/s or 1260l/s.

184 The Water Strategy states that rainwater harvesting will not be used as the Stadium pitch specialist will not endorse this, and also that the Stadium urinals will be of a waterless design; however it later states that rainwater harvesting is proposed for the Stadium roof.

185 Neither the Water Strategy nor the FRA reference the contribution to run-off reduction that will be made by green roofs and landscaping, nor to the fact that landscaping could be deliberately designed to maximise water absorption/attenuation properties.

186 Infiltration appears to be dismissed on the basis of underlying soils; however given the size of the site there are likely to be areas with permeable soils and consequently this assumption should be tested with on-site soakage tests.

187 There may be a need for sub-surface attenuation tanks to manage residual surface water flows; however the requirement for these should only be considered after the contribution of more sustainable options has been assessed, and the maximum discharge rate from any such tanks should be clearly stated.

188 The principle of including an element of design for exceedance is welcomed, and the FRA indicates that this will be contained within the Stadium. Discharging residual surface water to the Moselle Brook culvert is preferred to discharge to the Thames Water sewer network.

189 A fresh approach to the drainage regime is required for the application to be considered compliant with London Plan Policy 5:13. This should start from a position to seek to achieve greenfield run-off rates; however if this is not achievable then a reduction of at least 50% on current site run-off rates should be targeted. Given the scale of the proposals this is an important consideration and should be resolved prior to any Stage Two referral to the Mayor.

Air quality

190 The site lies within an Air Quality Management Area (AQMA) and an Air Quality Assessment has been undertaken in line with London Plan Policy 7.14 'Improving Air Quality'. The proposal includes gas-fired boilers and diesel-fired generators.

191 Long term impacts on NO2 will be up to slight adverse (assuming road traffic emissions decrease as predicted) or substantial adverse (assuming no reduction in road traffic emissions). Concentrations will increase at locations where the air quality objective (AQO) is already exceeded. Impact on long term concentrations of PM10 are predicted to be up to moderate adverse, but concentrations are not predicted to exceed the AQO.

192 Short term impacts of the energy plant have been modelled and are predicted not to cause exceedences of the short term AQO but they were not modelled in combination with the impact of road traffic and, in particular, with the impact of actual event day traffic which would be expected to include significant queuing traffic and a high proportion of HDVs (coaches). Road traffic data also shows no change in speed as it uses annual average data.

193 The short term impacts on NO2 and PM10 concentrations should be re-modelled based on around 30 matches per year during the football season, plus 16 events during the summer months, for instance using a real schedule for a previous year, and 5 years of Met data. This re-modelling should be provided to the GLA.

194 The gas boilers will conform to a maximum NOx emission of <40 mg/kWh, which meets the standard required. The compression ignition diesel generators will meet the ULEZ 2015

standards for non-road mobile machinery, EU Stage IIIA. The applicant should confirm that the cleanest possible diesel-fired generators (Stage IV) will be used.

195 Overall, the development is air quality neutral for transport and buildings; however further modelling should be provided as above.

Local planning authority's position

196 Haringey Council's position is not yet known.

Legal considerations

197 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

198 There are no financial considerations at this stage.

Conclusion

199 London Plan policies on regeneration; mixed use; town centre uses; sports and recreation; visitor infrastructure; housing; affordable housing; historic environment and loss of heritage assets; urban design and tall buildings; inclusive design; transport; climate change; and air quality are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Regeneration and economic development**: The proposals are supported in line with London Plan policies on regeneration and economic development.
- **Mixed of uses and town centre uses**: The proposals are acceptable in relation to London Plan policies on mix of uses and town centre uses.
- **Sports and recreation**: The proposed sports and recreation facilities are strongly supported in line with London Plan policies.
- **Visitor infrastructure**: The proposal to include a hotel and serviced apartments within the development is supported.
- **Housing:** Housing provision on this site is supported in principle; however the Council should confirm that this would meet local housing needs. The residential density of the proposals may be acceptable, subject to the resolution of other issues raised in this report.

- **Affordable housing**: No information has been provided on the affordable housing offer at this stage and the applicant is required to demonstrate that the application delivers the maximum reasonable amount of affordable housing. A viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.
- **Historic environment**: Taking account of the scale of the demolition and the significance of the heritage assets, GLA officers therefore conclude that the proposals will cause 'substantial harm' to the significance of the Conservation Area and total loss of locally listed buildings. The substantial public benefits arising from the proposal could outweigh the loss of these buildings; however, taking account of the significance of these buildings, the applicant should consider the relocation of the entire frontage of the 'Dispensary' within the new Tottenham Experience terrace, and the relocation of Bill Nicholson's former panelled office from the 'Red House' within the Museum. Harm to some other heritage assets is considered to be 'less than substantial' and outweighed by the considerable public benefits.
- **Urban design and tall buildings**: The proposals are considered to be of a high design quality and potentially iconic; however the applicant should provide further information on how the podium level public spaces will be managed in order to counter concerns about levels of activity and overlooking. Further consideration should be given to the ground floor layout and design of the Tottenham Experience building and the hotel. The applicant should clarify the landscape design/uses at the south end of Worcester Avenue.
- **Inclusive design**: The approach to inclusive access is generally acceptable; however an additional general access lift should be included from the Plaza to the first floor podium level.
- **Transport**: The applicant will need to work closely with TfL to ensure that the impact assessment is sufficiently robust, as there are concerns that the peak period for trips has potentially been underestimated. More discussion would then follow to identify appropriate mitigation and ensure that the scheme is designed appropriately to cater for the expected uplift in trips. In addition, justification for the quantum of proposed cycle parking, car parking and scheme layout are required.
- **Climate change**: The applicant should provide evidence to demonstrate that the cooling demand has been reduced; sample SAP calculation worksheets; further details on the site wide network and energy centre; further details on the CHP unit; further information on photovoltaic options; and further information on the diesel generators. The applicant is strongly encouraged to continue to investigate the feasibility of including additional space within the energy centre, to help facilitate the development of the Haringey heat network. The Flood Risk Assessment and Water Strategy are contradictory and should be clarified. A fresh approach to the drainage regime is required for the application to be considered compliant with London Plan Policy 5:13.
- **Air quality**: The short term impacts on NO2 and PM10 concentrations should be re-modelled based on around 30 matches per year during the football season, plus 16 events during the summer months. The applicant should confirm that the cleanest possible diesel-fired generators will be used.

200 On balance, while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan for the reasons set out above; however the possible remedies set out above could address these deficiencies.

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Transport for London

Our ref: 15/3477
Your ref: HGY/2015/3000

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28 October 2015

Dear Neil

Re: Northumberland Park, LB Haringey – TfL's initial comments

I write following receipt of the Transport Assessment (TA) dated September 2015 submitted in support of the above referable planning application to the London Borough of Haringey. The non event day element of these proposals were subject to TfL pre-application discussions and an advice letter on those matters only was issued on the 9th September 2015.

Similarly, TfL's comments within this letter are split into two sections; the first will relate to the event day impact only and the second will relate to the non event day impact. Notwithstanding that there will be issues raised that are common to both sections.

The following comments represent the views of Transport for London officers and are made on a "without prejudice" basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. These comments also do not necessarily represent the views of the Greater London Authority.

Site and Surrounding Area

The site is bounded by the A1010 High Road to the west, Northumberland Park, the Tottenham UTC and Tottenham FC offices to the north, Worcester Avenue to the east and Park Lane to the south. Whilst the High Road is part of the strategic road network (SRN), the nearest part of the Transport for London Road Network (TLRN) is the A10 at Bruce Grove. In addition the site is approximately 1km south of the A406/Fore Street junction which is also part of the TLRN.

There are ten bus routes serving this area with bus stops located on the High Road and on Northumberland Park. White Hart Lane station is approximately 200m to the west and provides access to London Overground services to

Liverpool Street, Enfield Town and Chestnut stations. Northumberland Park station is approximately 600m to the east and provides access to services on the Tottenham Hale branch of the Lea Valley line. The nearest underground station is Tottenham Hale on the Victoria Line, approximately 2.2 km to the south east. Although Seven Sisters is actually further away, at 2.3m to the south, it is however perceived as being more accessible to this area given the short bus interchange on Tottenham High Road and the direct walking route. The overall site records a Public Transport Accessibility Level of (PTAL) of 4 on a scale of 1 to 6, where 6 is classed as excellent.

Cycling Superhighway 1 (CS1), currently under construction, will link this area (the route terminates at Church Road) with the City (terminating at Liverpool Street to the south). It will avoid major roads and will provide a new alternative route with improved cycling facilities.

Major events – football matches, NFL and concerts

Impact assessment

To applicant has used match day survey data in May 2014 to inform the trip generation for match days. TfL welcomes the use of up to date data, however the applicant should clarify how this mode split has been recorded within the Transport Assessment (TA). TfL understands from pre-application discussions that ‘spectator club’ data has been used; this needs to be confirmed within the TA. Furthermore, it would appear that this data only relates to weekday matches and considering that the level of public transport service is greater on weekdays, the applicant should also provide a weekend split. Furthermore, where a modal split has been provided, the applicant should provide the actual number of trips that these equate to as TfL have had to make assumptions to derive the actual trip numbers for the time being.

Using arrival profiles from a combination of data recorded at both White Hart Lane on March 2008 and Emirates Stadium during the 2006 season, the applicant has assumed that the majority of spectators (55%) will enter through the stadium gateline 30 minutes before kick off. For departures, 75% of spectators will have left through the stadium gateline 15 minutes after the final whistle.

The applicant has assumed that approximately 60% of fans will spend at least 45 minutes or more in the local area pre-match (TfL has assumed that this is before they enter through the gateline however this should be clarified). This equates to almost 37,000 people which seems high. The applicant has assumed that 30% of home spectators (17,400) and 5% of away spectators (150) will spend time in the local area post match waiting for crowds to dissipate however it is not clear to what extent their dwell time will be.

The applicant has submitted a pre and post match entertainment programme however this relates to a 15.00 weekend kick off only, for which the applicant has not submitted any assumed dwell times. On that basis, the applicant should provide the expected dwell times for the weekend fixtures and conversely the proposed entertainment programme for a weekday game. Encouraging a smoother arrival and departure profile is an important element in avoiding queues at public transport hubs. It is also requested that the departure profile for a home game loss is provided as it expected that the departure profile will differ with less fans dwelling in the local area post game.

With regards to proposals for the two National Football League (NFL) games per season, the applicant has used data derived from assumptions recorded within Tim Spencer & Co's 'NfL and Concert versus PL at NDP (24th June 2015)'. This document should be provided so TfL can understand the methodology adopted.

The NFL match is assumed to take place on a Sunday and the arrival profiles have been derived from observations of NFL games at Wembley Stadium in 2014. The arrival profiles for football and NFL are similar however the data indicates that there is a smoother profile post-match with a departure peak of 40% 15-30 minutes after the final whistle.

To assess the impact of a concert scenario, the applicant has assumed a venue capacity between 45,000 and 55,000 and that it will occur on a Saturday evening between 20.00 and 22.00. A steady flow of visitors into the stadium between 15 and 90 minutes has been assumed however it is not clear on what grounds these assumptions have been made and this needs to be clarified – have these been observed from other concert venues? The modal split assumptions have been derived from the June 2015 document requested above.

The applicant has then subsequently assessed the impact of these three scenarios on the following:

- Local bus network
- Pedestrian network
- Highway and car parking
- Coach demand
- Cycle network
- Taxi demand
- Tottenham Hale interchange
- Seven Sisters interchange
- Rail capacity

And TfL comments on each of these assessments are as follows:

Bus network

A bus mode share of 10.5% for home spectators and 13% for away spectators is predicted for arriving at the stadium and this decreases for home spectators to 8% on departure and remains the same for away spectators. TfL is satisfied that there will not be a detrimental impact on bus capacity as this site is well served by bus services. Nevertheless it is noted that public realm works proposed on the High Road will necessitate the relocation of existing bus stops and this will need to be discussed in more detail with TfL.

Pedestrian network

The applicant predicts that 3% of spectators will use walking as their main mode to and from the stadium and has undertaken capacity assessments on the most heavily used routes which connect the stadium to the various transport interchanges. To establish the network capacity the applicant has used link lengths to allow for an estimation of walk times. The pedestrian widths have been captured by using mapping of the local area. Walk speeds have been assumed to be 1.5m/s on walkways (0.2m/s faster than TfL's station planning figure of 1.3m/s).

A Pedestrian Environment Review System (PERS) audit has been provided and TfL considers the scope appropriate. It has identified numerous improvements to the local area which includes the widening of footways where appropriate. In particular the applicant has identified that there are safety issues caused by the 1.9m pinch point on the High Road pavement in front of 750 High Road which can cause pedestrians to walk into the adjoining southbound bus lane.

In principle, TfL does not object to a widening of the footway on the High Road however, however as the High Road is part of the SRN and a key bus corridor, any highway amendments will need to be agreed with TfL and the impact on bus and traffic performance understood. The applicant should also confirm how the other deficiencies will be remedied as part of the package of mitigation required in accordance with London Plan policy 6.10 '*Walking'*.

The assessments on station capacity is covered in further detail within later sections of this letter however queues outside stations will be a frequent occurrence and on that basis the applicant should confirm to what extent these will impact on the pedestrian environment.

Highway and car parking

The applicant has already committed to an expanded major event day controlled parking zone (CPZ) secured through a section 106 agreement. The Haringey CPZ is now two-thirds complete and the Enfield scheme will follow in the next few years.

The car parking on site has been increased from the 319 spaces previously proposed to 822 spaces. The applicant has stated that this will be offset by a reduction of 870 off street spaces in the local surrounding area as other sites within the local area are redeveloped. When the grass pitch is retracted the number of spaces is reduced by 217 to 518.

For departing home spectators a car mode split of 23% has been assumed and for away spectators this is 10%. This is consistent with that assumed with the 2010 scheme and represents a notable reduction from the mode split of 45.6%, last recorded in 2014 (although in table 7-5 and 7-6 it refers to a survey date of 19th March 2008 which is assumed to be a typo). The predicted car mode share for both NFL and concerts is notably lower.

A map of off-street parking availability has been provided and identifies 22 sites potentially available for parking. The quantum of off street parking spaces will reduce from 1,800 to 1,675 and this will be complimented by 900 new on street parking spaces, in addition to the 1,350 existing on street spaces which give a total of 5,725 spaces. TfL requests that the applicant clarifies whether 'old' refers to extant permission or the existing conditions and how an additional 900 on street spaces are delivered.

The applicant should confirm what walk distance has been used to establish the boundary where parking capacity has been included as it is important that this aligns with the maximum distance a car user would be willing to walk to the stadium once parked. In addition, the applicant should justify why in the context of a significantly reduced car mode share the on site car parking proposed has been increased.

As with the 2010 scheme, no highway impact assessment of major event day traffic has been undertaken on the assumption that the level of vehicular use is capped as existing and TfL considers this reasonable.

Coach demand

Coach parking requirements are related to demand from the away spectators for a football game and total coach demand is forecasted to be less than 30 coaches per game which is expected to be accommodated within the nearby industrial area. The applicant states that coach management for the NFL games will be similar to the football scenario and it is assumed that this is relevant for the concert scenario too. The coach mode share for the away fans is 16% and for the home fans 1.5% however the coach mode share for all NFL visitors is 5%.

Considering that only 4.92% of the total football stadium capacity is allocated for the away spectators, the applicant should confirm what the maximum coach demand will be for the NFL games, as it could be a greater generator of coach

trips and demonstrate that sufficient capacity exists within the local area. An assessment on coach demand for concerts would also be required. The applicant has proposed for overspill demand to be accommodated on Pretoria Road however it should be clarified how this will be managed with parking controls present.

Taxi demand

The taxi mode share for home spectators is expected to be 1.7%; slightly lower than the 2.0% mode share for NFL and 3% for concerts. It is welcomed that a taxi rank to serve the stadium is proposed on Park Lane, though the applicant should provide additional detail on its capacity and operation. Provision will also need to be made for Private Hire Vehicles (PHV). TfL also requests that a taxi and PHV management plan is secured by condition. More discussion with TfL is required on these matters and the extent of marshalling required.

Cycle network

A cycling mode share for the major events of only 1% is expected. The route of CS1 referred to above will avoid major roads and provide an alternative to the High Road to the south. Although not formally designated, Park Lane offers a continuation of CS1. It should therefore be designed to offer at least the same level of service for cycling as that provided by CS1 on Church Road. However, the drawings submitted show Park Lane as being considerably wider, and with servicing facilities close to the junction. These features significantly diminish the cycling level of service provided by CS1 and sever its continuity as an appealing cycling route, instead of enhancing it.

On that basis and in accordance with London Plan policy 6.9 ‘Cycling’ the applicant should review the design of Park Lane and propose a layout that at least matches, though preferably improves, the cycling level of service of CS1.

The applicant has failed to provide a detailed assessment of cycling accessibility to the site. We recommend that the applicant provide a study of ‘cycling level of service’ (CLoS) of existing streets in the vicinity of the new development, following the methodology explained in section 2.3.4 of London Cycle Design Standards (LCDS). This approach would help identify severance issues and which crossings and links are fundamental to access the site. It is also recommended that an assessment of junctions in close vicinity of the development is performed to inform scoring of the collision risk criteria in the CLoS Assessment (LCDS Chapter 2.3.6). Overall, this will provide a clear picture of the most important safety issues to cycle to/from the site and will inform which improvements could be made to provide a safer access to cyclists.

Rail capacity

The capacity of the future London Overground rolling stock (CL 710/1 AC fleet) will be 689, not the 859 as stated in section 8.4.1 of the TA. Even overestimating train capacity, the applicant has identified that rail capacity is constrained for pre-match northbound rail services from Seven Sisters (between 18:15 and 19:30) and Tottenham Hale (between 18.00 and 18.00) during the evening peak. TfL would expect the applicant to reassess the impact of match demand using the correct rail capacity.

Post match queueing is predicted at all local stations and this is considered below for specific stations. At the weekend pre match, no capacity constraints are predicted on the Tottenham Hale branch however, there will be some capacity constraints on the Seven Sisters branch as the peak arrival period between 13:45 and 14.00 coincides with a significant gap in service.

White hart Lane

This station is expected to accommodate 21% of all spectators in the pre-match period and 20% post match. As such for the weekday post match period, the maximum queue length for an individual outside the station will be 21 minutes for northbound services and 32 minutes for southbound. For weekend matches the northbound wait will be up to 12 minutes and southbound, up to 29 minutes. For the NFL this is expected to be 22% and 19% respectively with 45 minute southbound queues and no northbound queues. For the concert scenario 13,200 attendees will arrive at the station and 11,550 will depart, this equates to a queue of up to 29 minutes for a southbound service and no queue for northbound services.

Queuing illustrations have been provided. If the southbound queue for the station is on the southern side of Whitehall Street for the 55,000 capacity concert scenario then the queue would extend onto the High Road. The alternative queueing arrangement on the northern side of Whitehall Street includes queueing in space that would be occupied by parked vehicles. This would extend the queue further into the High Road.

The southbound queue is shown as starting within the footprint of the proposed ticket hall and as the queue is proposed to be held outside the ticket hall, this would also result in the queue extending onto the High Road. The weekend matchday and 55,000 concert scenarios show the queue spilling onto the carriageway on Love Lane which would not be acceptable and therefore the queue would extend onto the High Road.

The preferred option for access to the northbound platforms as part the proposed station upgrade design is still to be confirmed. One option is the arrangement used in the queuing illustrations but other options include retaining the existing staircase and access through the new ticket hall.

Section 7.4.1 of the TA suggests that the station upgrade is expected to increase platform capacity, however this is not the case. Staircase capacity could be increased to aid platform clearance but not the platform capacity itself.

The applicant recommends the use of a wider stair width of 4m to serve both platforms which would enable a full trainload to access and egress within the minimum train headway. The expected cost of delivering these works would be £2 million.

Northumberland Park

For match days, the station is expected to accommodate 13% of spectators in the pre-match period and 14% in the post-match period. This equates to no queues pre match and queues of 33 minutes and 35 minutes for northbound and southbound services respectively. The applicant states that the station itself will have capacity to accommodate forecast flows.

Interchange (Seven Sisters and Tottenham Hale)

TfL considers the 2021 forecast and applied background growth used to be acceptable and it should be noted that Railplan 2011-2021 pm peak growth forecasts suggests that Tottenham Hale will experience greater growth than Seven Sisters. RODS data suggests that there has already been 20-25% growth in usage at Tottenham Hale since 2011.

TfL would have expected the applicant to consider the operation of the stations with Railplan 2031 background growth as this would represent the future growth expected on the Victoria Line.

The applicant has used estimates of capacity from 2008 surveys rather than the station planning guidelines for Seven Sisters which means there is no allowance for service disruptions. The station planning guidelines have been developed to ensure that there is a safety case for the levels of crowding operated. The assessment does not make it clear if the stations would fail when assessed using these guidelines and TfL would expect this to be addressed.

Seven Sisters

For midweek matches, 24% of spectators will use Seven Sisters during the pre-match period, the majority of which will exit the station and walk to the stadium. Approximately half will interchange to London Overground services or onto local buses. Post match, 23% of spectators will use the station and the profile is similar to the pre match except approximately 1000 people

interchanging from London Overground instead of bus services. This arrival profile is very similar for the weekend match days.

The applicant has identified that during the midweek pre-match period there will be capacity constraints on London Overground services travelling northbound and those who choose to interchange onto these services will have to wait for up to two services to pass before being able to board. All station vertical circulation elements have been deemed to provide sufficient capacity.

During the post match period the applicant also concludes that there would be sufficient capacity. However, queues can be expected at the times of peak interchange and a maximum ‘shuffling’ (as characterised by the applicant) queue of 250 people could be expected where passengers will pass from the London Overground services to the Victoria Line escalators. More information on what the consequences are of ‘shuffling’ is required – what level of service does this refer to and what are the impacts on station operation and how will this be expected to be managed?

Usage of this station will be greater for NFL games and passengers will have to wait for the third or fourth northbound London Overground service during the pre-match period and this would result in platform loadings in excess of 1,000 people. For the post match period queues will form outside the station and the maximum delay will be one minute. A ‘shuffling’ queue of 100 people is expected at the top of escalator from London Overground services to the Victoria Line. As above, the level of services this equates to needs to be clarified.

There is not expected to be any impact on Seven Sisters during the arrival period of a 55,000 capacity concert and during departures there is expected to be a queue of up to 13 minutes for entry into the station. Internally, there will be small ‘shuffling’ queue of 50 people queueing at the escalator. For the 45,000 capacity this queue time falls to 8 minutes however there will be an internal queue of 100 people for the escalator from London Overground services to the Victoria Line. It is not clear why for a smaller capacity concert approximately 500 more people will use seven sisters and why this equates to smaller queues outside the station and this should be clarified.

For entry into the station the applicant has used the capacity of the Wide Aisle Gate however it should be noted that this capacity is bi-directional and therefore if the full capacity is allocated towards entry then the applicant should confirm how passengers will exit the station.

Current signage directs spectators via the Seven Sisters Road exit which is a smaller gateline. A signage review will assist in ensuring that spectators will make the best use of the station capacity when exiting the station.

The conversion of the staircase into an escalator could elevate vertical congestion and improve the vertical flow of passengers. The applicant should note however that the expected cost of delivering these works would be £3.6 million.

Tottenham Hale

TfL has now received tenders for the main design and build contract for the £32m upgrade of Tottenham Hale station. Following TfL review and assurance, the contractor will be appointed in early 2016. The upgraded station will be open by autumn 2017. The scheme design is integrated with the upgrade of the West Anglia Main line and DfT's funded 'Access for All' bridge, both being delivered by Network Rail.

During the pre-match period for a midweek match 13% of spectators will use the station with just under half exiting the station and walking to the stadium. Approximately 35% will interchange onto the Shuttle Bus with the remainder interchanging onto Abellio Greater Anglia services to Northumberland Park. The weekend scenario is similar, however there are 1% fewer spectators using the station. Post match, 15% of spectators will use the station of which the majority will walk from the stadium and the remainder will be split evenly between interchanging from rail services and shuttle buses. The weekend scenario is again similar; however there will be 3% more spectators using the station and approximately 500 more spectators using the Shuttle Bus than rail services.

During the pre-match midweek period the applicant has identified that the most significant constraint on station capacity is access to the escalators/stairs from the Victoria line platforms and analysis has shown that some queueing can be expected for at least 45 minutes and if the stairs are not used this would be for two hours. TfL has assumed that this conclusion is based on using 32 trains per hour however, this should be clarified. Post match queues are envisioned of up to six minutes and no capacity constraints are expected as spectator management will hold crowds outside the station. It should be noted that should queueing within the station ever present a safety concern then trains would no longer call at that station.

No capacity constraints are expected during the weekend primarily due to the lower volumes of non spectator travel.

For the NFL games, subject to the use of the stairs, no impact on station operation is expected and there will be queues of up to 3 minutes post match outside the station. For the concert scenarios the impact is similar however the queue outside the station will be up to 13 minutes.

The assessment assumes that the station upgrade will be complete when the new stadium is operational. However should the applicant consider how the

station will operate should the new stadium be delivered before the station upgrade would be completed.

The proposed queueing route into the station conflicts with the location of TfL's consented pop up commercial development, which is due to be opened in early 2016 and this needs to be revised accordingly.

The applicant states that planned train frequency increases will assist in reducing the escalator queues. Whilst TfL acknowledges that greater capacity on the Victoria line is an advantage, this will not mitigate the impact on station capacity, rather the effect will be less time between trains for the platform to clear. During periods when the service is only 32tph, the queues will be expected to peak.

Replacing the central staircase with an escalator would create greater vertical capacity which would enable the platforms to clear more smoothly when demand peaks, particularly in the mid week pre match period. To minimise the impact on station operation it would be beneficial to deliver this at the same time as the station upgrade works referred to above. Furthermore, additional vertical capacity could only be utilised with gateline expansion.

In order to mitigate the impact of additional match day demand, minimise the impact of queuing and support the proposed mode shift to public transport, TfL recommends that additional escalator capacity is provided at one of the Victoria Line stations. As with the 2010 scheme, the applicant predicts that additional demand for underground services should be encouraged at Tottenham Hale. Given the planned and recent upgrades at this interchange, TfL concurs with this strategy. As for Seven Sisters, the expected cost of an additional escalator would be £3.6 million, but if delivered with the station upgrade it would reduce to £3 million. TfL welcomes further discussion with the applicant about securing a contribution to help deliver these works.

Shuttle Bus

Two services will be operated to and from the stadium; one between Tottenham Hale and the other from Alexandra Palace via Wood Green. The former will be a premium service tailored towards those with one of the 9,000 seats at Box and Club level with the latter operated as a standard service. The demand is expected to be split 75%:25% between Alexandra Palace and Wood Green station. For all scenarios it is expected that a 2-3 minute frequency will lead to a worst case maximum wait time of up to 21 minutes however more commonly it will be six minutes.

The applicant has stated this service will play an important role in offering a range of modes for those visiting the stadium and potentially reducing the impact on other parts of the network. More information is required before TfL can fully understand the potential of this service. For example, the frequency of

2-3 minutes appears quite high and therefore it would be useful to clarify how many buses this would equate to and also how long the journey time would be. In addition, the applicant should clarify how they have assumed the number of users of the service.

It is understood that operational space requirements will be negotiated at the time of contracting an operator.

Cycle parking

The applicant does not propose any staff cycle parking for the stadium as there is already a provision at Lillywhite House. The applicant should confirm the quantum of those spaces before TfL can consider this approach acceptable.

The applicant has stated that the current public cycling facilities are poor and it is therefore welcomed that a cycling strategy will be prepared which will provide dispersed cycle parking facilities that can be securely managed on Major Event Days.

Although there are no specific London Plan cycle standards for a stadium, the applicant could consider a cinema as a place of assembly to be comparable. This land use has a requirement of one space per 50 seats which in this instance would correspond to 1,120 spaces. This quantum will provide sufficient capacity for the 1% mode share predicted and allow for some future proofing as this number will be sufficient to also accommodate a 2% mode share (which would be a realistic travel plan target). More discussion on this matter would be welcomed.

Full details of the cycle strategy will secured through the section 106 agreement which is welcomed and TfL would wish to be party to its approval in conjunction with Haringey Council.

Travel Planning

No event day travel plans have been submitted with this application. As travel plans were secured with the 2010 consent, the applicant should clarify whether these would be updated as this would be expected. A draft stadium travel plan should be provided for TfL to review as our role in managing much of the public network in the area will be important in ensuring that spectators are well informed of their travel options and encouraging modal shift away from private vehicle use and peak times on public transport.

Non event day impacts – residential, hotel, serviced apartments etc

TfL provided pre application advice on the non event day element on the scheme in September 2015.

Baseline assessment

The baseline data has been updated using video surveys undertaken in July 2015 and have observed that traffic flows are 25% lower than expected with the PM peak 50% lower than assumed in the 2010 assessment. TfL does not have any Automatic Traffic Count data at this location and has obtained the DFT data that has been used in this assessment and confirms that the data is valid.

TfL's traffic flow forecasts for 2021 and 2031 shows a trend increase in peak car trips of 1.5% between 2012 to 2021 and a 3% reduction from 2021 to 2031, equating to an overall reduction in car traffic of 1.5%. Freight traffic levels are expected to fall in the AM peak between 2012 and 2031 however the PM peak will increase significantly by 27% during this same time period. It should be noted that freight traffic represents approximately 20% of traffic flow. These figures provide general trends and should not be used explicitly as they are dependent on different assumptions with varying levels of confidence for each.

The northern development is fully completed and occupied. However we note that the Sainsbury's supermarket is only trading at the level of the much smaller store that it replaced. A possible reason for this is that the current demographic of the area does not meet the target demographic for this type of foodstore. With the planned quantum of new development in the Tottenham area, this is likely to change in the future and the retail store would eventually meet trading expectations. On that basis TfL requests that the store trips included in the future baseline are those calculated in the 2010 assessment.

General approach

The applicant should provide a multi-modal split including all modes of public transport for all land uses proposed. Currently, only the residential and serviced apartment assessment includes an assessment on all modes of transport.

Only the peak hour assessment has been provided however TfL will require the all day trips for validation purposes. This will highlight any peak anomalies. The applicant should provide a total trip generation figure for a weekday and weekend which incorporates all proposed land uses.

Residential

A multi-modal trip generation has been undertaken for the residential element of the proposals. TfL is satisfied that the residential trips, in isolation, will not have an impact on the capacity of the local bus network. The applicant has not assessed how many of the trips boarding at Northumberland Park and White Hart Lane then subsequently interchange onto Victoria Line. RODS 2014 data shows that 39% of boarders at Seven Sisters in the AM peak were from Network Rail services, which equates to 14% of the southbound line loads into Finsbury Park. It is clear therefore that interchange from London Overground services could have an impact on train capacity and this will need to be assessed.

To derive the vehicular trips the applicant has used comparator sites associated with the Emirates Stadium project in Holloway and in Highbury. Any survey data that has been collected from those schemes should ideally be made available to TRICS so it can be compared to other sites within London. TfL's preferred method would be for person trip generation which is then disseminated by hour and mode and to use data that is already in TRICS or can be submitted for use in the TRICS database for reason of future scrutiny.

Video surveys for the three largest parking areas at certain Holloway developments have also been undertaken. The number of surveyed units is 1,160 coupled with 860 parking spaces. The parking ratios range from 0.62 to 0.82 spaces per unit, however the parking utilisation is closer to 0.55 spaces per unit. At Holloway, the car driver trip generation per unit is 0.14 two way trips per day. Per allocated parking space this equates to 0.28 trips and as above it would be beneficial to see this calculation in a multi-modal context. The applicant has therefore assumed a total trip generation of 3.5 2-way trips per day which equates to a car driver modal split of 4%.

The applicant states that the propensity for a private vehicle to be used for a journey to work trip in Haringey is 39.6% and the percentage for car travel is 19.6% of all travel to work journeys. TfL has assumed this data has originated from the 2011 census. The equivalent Islington statistics combine to show car use for journey to work trips at 9.9% of all journeys. The applicant concludes that the daily car trip generation in Islington is thus 40% of the journey to work percentage (4% surveyed at the Holloway sites compared to 9.9%). The applicant then assumed a similar relationship in Haringey and have proposed a 8.9% mode share which is significantly lower than the car trip rate for a car owning household in the new development which would be 0.67 per unit with a car mode share of 19.1%.

TfL recommends ward data is used, if census data was to be used then there are uncertainties as the time of travel or the extent of travel for non-work reasons. If the car travel to work is accepted as a proxy for other reasons to travel during the peak, then TfL suggests applying that percentage direct to the

person trip rate. For the Northumberland Park ward this is 23% and in Highbury West it is 8%. If it is accepted that the surveyed Holloway sites have a modal split of 4% (half that of the residing ward) then a car share of 11.5% could be considered an equivalent assumption for this development.

The applicant assumes that the daily car trips will be generally very similar to those sites surveyed in Holloway. TfL does not accept this assumption, though we do accept that this development will have a lower car use than census data shows. TfL is concerned that the adopted approach is overly complex and a simpler approach using TRICS validated data and the ward census data should therefore be adopted.

Tottenham Experience and non-event day attractions

The non-event day attractions and associated annual visitor numbers are predicted as follows:

- 81,180 – conference facility
- 120,000 – museum, stadium tour and store ('Tottenham Experience')
- 96,600 – sky walk
- 100,000 – extreme sports venue

The visitor numbers originate from work undertaken by Quad which has included reviewing data for similar facilities. Commercial / corporate events in the stadium will be busier in the autumn and spring, with social events peaking in November to January. The Tottenham Experience and Sky Walk will be busiest during the school holiday periods. It is also expected that these attractions will become established as international tourist attractions, so visitor numbers will follow London's seasonal trend. To account for seasonality a 'busy day' has been assessed which has increased the main traffic forecast by 25% above the average as assessed across a year.

It is expected that the extreme sports venue will be utilised all year and the applicant has not taken into account any trip discounting i.e. those visitors who choose to combine a Tottenham Experience and Sky Walk.

The applicant has calculated the trips for the 'Tottenham Experience' using Chelsea FC's average of 160,000 visitors per annum (p/a) in the last 5 years and Arsenal's visitor numbers of 120,000 last year. This is considered reasonable.

The extreme sports centre trips have been derived from those observed at climbing wall venues within London with that located in Bermondsey attracting 100,000-180,000 visits p/a and that located in Stoke Newington attracting 150,000 visits p/a. It is understood that the climbing wall is planned to be the tallest in the world and therefore TfL queries why the proposed visitor numbers are lower than the comparison sites, when they would be likely to exceed

them. We also note that a diving tank is proposed and would therefore assume that as this is currently a unique offering to London, visitor numbers would be even higher.

With regards to the Sky Walk and conferences / banqueting, the visitor numbers were taken from feasibility studies undertaken on behalf of the applicant. It would be useful to understand the assumptions / methodologies adopted by these studies before a conclusion can be made on their appropriateness.

As noted above the applicant considers that a busy day would generate a 25% increase in traffic to the site. It would be beneficial to understand why this figure has been assumed. The applicant should consider other similar attractions and how their annual trips vary between their maximum and average as this would provide an indicative uplift which can be applied.

The applicant should confirm how the modal split assumptions have been made and a comparison would be to look at census travel to work data and this can be reversed to see how those who work in the local ward travel there. The modal split for a work and leisure trip is unlikely to vary greatly.

TfL queries why during the hours of 8am - 9am there would 83 departures from these venues as this is not something that would usually be expected. This could suggest an over estimation of person peak trips or relate to a specific land use. The visitor traffic attraction discussed above is based on estimates of patronage. Staff travel will depend on shift patterns and visitor demand. TfL suggests employee travel needs to be added to understand the full picture.

Flexible community / office use

The applicant proposes 3,897sqm of flexible B1, D1, D2 floorspace, however because the end occupier is unknown the applicant has chosen not to do an assessment and instead proposes to submit a transport statement at reserved matters stage. The land uses applied for includes a wide variety of potential occupiers including offices, schools and places of worship. These are all potentially high trip attractors and therefore TfL considers that a robust assessment should be undertaken at this stage. On that basis, the applicant should consider what the worst case occupier of this space could be and undertake a trip generation exercise.

Health centre, hotel, serviced apartments

The applicant has provided a multi-modal impact assessment but has only disseminated the public transport trips into bus trips and therefore it is not clear how many visitors will be using London Underground or rail services. Furthermore, the conclusions do not seem realistic. For example, with regards to the hotel and serviced apartments the applicant has predicted there won’t be

any weekday peak hour bus trips (even for those using the bus to access other public transport services). In addition, no walk only trips are predicted for the hotel however there are notably more walking trips associated with the serviced apartments even though this land use would be a quarter of the size. It is understood that the assessment has used trip rates agreed for the 2010 application however the survey sites would be at least five years old and probably even more and therefore more up to date surveys would be preferable. In addition, where trip rates are presented as zero for a mode a manual adjustment would be reasonable, especially when the proximity of a Cycle Superhighway and a high frequency bus corridor are considered.

The applicant has not assessed the coach or taxi demand associated with the hotel development or serviced apartments and this will need to be provided.

Highway impact

As highlighted previously, the baseline traffic flows should include the northern development trip generation as originally predicted. The all day flows should also be provided to allow TfL to validate the peak trip numbers. Furthermore, based on TfL's comments on the applicant's vehicular trip generation assessment it is considered that these numbers could have been underestimated.

Car parking

It is not clear exactly what quantum of parking is proposed as the table which includes the car parking figures has not been included even though it has been referenced. The TA states that 243 spaces are proposed across two basement levels and this equates to a provision of 0.42 spaces per unit however the TA also states that car parking is forthcoming at a ratio of 0.47 spaces per unit which would equate to 275 spaces. This discrepancy should be clarified.

Irrespective of the overall quantum, this provision would include electrical vehicle charging points in line with London Plan policy which is supported. 27 Blue Badge spaces are also included. The applicant should note that the London Plan Housing SPG requires each wheelchair accessible unit to have access to a dedicated Blue Badge bay and assuming that 10% of the units will be wheelchair accessible this would equate to a requirement of 59 Blue Badge spaces. The applicant should demonstrate how these could be accommodated within the proposals.

The London Plan states that all development in areas of good public transport accessibility should aim for significantly less than one space per unit. Therefore, while a further reduction would be supported it is accepted that the proposals are broadly consistent with this policy and it is welcomed that the ratio has been reduced from the consented development.

For the hotel use, 53 spaces will be provided at basement level however it is not clear how many will be allocated as Blue Badge. This is an increase from the consented scheme and will need to be justified considering that the London Plan requires parking for hotel use that are located in areas of good PTAL to be limited to operational needs only.

The applicant proposes to introduce a non-event day visitor car park within Worcester Avenue including Blue Badge parking to the north and south. This will cater for visitor parking demand for the health centre, Tottenham Experience, stadium conferences and residential visitors. It is understood from pre-application discussions that this will equate to 56 Pay & Display bays. To allow TfL to understand the capacity utilisation of this car parking the applicant should provide a daily profile of car trips and an accumulation survey.

Cycle parking

No cycle parking is proposed to cater for the Stadium or Tottenham Experience as staff cycle parking is already provided at Lilywhite House. Before TfL can consider this acceptable the applicant should confirm what the maximum number of staff employed on site at any one time would equate to and confirm how many spaces are provided at Lilywhite House. In addition, the distance of these spaces from areas of employment will need to be clarified as TfL would not support spaces which require staff to walk long distances to their workplace once their bikes have been parked.

No short stay visitor spaces are proposed for the Tottenham Experience and this will need to be provided. As the use class is sui generis TfL would recommend that the London Plan standard for D2 land use class is used as a starting point and this requires 1 space per 100sqm of floorspace. In this instance this would equate to 73 spaces.

For the hotel land use the applicant proposes 12 spaces at basement level and TfL assumes that this is staff parking. On that basis short stay visitor spaces will also be required and this would equate to five spaces to be provided within the public realm. The spaces will be accessed via a ramp shared with vehicles. It is recommended that the gradient of the access ramp should not exceed 5% (1 in 20); however, short sections (up to 100m) can be steeper. The design of this entrance should also consider the fact that cyclists should not require to dismount. This is both an accessibility requirement for those using cycles as mobility aids as well as a practical recommendation. Furthermore, it is recommended that these spaces are located closer to the core as this will improve their accessibility and convenience.

12 spaces on Worcester Avenue are proposed however it is not clear how these will be allocated between short stay and long stay. TfL would expect any long stay staff spaces to be provided within the building as this will enhance their security. The standards are based on staff numbers and therefore this

needs to be clarified so this provision can be assessed against the policy requirements.

For the extreme sports facilities 16 spaces are proposed on Park Lane. Again it is not clear how this will be allocated between short stay and long stay. As above any staff parking should be within the building. Irrespective this provision is inadequate as the London Plan requires short stay spaces to be provided at 1 space per 100sqms or in this instance 21 spaces. Long stay spaces are based on staff numbers and therefore this needs to be confirmed.

872 spaces are provided for the residential units and this falls just short of the London Plan requirement of 882 spaces. Short stay spaces will be required at 1 space per 40 units which equates to 15 spaces. The long stay spaces will be located within four different storage areas located at ground floor. Access to three of the areas will be via double doors and TfL would recommend that that these are push button controlled. The largest cycle storage area is accessible either by lift and a narrow corridor or via Tower C's external lobby.

If lifts are used, they must be large enough to take all types of cycle. The LCDS recommends 1.2m by 2.3m as a minimum, with a minimum door opening of 1.0m. Ideally, lifts serving basement cycle parking should not be the same lifts that serve access to the residential units.

A corridor width of at least 2 metres is also recommended in order to allow for two people pushing cycles in opposing directions to use the facility or to the possibility that one or both cycles could be a larger model (such as a cargo cycle or adapted cycle). Right-angled turns should also be avoided.

No provision has been outlined for the flexible land use. TfL would expect the applicant to demonstrate that space is available to accommodate the maximum provision required from the range of land uses that could occupy this floorspace. A condition should then be sought which will require the delivery of the appropriate number of cycle spaces required upon occupation when the occupier (and therefore land use) is known.

All staff employed on site need to be provided with access to shower and changing facilities. Due to the size of the site these facilities should be provided across the whole site and close to cycle parking to ensure that they are convenient.

Taxis

It is not clear what the taxi demand will be as the taxi trips have been grouped with private vehicular use and it is requested that these are separated. In addition, private hire vehicle demand should also be provided. It is welcomed that a taxi rank is proposed on Park Lane however until this information is provided TfL is unable to comment on its suitability. As per the major event day

impact, more discussion is required with TfL to establish an appropriate facility which caters for these proposals.

Coaches

It is not evident what the coach demand for the hotel and non event day attractions will be. The London Plan requires one space per 50 hotel rooms or in this instance, four spaces. While it is accepted that this could represent an over provision in this particular case, the applicant should clarify what parking capacity is available on site.

Cycling and walking

Please see TfL's comments above regarding the cycling and walking infrastructure relevant to major events as TfL considers these applicable to both.

Delivery and servicing

The TA does not appear to include any information on the delivery and servicing requirements for the development or how this will be accommodated on site. Considering the nature of the proposals TfL would expect there to be a high number of freight trips associated with servicing and this will need to be accommodated appropriately to minimise any impact on the local highway network and without jeopardising the safety of pedestrian and cyclists.

Construction

The applicant predicts that construction traffic associated with the stadium will increase by 33% compared to the consented proposals however this can be reduced to only a 3% increase with use of a nearby construction compound. This equates to a peak construction traffic period of between May and June 2017 of 75 one way trips per day.

With regards to the southern development it is assumed that construction activity will be 3x greater than assessed in 2010. The peak construction traffic would occur from mid 2019 – late 2020 and equate to 13 one way trips per day.

In addition to the comparison of trips to the consented scheme it is requested that the applicant provides the uplift in construction trips from the baseline scenario. In addition, vehicular routings should be provided so TfL can understand their relationship with CS1 and an assessment of local junctions should be undertaken.

Given the scale of the development, a framework Construction and Logistic Plan (CLP) is required. The CLP should include the cumulative impacts of

construction traffic, likely construction trips generated, and mitigation proposed. Details should include; site access arrangements, booking systems, feasibility of using nearby mooring facilities, construction phasing, vehicular routes and scope for load consolidation or modal shift in order to reduce the number of road trips generated.

Travel planning

It is understood that the Travel Plans associated with the consented development will be updated and new ones added for the different aspects of development. These will need to provided to TfL for assessment prior to consent of any planning permission.

TfL would expect that Haringey Council will secure, enforce, monitor, review and ensure the funding of the travel plan through the Section 106 agreement to ensure conformity with London Plan policy 6.3 ‘Assessing transport capacity’.

Summary

To summarise, TfL will need to work closely with the applicant to ensure that the impact assessment is sufficiently robust as there are concerns that the trips have potentially been underestimated. More discussion would then follow to identify necessary mitigation and ensure that the scheme is designed appropriately to cater for the expected uplift in trips. In addition, amendments to the proposed cycle parking, car parking and scheme layout would all be required.

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A review of a Crowd Safety Options Appraisal undertaken for Tottenham Hotspur Athletic Football Club Ltd.

Abstract

The joint authors of the appraisal were Movement Strategies, Populous and T.Spencer & Co.

The appraisal addresses the safety and comfort levels for pedestrians using Tottenham High Road at a location in the immediate vicinity of the ground; data and analysis that is provided is directed at establishing that the proposed design of the stadium development is the most appropriate. The core content of the appraisal concerns Hazard and Risk. This review interrogates the methods adopted by the authors in reaching their conclusions.



Dr J F Dickie
October 9th 2015

Tottenham Hotspur Football Club - Crowd Safety Options Appraisal, [3]

1 Introduction

The commentary that follows examines the Movement Strategies study [3] concerning crowd safety issues relating to the feasibility and practicalities of retaining three listed buildings on Tottenham High Road namely, No. 746, No. 748, No.750, as illustrated in Fig.1.



Fig.1. Properties and associated walkway widths, (from planning document [3]).

The Planning Statement stresses the significance of crowd safety issues.

'A key determinant in the design of the revised scheme has been the need to address crowd safety and crowd flow issues along the High Road. The issue is longstanding, but now better understood. The Club and its design team are obliged to put crowd safety at the top of their priorities and the design of the new stadium and its context provides the ideal opportunity to address this issue.'

In addressing the crowd safety issue the study undertaken by Movement Strategies, [3] adopts Levels of Service, **LOS**, as a means of assessing risk and considers ALARP (**A**s **L**ow **A**s **R**easonably **P**ractical) the defining consideration. This writer would define the analysis as restrained. As subsequently discussed the assumptions adopted provide a lower bound (a conservative answer with regard to safety) which is the correct approach when uncertainties are present.

2 Movement Strategies, Populous and Spencer study [3]

Necessary data pertinent to the safety of arriving spectators on match days and other pedestrians using the High Street on match days was obtained from analysis of video footage. Data obtained during a 90 minute interval prior to a match on May 16th 2015, is illustrated in Fig.2 which is taken from the report.

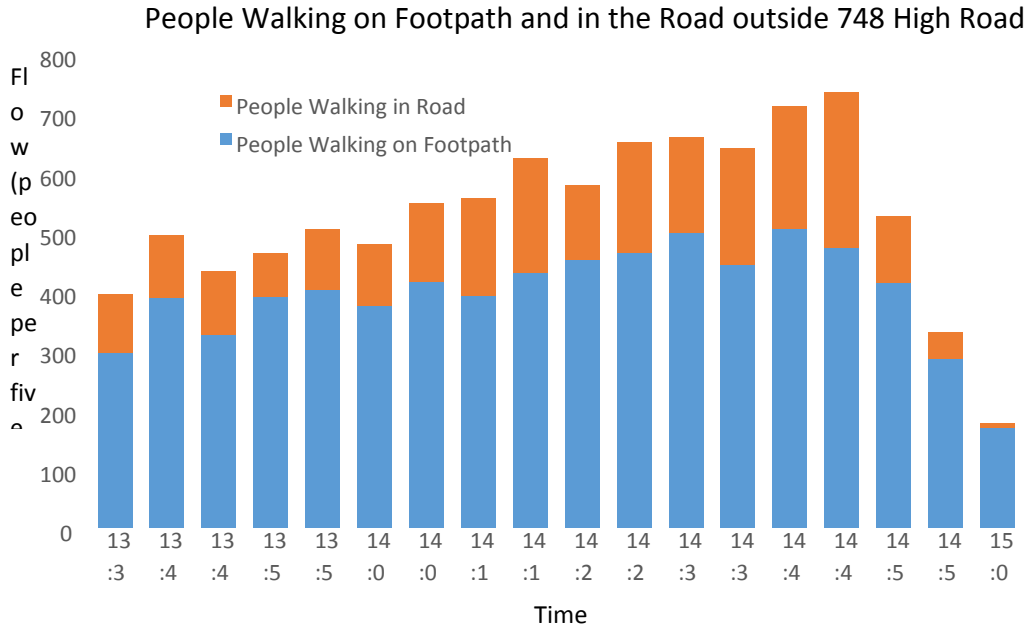


Fig.2. Typical video data as interrogated by Movement Strategies.

Where bulk arrivals from train and tube stations are present in a crowd flow the adoption of a five minute interval can mask their presence. The observed capacity of the walkway (effective width 1.8m in front of 748 High Road) appears to be approximately100 persons/minute which equates to 55persons/metre/minute, lower than might be assumed.

Fig.2 also informs that for 90min prior to match kick-off significant numbers of persons walk in the road.

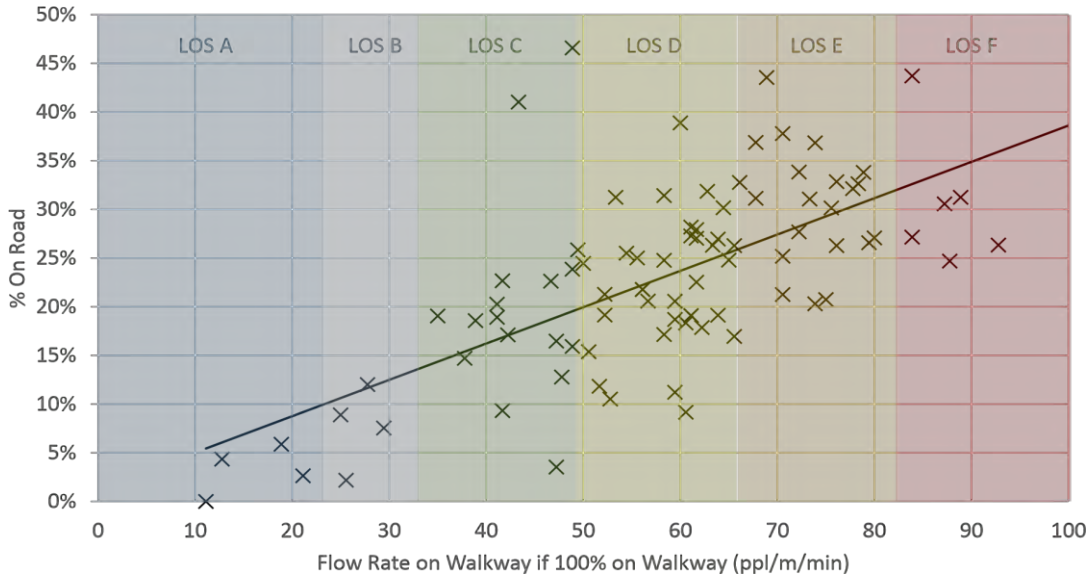


Fig.3 Surveyed Movements at 748 High Road (2.2m wide)[3].

A hypothetical flow rate at each location was derived by summing both elements of flow (on-walkway + on-road) and dividing by the walkway width at each location. Fig.3 illustrates data from surveys outside of 748 High Road. Similar graphs are presented for 750 High Road and a location north of Paxton Road. As would be expected the walkway widths at the locations were reflected in the percentages observed walking in the road. The results from video surveys established that:

1. The proportion of people walking in the road increases as the flow rate increases.

This is predictable. A walkway has a capacity above which pedestrians whose clock is ticking will hurry and walk in the road. What is also important and noted by the report's authors is that the crowd is made up of groups, pairs and singletons. Groups walk more slowly and individuals in a moving stream inevitably seek to overtake; this is the reason why even at low flowrates individuals will step into the road.

2. Contraflows were effectively equal in the vicinity of 748 and 750 High Road.

The scatter about the trend line reflects the nature of the flow. In a uniform flow scatter would not be present in the observed data. The scatter is indicative of a variable density and slower moving groups. The presence of persons walking in the road at very low densities is important. A flow rate of 10 persons/metre/min equates to 10 persons walking in single file **6m** apart with a walking speed of 1m/s. The average walking speed is normally about 1.4m/s

The presence of persons walking in the road at such low densities indicate to this writer that should an individual choose to step into the road to avoid conflict he or she will not necessarily elect to step back onto the walkway once the conflict no longer presents itself. A conflict does not mean an actual impact. A conflict is any stopping, changing of direction or breaking of normal walking pace due to a too close confrontation with another pedestrian.

A pedestrian in a disordered contraflow will make rapid adjustments in their direction of travel to avoid collisions. Inevitably as the density of the flows increase the present walkway widths cannot accommodate lateral movement and individuals are forced into the road.

The *Guide to Safety at Sports Grounds,[1]*, known as *The Green Guide,* is acknowledged to provide definitive guidance on matters relating to spectator safety. It is noteworthy that a **basic design principle** therein is

'Smooth, unimpeded flow through an exit route is best achieved by ensuring that the exit system does not narrow along its length.'

Whilst the emphasis in *The Green Guide* concerns egress the basic principle is equally applicable here and the current walkway provision fails to recognise the principle.

2.1 Provision for walkway comfort and safety

With regard to providing for walkway comfort and safety the planning report adopts two definitive documents, Fruin [2] and guidance issued by TFL [4]. Both documents address pedestrian spaces using Levels of Service (LOS). This concept originates from the research of Fruin that provided the source of the referenced work [2].

There are no standards or documents that comprehensively address what this writer would describe as unconstrained pedestrian flow which describes the present case.

Adopting the principles that provide the basis for Fruin's ground breaking study [2] and TFL's extension of the work [4] has to be considered sound practice.

The capacity of a corridor, where flow is constrained, is readily defined; when demand exceeds the capacity the resultant queuing at the mouth of the corridor is a well-known safety hazard as is the resultant risk.

The capacity of a walkway is not readily defined as on a walkway a pedestrian can thinkingly or unthinkingly step into the adjacent roadway and as a consequence expose himself or herself to a risk from a moving vehicle.

The TFL guidance in part concerns retail environments which is a category Tottenham High Road would belong in.

The planning report authors[1] rightly describe the TFL guidance [4] as being more generous in terms of space than Fruin [2].

The present concern does not relate directly to retail activity nevertheless it is significant that TLF guidance states that

'In high street or tourist areas the (footway) width can be reduced to 3.3m if there is no street furniture (except street lights). This width allows two group to pass.'

Fruin describes SIX Levels of Service (LOS A- LOS F) whereas the TFL Pedestrian Comfort Guidance whilst adopting a similar approach attempts to be more precise.

The planning document [3] discusses in a comprehensive manner Levels of Service as considered by both Fruin and TFL documents.

Movement Strategies concluded from a consideration of Fruin [2] that the appropriate target to reduce risk to a reasonable level should be LOS A/B (if practicable) and otherwise LOS B.

LOS A (>3.3m^2/person) flowrate of 23 persons/metre/min or less.

LOS B (2.3 – 3.3m^2/person) flowrate of 23- 33 persons/metre/min

Allows for an individual to select normal walking speed and to bypass other pedestrians in primarily one directional flow. Minor conflicts will arise in contraflow and the Level of Service is considered appropriate in a busy space where recurrent but not severe peaks occur.

LOS C (1.4 – 2.3m^2/person) flowrate of 33 – 49 persons/metre/min

and is described by Fruin[2] as follows

'…freedom to select individual walking speed and freely pass other pedestrians is limited…'

' …..Designs consistent with this level of service would represent reasonably fluid flow, however, considerable friction and interaction between pedestrians is likely to occur , particularly in multi-directional flow situations. Examples of this type of design would be

[1] Throughout this document the term *authors* refers to the authors of the planning document

heavily used transportation terminals, public buildings, or open spaces where severe peaking, combined with space restrictions, limit design flexibility.'

2.2 The consented scheme

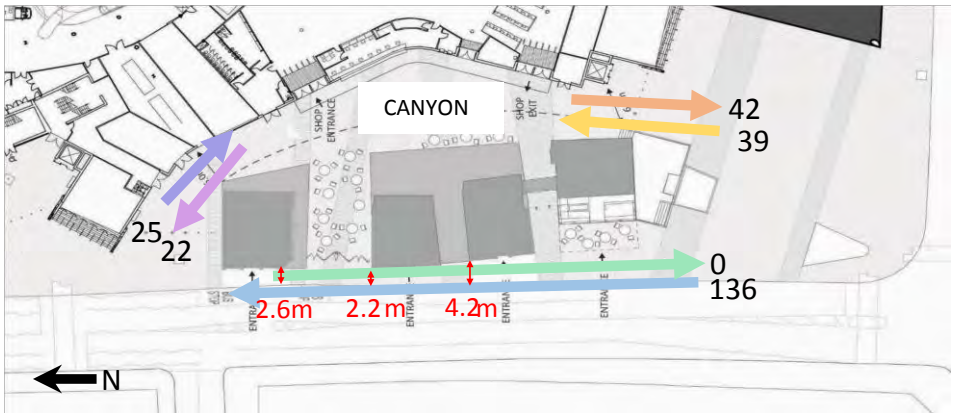


Fig.4. Forecast flows/minute in the consented scheme.[3].

Using the forecast flows illustrated in Fig.4 coupled with the effective widths the predicted flow at the 'pinchpoint' was derived as 76 persons/m/minute. The authors correctly conclude that this is not achievable given the composition of the spectator body and large numbers would inevitably walk in the road. Site data cements this conclusion.

The authors consider the possibility of diverting an element of the flow through the Canyon indicated in Fig.4.

TFL literature states

'....The current pedestrian traffic routes, walkways should be defined and evaluated as

*a) Do the pedestrian routes correspond to the **desire lines**?*

In this instance as recognised by the authors the desire line for persons approaching from the south will be the most direct line which the Canyon is not.

The authors present an ingress profile relative to time and focus on the fifteen minute interval prior to a week day evening kick-off; it is considered that 30% of the spectator population will arrive during this interval. During the 30 - 15min interval prior to kick off it is considered that 25% of the spectator population will arrive. It is assumed that the forecast flow rate of 185 persons/minute is derived from these assumptions. This is what was earlier referred to as a restrained analysis. The flow will not be uniform; there will be pockets of greater density and the assumption of a uniform flow will lead to an under estimate of actuality. As a consequence a restrained analysis resulting in an unacceptable solution correctly informs the designer as reality is more severe.

It is important to recognise as previously mentioned that flowrates derived from intervals greater than five minutes do not fully reflect the nature of bulk arrivals from a station should they be present.

Consider Fig.5 which illlustrates data concerning spectator arrivals at a sporting venue walking from a tube station. The tube station was approximately a 15min walk from the venue. The data was obtained using a minute interval count. The skyscraper characteristic evident in Fig.5 correlates with the arrival of tube trains.

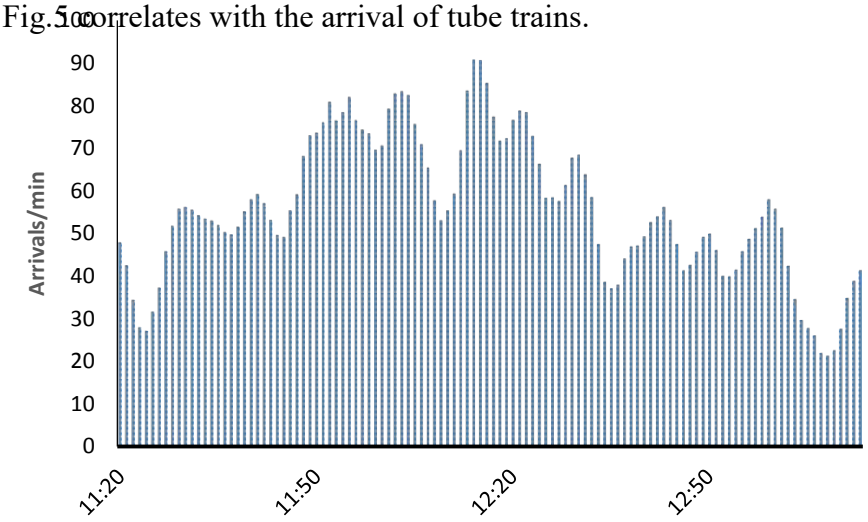


Fig.5 Typical characteristic of rate of spectator arrivals at a venue from a tube station .

This writer is not knowledgeable with regard to modal share of arrivals at THFC however the club website indicates that the walk from Seven Sisters tube station is 20min. Consequently for spectators using the tube there will be an element of bulk arrival. This creates a variable density in the flow in addition to that attributable to social groups.

There are commonly used and well understood expressions when describing egress following an event. 'Hard' finishes where all spectators depart immediately following final whistle and 'soft' finishes where spectators drift away prior to final whistle or depart slowly after the final whistle. A similar description for arrivals given the nature of the event from which the arrival data illustrated in Fig.5 would be a 'soft' arrival. For purposes of event management at the venue a 30min arrival plateau applied. It is apparent that peaks throughout the interval can be 20% greater that the design value.

The mid-week evening kick off has been adopted by the present scheme and using the foregoing terminology the match would create a 'hard' arrival.

Adopting Fruin, [2], the forecast Level of Service of the proposed scheme derived from a demand of 22 persons/m/minute is LOS A.

LOS B is considered to not create an unacceptable level of risk. LOS B allows for up to 33 persons/m/minute. A reasonable assumption would be that LOS A is conservative and LOS B could accommodate the likely bulk arrivals and variations in density due to social groups.

The forecast flow rate far exceeds the comfortable capacity of the present walkway which forces pedestrians into the road.

This writer considers that Movement Strategies conclusion that the consented scheme does not provide a reasonable level of safety is correct. With respect to safety there is a tenable argument that the assumptions adopted by Movement Strategies are conservative. Less conservative assumptions would add weight to their conclusion.

3 Alternative Options

The authors comprehensively consider 12 alternative options

1 The Consented Scheme with no crowd management.

An observer of recent stadium events in the Olympic Park would immediately dismiss this option. A primary egress route requires a diversion in the pedestrian flow of thirty percent. The absence of stewarding resulted in chaotic conditions due to spectators' desire line.

2 The Consented Scheme with barriers and stewarding and policing.

This option contemplates 100% of the crowd flow through the Canyon which is calculated to create a Level of Service C. Given the bulk arrival characteristic pockets of LOS D will be present and critical densities resulting in temporary stoppage are likely. In apparently removing one hazard, stepping into the road by large numbers of spectators, a hazard that creates a greater risk would be created. As is noted in the report an increased use of the western walkway will occur. Traffic speeds will increase and small numbers of pedestrians on the western walkway will 'jump' barriers to cross the road. TFL fatality statistics clearly demonstrate the level of risk associated with a manoeuvre of this nature.

Correct route geometry provides for an acceptable level of risk. Temporary barriers can be removed and knowledgeable spectators can and will circumvent the intentions of police and stewards.

The likely increase in numbers of spectators crossing the road in moving traffic streams creates an unacceptable level of risk.

3 Consented Scheme with temporary closure of the Southbound Bus Lane.

The operative word is temporary. A closure in excess of 60min., prior to kick off would be necessary. If Fig.5 of the authors' report is considered in conjunction with their Fig.15 a 90min closure would be necessary to prevent pedestrians moving into the road. Again using the stadium events in the Olympic Park as an example

Prior temporary closure – reopening – end of event closure of a relatively quiet road with a bus route was quickly dismissed as impractical.

4 Consented Scheme with Permanent Closure of the Southbound Bus Lane.

The forecast flow creates a LOS B with the associated risk of conflict. It is not clear to this writer as to whether the kerb and lack of continuity in level of the road surface has been included in deriving an effective width. If this is the case then the Level of Service will approach B/C. In either case given the ALARP requirement this option is not, as clearly stated by Movement Strategies, acceptable.

5 Consented Scheme with temporary Closure of Both Southbound Lanes.

The factor that negate this option is that given when considering Option 3.

6 Consented Scheme with temporary Closure of oth Southbound lanes and Contraflow on Northbound carriage.

The factor that negate this option is that given when considering Option 3.

7 Consented Scheme and Move High Road Westwards.

Whilst the writer is not competent to assess this option overall it is difficult to envisage the cost benefit equation resulting in a positive outcome

8 KSS Consented Scheme and Shared Surface on High Road.

The study considers that the option is not feasible on a match day. TFL statistics relating to fatal pedestrian vehicle accidents indicate absence of daylight and alcohol as significant risk factors, both are present here.

9 Consented Scheme and Tunnel the High Road.

Movement Strategies succinct conclusion based on deliverability is correct.

10 Consented Scheme and Flyover.

Conclusion regarding disproportionate benefits is indisputable.

11 KSS Consented Scheme and Pedestrian Bridge/Walkways.
12 Consented Scheme with Extended Podium.

Both options as noted by Movement Strategies are contrary to spectator' preferred choice of route. The present safety issue with the associated level of risk will remain.

With regard to the foregoing options it is important to recognise that a solution has also to address daily use. The consented scheme does not satisfy the TFL requirement concerning minimum walkway width which is 3.3m.

13 The Populous Scheme.

An Option Appraisal Summary is presented within the report that adopts crowd safety, traffic and highway and deliverability as primary criteria for acceptance. The Populous Scheme is considered to be the only option to satisfy all three criteria.

The question that quite properly should be addressed is -

What are the reasons that the consented scheme is no longer considered to be sound?

Recently developed areas of knowledge and understanding of hazards and their associated risks as applied to crowded areas were compartmentalised during the development of the scheme.

A risk is the chance that a hazard will actually cause someone harm.

The fourth edition of the Guide to Sports Grounds (1997) raised awareness that

'Absolute safety however desirable in theory is in reality, unattainable'

Architects and engineers began to quantify risk associated with crowded places.

Experts trained and experienced in risk assessment have become more successful in communicating with other professions about how they assess health and safety issues.

Consequently two factors are now established within professions involved in designing and managing major venues when defining level of risk namely Severity and Probability.

London 2012 brought to the attention of stadium operators and designers their responsibilities as regards the Last Mile alternatively known as the Grey Space outside of a venue.

The withdrawal of police from traffic management.

Whilst in this instance it can be argued on grounds of probability that the historical evidence indicates a low level of risk is present the severity of the risk associated with the consented scheme is catastrophic and therefore not acceptable.

CONCLUSION

The method adopted by Movement Strategies in the Crowd Safety Options Appraisal to identify the hazard related to walkway width and pedestrian flow is considered to be sound. The level of risk associated with the hazard, pedestrians being forced into a road, is not acceptable on the grounds of severity. The Populous design addresses the risk.

REFERENCES

1. DCMS *Guide to Safety at Sports Grounds.* Fifth edition 2008
2. Fruin J. *Pedestrian planning and design* 1971 Elevator World 1971
3. Movement Strategies, Populous, Tim Spencer & Co. Appendix C Planning Statement.
   Crowds Safety Options Appraisal Tottenham Hotspur Athletic Club Ltd.
4. TFL *Pedestrian Comfort Guidance for London* Guidance Document 2010.

Dr J F Dickie

The author's experience over a 30 year period relating to crowd movements and attendant safety issues embraces numerous major venues such as Wimbledon, Aintree, Ascot, London 2012 and Manchester United FC. Extensive studies relating to large scale retail developments such as Liverpool One and Leeds Trinity Square have been undertaken. He has made major contributions to National and European safety documents such as *The Guide to Safety at Sports Grounds* and *EN 13200-Spectator facilities.*

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PLANNING APPLICATION ENVIRONMENTAL STATEMENT ACOUSTIC REVIEW

Date: 28 October 2015

Application Reference: HGY 2015 3000

Site Address: Tottenham Hotspur Football Club, 748 High Road, London N17 0AP.

Application

1. Planning Application reference HGY 2015 3000, was submitted on 18 September 2015; seeking permission for proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works at Tottenham Hotspur Football Club, 748 High Road, London N17 0AP.

Summary

2. Sanctum Consultants are instructed by LB Haringey Council (the LPA) to review the Applicant's Environmental Statement; Noise and Vibration impact assessment (the Report), for planning application reference: HGY/2015/3000. And to review planning conditions attached to the previous extant scheme planning application reference: HGY/2010/1000.

3. The Report identifies that noise emanating from the construction and operational use of the proposed development is likely to have an adverse aural impact on local residents and future residents. And, may give rise to complaints of noise nuisance, prior to mitigation measures being implemented.

4. If the LPA is minded to grant planning permission, effective noise mitigation measures are required, to protect the aural amenity of local residents and reduce the likelihood of complaints of noise nuisance.

5. The development will take 6-7 years to construct, with construction work proposed for 12 hour working days, 7 days a week, at noise levels which are assessed as significant. In accordance with the provisions of the Control of Pollution Act 1974, Section 61; it is appropriate for the contractor or developer to agree noise and vibration requirements, and an appropriate noise monitoring and control regime, with the local authority, prior to construction.

6. The Report states the increased level of operational road traffic noise is assessed as insignificant, so no specific noise mitigation measures are necessary.

7. The proposed operational noise limits for fixed mechanical plant and equipment do not accord with Condition 50 of the previous extant scheme, reference: HGY/2010/1000.

8. No specific information regarding the proposed plant types and locations has been provided. Proposed fixed plant noise limits are derived from historic baseline noise data from 2008. Operational noise is likely to be audible at the façade of residential properties. Operating fixed plant at night-time, at **45 dBLAeq$_{8hr}$**, is likely to cause sleep disturbance, with windows open. To protect aural amenity, the LPA may therefore wish to consider retaining Conditions 50-52 from the extant scheme, reference: HGY/2010/1000.

9. Football event noise is predicted to increase by **0.4dB,** compared to the extant planning permission. This is likely to be an imperceptible change, so no additional noise mitigation measures are considered necessary.

10. The Report does not assess the noise impact of non-sport major events (concerts) in accordance with the Noise Council's Code of Practice on Environmental Noise Control at Concerts (CoP, 1995). Instead, the Report proposes to use a higher noise criterion, of **75 dB LAeq,$_{15min}$** for 6 music

concerts, and **75 dB $LAeq_{,event}$** for 10 non-football, sporting events (including 2 American Football, NFL matches).

11. To protect existing and future residents from noise pollution, the LPA may wish to consider retaining the extant Planning Condition 22 and not permit a higher noise criterion for music concerts. The LPA may also wish to consider amending and attaching Planning Conditions 17, 18, 20, 21, 23, to Non-Football Events and Non-Sport Major Events, from the extant planning permission.

12. The site suitability assessment concludes; to protect aural amenity, windows to the proposed residential development, should normally be kept closed, and a suitable form of mechanical ventilation installed. The LPA may wish to consider attaching a planning condition to ensure a suitable design criterion for windows and mechanical ventilation is implemented.

Introduction

13. Planning application reference: HGY/2010/1000 was previously granted conditional planning consent, under the provisions of the Town and Country Planning Act 1990, for the construction of a new Tottenham Hotspur Football Club Stadium, with associated non-football development.

14. Since the approval of application HGY/2010/1000 on 20 September 2011, the Applicant affirms, there 'has been a change in the Club's requirements (including technical requirements and specifications for a world class stadium).'

15. On 18 September 2015 the Applicant submitted a new planning application reference: HGY/2015/3000; for a redesigned Stadium with increased capacity, of 4,850 more than the extant scheme. The Applicant also seeks permission for non-football development including a 180 bedroom hotel, the 'Tottenham Experience' (incorporating existing Grade II Warmington House), sports centre, community heath building, four residential towers, community / office space and public realm works.

16. In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended). The Applicant has undertaken an Environmental Impact Assessment (EIA) for this 'Urban Development Project,' and submitted an Environmental Statement, dated September 2015, in support of the Application.

17. The EIA provides a systematic and objective process through which the likely significant environmental effects of a project can be identified, assessed and, wherever possible, mitigated.

18. Sanctum Consultants are instructed by the LPA to review the Applicant's Environmental Statement; Chapter 13 - Noise and Vibration impact assessment and Appendices 13.1-13.11. The Applicant's Report assesses the site's suitability for residential development and the likely impact from;
    - Construction Noise
    - Operational Road Traffic Noise
    - Operational Noise from Fixed Plant
    - Football Event Noise
    - Non-Football Sport Major Event Noise
    - Non-Sport Major Event Noise (Concerts)

19. Sanctum Consultants are also instructed to review noise and vibration planning conditions attached to the previous extant scheme reference: HGY/2010/1000. And, consider whether they should be applied to the new scheme, amended, or if additional conditions are required.

Material Considerations

20. When considering a planning application, the LPA has a statutory duty to have regard to the provisions of the National Planning Policy Framework, Development Plan and any other material considerations.

21. The National Planning Policy Framework, Planning Policy Guidance 11 (NPPF, PPG11) for Conserving and Enhancing the Natural Environment, states that Planning policies and decisions should aim to:
    a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;

b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions;
c) recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and
d) identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

22. The London Plan 2011 (as amended) sets out planning policies, strategies, and guidance at national and regional level. Policy 7.15 states, development proposals should seek to manage noise by:

a) avoiding significant adverse noise impacts on health and quality of life as a result of new development;
b) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business;
c) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);
d) separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout – in preference to sole reliance on sound insulation;
e) where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
f) having particular regard to the impact of aviation noise on noise sensitive development;

g) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

23. The Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) Schedule 2 section 10(b) 'Urban Development Projects' requires an Environmental Impact Assessment (EIA) to be undertaken when the proposed development exceeds an applicable threshold of 150 dwellings.

24. The Local Plan: Strategic Policies for Haringey is the main statutory plan for the LPA (from 18 March 2013), with saved Policies from the UDP (adopted 17 July 2006). The UDP contains a number of saved Environmental Protection Policies.

25. The LPA's Planning Policy UD3: General Principles states: 'the Council will require development proposals to demonstrate that: a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance.'

26. The LPA's Planning Policy ENV6 Noise Pollution states: 'the Council will ensure that new noise sensitive development is located away from existing, or planned sources of noise pollution. Potentially noisy developments should only be located in areas where ambient noise levels are already high and where measures are proposed to mitigate its impact.'

27. The LPA's Planning Policy CLT4: Hotels, Boarding Houses and Guest Houses states: 'applications for hotels, boarding houses and guest houses will be permitted provided that: c) the proposal does not have an adverse impact on the amenity of nearby residential properties or other uses. Proposals should not have an adverse impact on the environment by reason of noise, disturbance, traffic generation, exacerbation of parking problems, or detract from the character of the area. In general the local need for uses will be assessed in light of a strong presumption against the loss of residential accommodation.'

28. Noise is defined as ‘unwanted sound’ and deemed to be a material planning consideration which can have detrimental impacts to the amenity of noise sensitive residential receptors.

29. Noise is a material consideration where new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment.

30. The LPAs’ decision making should take account of the acoustic environment and consider:
    - whether or not a significant adverse effect is occurring or likely to occur;
    - whether or not an adverse effect is occurring or likely to occur; and
    - whether or not a good standard of amenity can be achieved.

31. The Explanatory Note of the Noise Policy Statement for England 2010 states; the significant observed adverse effect level is the level of noise exposure above which significant adverse effects on health and quality of life occur. The lowest observed adverse effect level is the level of noise exposure above which adverse effects on health and quality of life can be detected. No observed effect level is the level of noise exposure below which no effect at all on health or quality of life can be detected.

32. Excessive noise or ‘unwanted sound’ from any premises may cause a statutory noise nuisance under Section 79(1)(g) of the Environmental Protection Act 1990. Noise emitted from or caused by a vehicle, machinery or equipment in a street may cause statutory a noise nuisance under Section 79(ga).

33. There is no set level at which a noise becomes a nuisance. For noise to be deemed a statutory nuisance, the nuisance complained of must be, or likely to become, prejudicial to people’s health or wellbeing or cause unreasonable interference with a person's legitimate use and enjoyment of their home, materially impacting on comfort and amenity.

34. The ‘test’ of nuisance considers are number of factors; location, time of occurrence, duration, frequency, convention, importance and value to the community and difficulty in avoiding external effects of the activity and effect on receptors. Frequent, unreasonable, obtrusive noise resulting in impact to wellbeing and interference with a person’s use or enjoyment of their home or garden is more likely to amount to a statutory nuisance.

35. The frequency and nature of noise, along with the time (of day or night) when it occurs, its tone, character, duration, and effect are more likely to demonstrate material impacts to amenity or effects to wellbeing, than simple loudness. Noise which does not exceed background levels, may still amount to a nuisance.

36. Noise which relates to irregular bursts of sound and impulsive noise is more likely to cause noise nuisance, because of its sudden nature, intensity, and fluctuations in noise levels. Noise assessments which consider average ambient noise levels (LAeq) must be treated with caution, as ambient noise levels do not accurately depict how a recipient ‘hears’ or experiences noise as it occurs, or the sudden alarming effect of loud impulsive noise. Noise arising from a single event may amount to a statutory nuisance.

37. Environmental Health Practitioners are the recognised experts for assessing statutory nuisances and abating them through enforcement action, by service of an abatement notice under Section 80 of the Environmental Protection Act 1990.

38. Section 82 of the Environmental Protection Act 1990 enables summary proceedings to be issued by any person aggrieved by a statutory nuisance.

39. The phrase ‘amenity’ is defined as the extent to which people are able to enjoy public places and their own dwellings without undue disturbance or intrusion from nearby uses.

40. World Health Organisation Community Guidelines (WHO, 1999) provide guideline values for community noise in specific environments. For outdoor living areas, the noise guideline value for ‘serious annoyance, daytime and evening’ (07.00-23.00 hours) is **55 dBLAeq$_{16hour}$**, and for ‘moderate

annoyance, daytime and evening' **50 dBLAeq$_{16hour}$**. The level of noise outside bedrooms at night (23.00-07.00 hours) that is likely to result in sleep disturbance with the window open (outdoor values) is **45 dBLAeq$_{8hour}$**, and / or night time impulsive noise levels of **60dB LAmax**.

41. For inside, indoor living areas, the WHO noise guideline value for 'speech intelligibility and moderate annoyance, daytime and evening' is **35 dBLAeq$_{16hour}$**. For inside bedrooms, the noise guideline value for 'sleep disturbance, night-time' is **30 dBLAeq$_{8hour}$** or **45dB LAmax.**

42. BS8233:2014 provides guidance for the control of noise in and around buildings. It applies to the design of new buildings, or refurbished buildings undergoing a change of use, but does not provide guidance on assessing the effects of changes in the external noise levels to occupants of an existing building.

43. The Calculation of Road Traffic Noise (CRTN) 1988 and HD 213/11, revision 1, Design Manual for Roads and Bridges (DMRB), Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 7 Noise and Vibration are used to predict the likely change in road traffic noise as a result of a proposed development.

44. There is no set level at which a noise becomes a nuisance. Therefore the use of acoustic recordings in accordance with various prescribed criteria, such as BS 5228:2009 or BS4142:2014 cannot conclusively prove whether the level of a noise will or will not amount to a nuisance.

45. BS4142:2014 provides methods for comparing and rating the difference between the specific sound level of the source ($LAeq,_T$) and the typical background sound level ($LA90,_T$). If appropriate, the specific sound level is corrected, for acoustic features such as tonal qualities and/or impulsive noise, to give a 'rating' level (LAr,Tr).

46. BS4142:2014 allows additive corrections for tonality; **0 dB to +6 dB** for and impulsivity **0 dB to +9 dB**. Where the specific sound features are otherwise readily distinctive or comprise identifiable on/off conditions, a penalty of **+3 dB** may be applied.

47. Comparing the rating level with the background sound level, BS 4142:2014 states:
    - 'Typically, the greater this difference, the greater the magnitude of impact
    - A difference of around **+10 dB** or more is likely to be an indication of a significant adverse impact, depending on the context
    - A difference of around **+5 dB** is likely to be an indication of an adverse impact, depending on the context
    - The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact. Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context.'

48. If noise levels from a new noise source are predicted to be the same as existing background noise levels, noise is likely to be audible. If noise levels are predicted to be **5dB** below background levels, this should protect local amenity, although the noise source may still be audible. Noise levels predicted to be **10dB** below background will usually be inaudible.

49. The following general rules illustrate how changes in noise levels are perceived. A measured increase or decrease of **3dB** is usually regarded as the change in level that the average human ear can normally just detect. A measured increase or decrease of **5dB** represents a marginal difference. An increase or decrease of **10dB** represents a significant difference and sounds twice as loud.

50. The Licensing Act 2003 (as amended) requires that Licensing Authorities publish a Statement of Licensing Policy every 5 years. The Haringey (LA) Statement of Licensing Policy came into effect on 7 January 2011, and will remain in force for 5 years (until 6 January 2016).

51. The LA's Statement of Licensing Policy 2011-2014 promotes the four Licensing objectives:

    - prevention of crime and disorder;

- public safety;
- prevention of public nuisance;
- protection of children from harm.

52. The LA's Statement of Licensing Policy 2011-2014 states that 'Planning and Licensing are separate regimes and will be dealt with separately to avoid duplication and inefficiency' and 'the Licensing Authority will give appropriate weight to relevant Planning decisions and to the views of the Planning Authority on the compliance of the application with the licensing objectives.'

53. For music events, which rely on the use of high powered amplification, Acoustic Conditions attached to a Premises Licence should reflect guidance provided in the Noise Council's Code of Practice on Environmental Noise Control at Concerts published by the UK Noise Council in 1995 (CoP).

54. The CoP is designed to assist both LA's and event organisers, giving guidance on the prevention of public nuisance, setting 'Music Noise Levels' (MNLs) for the event, and procedures for dealing with noise complaints.

55. The CoP states, for urban stadia or arenas where 3 concert days are proposed per calendar year MNLs 'should not exceed **75dB(A) over a 15 minute period.'**

56. For all venues where 4-12 concert days are proposed per calendar year, the CoP states, MNLs 'should not exceed the background noise level by more than **15dB(A) over a 15 minute period'**.

57. The Control of Pollution Act 1974 Sections 60 and 61 provide the local authority with statutory powers to control noise (which includes vibration) arising from construction and demolition works, regardless of whether a statutory nuisance has been caused or is likely to be caused.

58. Section 60 enables a local authority to serve a notice of requirements for noise control on the person who appears to be carrying out, or to have control over, the works. Section 61 provides a mechanism for the contractor

or developer to approach the local authority to agree noise and vibration requirements prior to construction.

Limitations of Assessment

59. Sanctum Consultants are instructed to carry out a desktop review of the Applicant's Environmental Statement; Chapter 13 - Noise and Vibration Impact Assessment. The desktop review only considers information provided by the LPA and data provided in the Report, which has not been independently verified.

Baseline Noise Survey

60. The Applicant's baseline noise survey was undertaken between Tuesday 11 November and Monday 24 November 2008 at various locations detailed in the Report's Appendix 13.3. Continuous acoustic monitoring was undertaken at five unattended noise monitoring sites, obtaining weekday, and weekend data. The hourly measurement results for continuous monitoring are detailed in the Report's Appendix 13.5.

61. Attended acoustic monitoring was undertaken on 12 November 2008, at the existing White Hart Lane stadium before, during, and after an evening Carling Cup football match, to determine acoustic levels associated with a typical Premier League football match.

62. The Report states, 'as this was a relatively high scoring game with a final result of 4:2 to Tottenham Hotspur, the data collected is considered to be representative of 'worst case' conditions for noise during a match.' The acoustic levels measured inside and outside the stadium are detailed in the Report's Appendices 13.6-13.9.

63. A further 3-hour attended CRTN road traffic noise measurement on Park Road was undertaken on 19 November 2008.

64. The baseline noise survey identifies the dominant noise source as road traffic noise. The Report also identifies, 'background noise levels were

determined by the noise of fixed plant at the existing stadium or other commercial / industrial noise sources in the vicinity of a particular location.'

Acoustic Assessment – Construction Noise

65. The methodology adopted for the prediction of construction noise, is in accordance with BS 5228:2009. The Report states, the total construction phase is expected to be approximately 6 years, however this is based on construction works continuing for 12 hour working days, 7 days a week.

66. This does not accord with Planning Condition 40 of the extant planning permission, which states: 'no demolition, construction or building works shall be carried out except between the hours of 0800 and 1800 hours Monday to Friday or before 0800 and 1200 hours on Saturday and not at all on Sundays or bank holidays unless written approval from the Local Planning Authority has been obtained prior to works taking place.'

67. The Report affirms that, 'if the construction programme follows Haringey Council's standard construction hours (Monday to Friday 08:00 to 18:00 hours and Saturday 08:00 to 13:00 hours) the programme will be extended by one year.'

68. The Report proposes the LPA grant permission for extended periods of construction work, to include Saturdays 13:00 to 18:00 hours, and Sundays 08:00 to 18:00 hours. These are particularly noise sensitive times, when residents would not usually expect to be disturbed by noisy construction work.

69. The Report confirms 'the exact details regarding the construction phase plant and type, their locations etc are unknown' and proposes 'a detailed assessment should be undertaken once contractors are on board to determine the noise and vibration levels that will be generated and any necessary mitigation measures.'

70. The Report also confirms that 'people living within approximately 100m of the site are likely to be significantly affected by construction noise.' The predicted 'worst case' noise levels, at some of the nearest properties, could

exceed **75dB $LAeq_{,T}$** during the demolition, site preparation and/or piling and foundation phases. This noise impact is assessed as ‘Major Negative’ / ‘Significant,’ prior to noise mitigation measures being implemented.

71. Average construction noise levels are predicted to be below **75dB $LAeq_{,T}$**. Indicating that during core construction site hours, for the majority of the time, noise impact will not exceed ‘Moderate Negative’ / ‘Significant’ criteria, prior to the implementation of noise mitigation measures.

72. The ‘worst case’ vibration levels are predicted to be at Park Lane. Vibration levels are likely to be above **1.0 PPV mm/s**, which is assessed as ‘Moderate Negative’ / ‘Significant’. A ‘Negative’ effect or less is predicted at all other vibration sensitive residential receptors.

73. Mitigation measures for construction noise and vibration are proposed within a comprehensive Construction Environmental Management Plan (CEMP), operating the regulatory principal of using Best Practicable Means (BPM). For instance, auger piling is proposed to be the predominant method of piling, in preference to using driven piles, to reduce noise and vibration levels.

74. A construction compound is proposed at 44 White Hart Lane, London N17 8DP, to reduce noise impact from vehicular movement’s offsite, and to provide welfare facilities, a material storage area, and concrete batching plant. The use of the site as a construction compound is the subject of a separate planning application.

75. The Report does not state whether the contractor or developer will agree specific noise and vibration requirements, prior to construction, with the local authority, in accordance with the Control of Pollution Act 1974, Section 61.

76. The development will take 6-7 years to construct, with construction work proposed for 12 hour working days, 7 days a week, at noise levels which, at times, are assessed as significant. In accordance with the provisions of the Control of Pollution Act 1974, Section 61; it is appropriate for the contractor or developer to agree noise and vibration requirements, and an appropriate

noise monitoring and control regime, prior to construction, with the local authority.

77. A Section 61 Agreement provides an appropriate statutory mechanism, for assisting and expediting the construction programme. A Section 61 Agreement ensures a flexible, controlled, managed, and proactive, partnership approach is adopted for regulating the noise and vibration impacts predicted to arise during the construction phase of the Project.

78. If planning permission is granted, the LPA may wish to consider encouraging / requiring the developer to enter into a Control of Pollution Act 1974, Section 61 Agreement with the local authority.

Acoustic Assessment – Operational Road Traffic Noise

79. The methodology adopted for the prediction of changes in road traffic noise, is in accordance with the Department of Transport technical memorandum, Calculation of Road Traffic Noise (CRTN) 1988. And, HD 213/11, revision 1, Design Manual for Roads and Bridges (DMRB), Volume 11 Environmental Assessment, Section 3 Environmental Assessment Techniques, Part 7 Noise and Vibration.

80. Road traffic noise predictions, with and without the proposed development, have been undertaken using the Annual Average Daily Traffic (AADT) flows provided in Chapter 15 (CTRN, 1988) 'Traffic and Transport.' And, are 'based on the following assumptions:

- 50kph vehicle speed on all roads;
- Zero gradient on all roads; and
- Standard bituminous, impervious surface (e.g. hot rolled asphalt) on all roads.'

81. The Report states 'the assessment of operational road traffic noise is a worst-case assessment and does not consider the restrictions on car movements to the proposed residential and hotel developments on match days.' The Report assesses the change in the Annual Average Daily Traffic

(AADT) flows between the baseline year of 2015 and 2018, and 2015 and 2021.

82. The Report states, there will be a direct, permanent 'Negligible Impact' / 'Insignificant' on all road links, modelled for the transport assessment, with a potential increase in operational road traffic noise levels of **0 - 0.9 dBA**.

83. For Park Lane and Worcester Road, where road traffic flows are below the CRTN threshold, the Report states there will be a direct, permanent 'Minor Negative' Impact / 'Insignificant', with a potential increase in operational road traffic noise levels of **1.0 - 2.9 dBA**.

84. As the increased level of operational road traffic noise is assessed as insignificant, no specific noise mitigation measures are considered necessary.

Acoustic Assessment – Operational Noise from Fixed Plant

85. The appropriate methodology for the prediction of operational noise from fixed mechanical plant and equipment is in accordance with BS 4142:2014.

86. The Report confirms 'at this stage in the scheme design, no information regarding the proposed plant types and locations has been assessed - this will be determined during the detailed design stages.'

87. Introducing new noise sources, such as fixed mechanical plant and equipment, into an area, where residents are already exposed to relatively high ambient noise levels, may intensify daytime / evening and night-time disturbance and annoyance. Unless appropriate noise mitigation measures are implemented.

88. The Report states 'providing the cumulative effect from all building services plant on site can be designed to meet a rating level that is equal to the existing background noise level(s), at worst only negligible residual effects would remain.'

89. The Report proposes a daytime (07.00 - 23.00hrs) 'Cumulative Fixed Plant Noise Control Limit,' set at four monitoring locations, in the range **42-53 dBLAr$_{1hr}$**. The proposed daytime noise control limits are derived from the lowest daytime background noise levels (**LA90$_{1hr}$**), recorded during baseline noise monitoring in November 2008; at Park Lane, Northumberland Park, Worcester Avenue, and High Road.

90. The Report also proposes a night-time (23.00 - 07.00hrs), noise control limit, derived from the WHO guideline limit **45 dBLAeq$_{8hr}$**, for outside bedrooms, which may result in sleep disturbance with windows open.

91. The proposed operational noise limits for fixed plant do not accord with Condition 50 of the previously consented scheme, which states; 'at 1 metre outside the windows of any neighbouring habitable rooms the level of noise from plant and machinery shall be at all times at least **5 decibels** below the existing background noise levels, expressed in dB (A) at such locations. Where the noise from plant and machinery is tonal in character the differences in these levels shall be at least **10dB (A)**.'

92. No specific information regarding the proposed plant types and locations has been provided. Proposed fixed plant noise limits are derived from historic baseline noise data from 2008.

93. Operational noise is likely to be audible at the façade of residential properties. Operating fixed plant at night-time, at **45 dBLAeq$_{8hr}$**, may cause sleep disturbance, with windows open. To protect aural amenity, the LPA may therefore wish to consider retaining Conditions 50-52 from the extant scheme, reference: HGY/2010/1000.

Acoustic Assessment – Football Event Noise

94. For the acoustic assessment of football event noise, predicted noise levels are assessed against actual acoustic levels measured in November 2008. In addition, predicted noise levels from the proposed stadium are compared to predicted noise from the stadium approved in the extant permission (HGY/2010/1000).

95. The Report states, ‘the approach adopted has been for the assessment of crowd noise to be undertaken using measurement data taken over very short periods, typically 30 seconds. This time period encompasses most of the significant occurrences of crowd noise, for example when a goal has been scored.’ This approach is appropriate for the assessment of football event noise.

96. Football event noise is intermittent, varies, but can suddenly increase when thousands of supporters cheer a goal. The use of longer assessment periods will not provide a clear indication of how crowd noise might interfere with residential amenity, or how residents actually hear the noise.

97. Noise which relates to irregular bursts of sound and impulsive noise is more likely to cause noise nuisance, because of its sudden nature, intensity, and fluctuations in noise levels.

98. The Report also assesses predicted noise levels for the entire duration of a football match; including the pre-match announcements, pre-match music, crowd noise and half-time entertainment, for a 2 hour and 45 minute period.

99. The new Application proposes to increase the Stadium’s capacity from the consented scheme’s 56,250 capacity football stadium, to 61,100; hosting approximately 30 football matches per annum.

100. The Report states ‘the existing noise sensitive residential areas around the site already experience noise from the existing stadium and have done so for many years.’ And, the proposed stadium ‘is essentially very similar to that of the existing one and that approved under the extant permission being totally enclosed around the perimeter and although larger, it is a more substantial structure and so would be expected to provide a generally improved sound reduction performance with respect to noise break-out.’

101. The football event noise impact ‘has been assessed mainly on the basis of the noise level measurements made during the Tottenham Hotspur -v- Liverpool Carling Cup match played on the evening of Wednesday 12 November 2008.’ ‘Based simply on the increased number of spectators, the noise that they create within the stadium would be expected to increase by

0.4dB when comparing the proposed development with the extant permission and **2.3dB** when comparing the proposed development with the existing stadium.'

102. The Report states 'a similar assumption can be made for the noise from supporters making their way to the stadium on foot on the major routes between the stations and the ground for which the proportional change in numbers has been assumed to be similar to that of the increase in stadium capacity.'

103. The Report concludes, there will be a 'direct, permanent, Negligible to Minor effect at existing receptors as a result of stadium noise.' The Report also states, the proposed 'public address system and other such noise sources' have not yet been assessed and may cause noise disturbance. These 'will be addressed at the detailed design stage with mitigation measures recommended, where necessary.'

104. It is important, when carrying out a noise impact assessment to consider local character and convention, to determine what a reasonable person would find objectionable. Even though an activity may have economic importance, there should be a balance as to whether reasonable steps have been taken to minimise noise impacts on neighbouring noise sensitive residential occupants.

105. As the Report states that based on the increased number of spectators, the noise that they create within the new stadium would be expected to increase by **0.4dB** compared to the extant permission. And, a measured increase of **3dB** is usually regarded as the change in level that the average human ear can normally just detect. The change in noise level assessed against acoustic levels set out in the extant permission is likely to be imperceptible, so no additional noise mitigation measures are necessary.

106. The LPA may wish to consider attaching a planning condition to control noise emissions from the proposed public address system and any associated noise generating equipment, which have not yet been assessed.

Acoustic Assessment – Non-Football Event Noise & Non-Sport Major Event Noise (Concerts)

107. The Report confirms, 'the most appropriate source of guidance for assessing noise impact from music events is: The Noise Council's Code of practice on environmental noise control at concerts (CoP, 1995).'

108. The CoP states, for urban stadia or arenas where 3 concert days are proposed per calendar year Music Noise Levels (MNLs) 'should not exceed **75dB(A)** over a 15 minute period' at a point one meter from the façade of noise sensitive premises.

109. For all venues where 4-12 concert days are proposed per calendar year, the CoP states, MNLs 'should not exceed the background noise level by more than **15dB(A)** over a 15 minute period'.

110. However, the Report proposes a higher noise criterion of **75 dB $LAeq_{,15min}$** for 6 proposed music concerts, and **75 dB $LAeq_{,event}$** for 10 proposed non-football, sporting events (including 2 NFL matches), for the daytime / evening period (07.00hrs to 23:00 hours).

111. The noise criterion for non-football, major sporting events, stated in the Report, appears to be derived from the CoP noise criterion of **75 dB $LAeq_{,15min}$**. The Report states 'as these events will be sporadic throughout the year, much like the concerts, it is considered appropriate to assign the assessment criterion of **75 dB $LAeq_{,T}$** with the time period (T) being the duration of the event.'

112. Acoustic modelling has been carried out to predict acoustic levels emanating from non-football event noise and non-sport major event noise (concerts).

113. Noise from the proposed non-football events is assessed as different in character to a football match, with more frequent use of the public address system and music.

114. The predicted off-site NFL noise levels, at existing dwellings, are noticeably lower than the assessment criterion of **75 dB $LAeq_{,T}$**. The Report states

predicted noise levels from the music events will be at least **10dB** higher than the proposed NFL events.

115. During NFL events, Fan Zones are anticipated to be set up during and after the match, to accommodate a number of facilities including; food and beverage, potentially amplified music, and family friendly events. As details of the Fan Zones are currently unknown, the Report states, their noise impact not yet been assessed.

116. The Report concludes, as the predicted concert noise levels at existing receptors meet the proposed criterion of **75 dBLAeq** and NFL matches meet the target criterion of **75 dB $LAeq_{,event}$** no mitigation measures are necessary. And, 'there will be a direct, permanent, Negligible to Minor effect at existing receptors as a result of stadium noise.'

117. The Report does not assess the noise impact of non-sport major events (concerts) in accordance with the Noise Council's Code of Practice on Environmental Noise Control at Concerts (CoP, 1995). Instead, the Report proposes to use a higher noise criterion, of **75 dB $LAeq_{,15min}$** for 6 music concerts, and **75 dB $LAeq_{,event}$** for 10 non-football, sporting events (including 2 American Football, NFL matches).

118. The Applicant proposes to increase the Stadium's capacity from the extant permission of 56,250, with 4 non-football events per annum; to 61,100 capacity, with 30 football events, 6 non-sport major events (music concerts) and 16 non-football related events (including 2 NFL matches) per annum.

119. To protect the surrounding residents from noise pollution, rather than accepting the Applicant's proposed higher noise criterion, the LPA may wish to consider retaining the extant Planning Condition 22: 'for the music concert events hereby permitted, amplified sound from concerts within the stadium must be controlled in accordance with guidance provided by The Noise Council's Code of Practice on Environmental Noise Control at Concerts,' and not permit a higher noise criterion if planning permission is granted, for music concerts.

120. As the Report states that the noise impact from NFL events has not yet been fully assessed, and the proposed noise criterion / limit of **75 dB $LAeq_{,event}$** is relatively high. The LPA may wish to suitably adapt, amend, and attach appropriate Planning Conditions 17, 18, 20, 21, 23 for the extant planning permission, to regulate the proposed Non-Football Events and Non-Sport Major Events.

Acoustic Assessment – Site Suitability for Residential Development

121. The site's suitability for residential development assessment has appropriately been undertaken in accordance with the criteria in British Standard 8233 and the World Health Organisation's Guidelines for Community Noise. The target noise levels used for the assessment are the WHO noise guideline values; for inside habitable rooms; **35 dB$LAeq_{,16hour}$** (daytime), inside bedrooms, **30 dB$LAeq_{,8hour}$** and **45 dBLAFmax** (night-time).

122. The Report assesses the impact of the baseline road traffic noise survey results (2008), predicted future road traffic noise levels, and predicted acoustic levels from football matches, concerts, and NFL games.

123. The assessment concludes that to meet WHO internal target values, windows to the proposed residential towers should normally be kept closed. All residential units should therefore be provided with mechanical ventilation. But, windows should be designed to be openable, in case rapid or purge ventilation required, and to give future occupant's the choice to open their windows.

124. The Report concludes that with the above mitigation measures, there should be a direct, long-term Negligible impact on future noise sensitive residential receptors. And, recommends 'this assessment is revisited at the detailed design stage and that possibly another baseline noise survey be undertaken to validate the 2008 data.'

125. The site suitability assessment concludes, to protect aural amenity, windows to the proposed residential development, should normally be kept closed, and a suitable form of mechanical ventilation installed. The LPA may wish to

consider attaching a planning condition to ensure a suitable design criterion for windows and mechanical ventilation is implemented.

126. The Report recommends that ‘possibly’, another baseline noise survey is undertaken to validate the 2008 assessment data. The LPA may wish to consider attaching a suitable planning condition to ensure a noise impact assessment is undertaken (to validate the 2008 assessment data) prior to approving the window and mechanical ventilation design criteria.

127. The LPA may wish to consider adding an informative, for the attention of future residents, advising that windows to the proposed development should normally be kept closed to prevent a detriment to aural amenity.

Conclusion and Recommendations

128. For the reasons outlined above and having regard to all relevant material considerations, it is concluded that the Applicant’s Environmental Statement demonstrates that noise emanating from the construction and operational use of the proposed development, is likely to have an adverse aural impact on local residents and future residents, and may give rise to complaints of noise nuisance, prior to mitigation measures being implemented.

129. If the LPA is minded to grant planning permission, effective noise mitigation measures should be required, to protect the aural amenity of local residents and reduce the likelihood of complaints of noise nuisance.

130. The development will take 6-7 years to construct, with construction work proposed for 12 hour working days, 7 days a week, at noise levels which, at times, are assessed as significant. In accordance with the provisions of the Control of Pollution Act 1974, Section 61; it is appropriate for the contractor or developer to agree noise and vibration requirements, and an appropriate noise monitoring and control regime, with the local authority, prior to construction.

131. A Section 61 Agreement provides an appropriate statutory mechanism, for assisting and expediting the construction programme. A Section 61 Agreement ensures a flexible, controlled, managed, and proactive,

partnership approach is adopted for regulating the noise and vibration impacts predicted to arise during the construction phase of the Project.

132. As the increased level of operational road traffic noise is assessed as insignificant, no specific noise mitigation measures are considered necessary.

133. The proposed operational noise limits for fixed plant do not accord with Condition 50 of the previously consented scheme; 'at 1 metre outside the windows of any neighbouring habitable rooms the level of noise from plant and machinery shall be at all times at least **5 decibels** below the existing background noise levels, expressed in dB (A) at such locations. Where the noise from plant and machinery is tonal in character the differences in these levels shall be at least **10dB (A)**.'

134. No specific information regarding the proposed plant types and locations has been provided. Proposed fixed plant noise limits are derived from historic baseline noise data from 2008. Operational noise is likely to be audible at the façade of residential properties. Operational noise is likely to be audible at the façade of residential properties. Operating fixed plant at night-time, at **45 dBLAeq$_{8hr}$**, may cause sleep disturbance, with windows open. To protect aural amenity, the LPA may therefore wish to consider retaining Conditions 50-52 from the extant scheme, reference: HGY/2010/1000.

135. The level of football event noise created by the proposed increased number of spectators within the new stadium, and from travelling to and from the stadium, is predicted to increase by **0.4dB,** compared to the extant permission. As a measured increase of **3dB** is usually regarded as the change in level that the average human ear can normally just detect. The change in noise level assessed against acoustic levels set out in the extant permission is likely to be imperceptible, so no additional noise mitigation measures are necessary.

136. As the proposed 'public address system and other such noise sources' has not yet been assessed and may cause noise disturbance. The LPA may

wish to consider attaching a planning condition to control noise emissions from the football event public address system.

137. The Report does not assess the noise impact of the proposed non-sport major event noise events (concerts) in accordance with The Noise Council's Code of Practice on Environmental Noise Control at Concerts (CoP, 1995). A higher noise criterion is proposed, of **75 dB $LAeq_{,15min}$** for 6 music concerts, and **75 dB $LAeq_{,event}$** for 10 non-football, sporting events (including 2 NFL matches).

138. To protect existing and future residents from noise pollution, the LPA may wish to consider retaining the extant Planning Condition 22 and not permit a higher noise criterion for music concerts, at the planning stage.

139. The Report states that noise impact from NFL events has not yet been fully assessed. Therefore, the LPA may wish to amend and attach Planning Conditions 17, 18, 20, 21, 23 from the extant planning permission to both Non-Football Events and Non-Sport Major Events.

140. The site suitability assessment concludes, to protect aural amenity, windows to the proposed residential development, should normally be kept closed, and a suitable form of mechanical ventilation installed. The LPA may wish to consider attaching a planning condition to ensure a suitable design criterion for windows and mechanical ventilation is implemented.

141. The Report recommends that 'possibly', another baseline noise survey is undertaken to validate the 2008 baseline noise assessment data. The LPA may wish to consider attaching a suitable planning condition to ensure a noise impact assessment is undertaken (to validate the 2008 assessment data) prior to approving the window and mechanical ventilation design criteria.

142. The LPA may also wish to consider adding an informative, for the attention of future residents, advising that windows to the proposed development should normally be kept closed to prevent a detriment to aural amenity.

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Environmental Services and Community Safety

Tracie Evans – Chief Operating Officer

Neil McClellan
Planning

Date: 18th November 2015
Your ref:
Our ref:

Dear Neil

Re: Tottenham Hotspur Football Club, 748 High Road, London, N17 0AP
Planning application: - HGY/2015/3000

The above application is for proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001). The proposal is EIA development.
ADDITIONAL ENVIRONMENTAL INFORMATION HAS BEEN SUBMITTED AND IS VIEWABLE ON THE WEBSITE.

The following comments are made with consideration of the additional environmental information that has been submitted together with apposite conditions.

Air Quality:

The application site which includes a stadium, hotel, sports centre, residential and health centre is adjacent a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government's air quality objectives for nitrogen dioxide (NO_2) and PM2.5. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new exposure adjacent this major arterial route into London, the proposed residential units are located away from the High Road, adjacent the Park Lane / Worcester Avenue corner.

An air quality assessment (Air Quality Consultants, August 2015, ref: J2299) has been submitted along with the planning application to assess the air pollution impact of the proposed developments. The main air polluting operations associated with the entire site include 1224 car parking spaces and associated traffic movements, 13.5MW gas powered boilers and 4.5 MW diesel generators; assessed during peak periods of stadium use. The diesel generators are proposed to be used as a primary source of power on match days and event days, for which the air quality assessment has determined will have an adverse impact on air quality in the local area.

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The London Plan, Policy 7.14 states that new development should:

- minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans

- promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;

- be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

- Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

The use of polluting diesel powered generators as a primary power source is unsatisfactory and discouraging; especially in the light of the work being carried out towards improving air quality. Following discussions with the applicant additional information has been submitted specifically with regard to air quality and the use of the diesel generators. The 'Regulation 22 – Further Environmental Information' submitted (November 2015) states … *diesel generators will only be used for emergency backup generators on match day and will comply conform to the US Tier 3 (EU Stage IIIA). It is considered this will have a minimal impact on air quality on local receptors and remove the adverse impact to that of negligible'*....

Further information has been submitted via an AQ Note (Air Quality Consultants, November 2015). Section 3.1 of the AQ Note states '*THFC have committed to connecting to the UK Power Network (UKPN) for match day primary power provision, with no onsite power generation for match days'.* Further affirming that onsite power generation by diesel would only occur during emergency situations and that the generators will operate a maintenance schedule of a maximum of 1 hour per week (52 hours per year). The air quality impact will therefore be significantly reduced.

The aspiration is that in future the site will connect to a District Energy Network (DEN). However should this connection not be forthcoming then there will be a site-wide energy centre, operating gas fired CHP.
This is also confirmed by the Energy Strategy Clarification Note additional information (6th November 2015 Buro-Happold Engineering);

'*2.3 The indicative phasing plan for the Development anticipates that the stadium, the Tottenham Experience and the community health centre will form the first phase of development and should be operational in 2018. It is understood that the North Tottenham DEN will not be delivered by 2018 and there is a requirement therefore that the first phase of the Development will need its own energy source. The application proposes that these uses will be served by an energy centre to serve all the buildings in this phase, which in effect will function as a site-wide energy centre for phase one. The energy centre will be located within the stadium building and will be supplied from high efficiency gas-fired boilers*.'

And

'2.5 If the DEN is not operational in time for the delivery of these remaining elements of the Development, then in order to retain flexibility in terms of the timing, and sequence of these buildings coming forward, the application proposals make provision for each to meet their own energy requirements (probable interim gas boiler solution) pending connection to the proposed DEN. The solution will be developed to allow for a site-wide network to be connected to the DEN once operational.'

I recommend the following conditions:

Diesel Generators:

- The site shall not operate and no functions or events are to take place until UK Power Network is capable of supplying all electricity as needed during all events, including match days, NFL days, concert days and others. Confirmation and evidence of such electricity demand and supply shall be provided to the LPA from UK Power Network; for approval by the LPA and before the site can operate.

- Generators shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing as necessary to meet that purpose and shall not be used at any other time. At all times the generators shall be operated to minimise noise impacts and emissions of air pollutants and a log of operational hours shall be maintained and be available for inspection by the Local Planning Authority.

- The emergency back-up diesel generators installed for use on the site shall comply with the EU Stage V Emission Standards for Generator Set Engines. Evidence of compliance shall be provided to the LPA for approval prior to installation.

- The diesel generators shall run on ultra low sulphur diesel (ULSD) meeting the fuel specification within EN590:2004.

- Unless otherwise agreed in writing by the Local planning authority all combustion flues must terminate at least 1 m above the highest roof in the development in order to ensure maximum dispersion of pollutants.

Combustion and Energy Plant:

- Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh.

Reason: To protect local air quality.

- Prior to installation details of all the chimney heights calculations, diameters and locations (5No. boilers and 3No. generators) will be required to be submitted for approval by the LPA prior to construction.

Reason: To protect local air quality and ensure effective dispersal of emissions.

- Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA.

Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.

Contaminated land: (CON1 & CON2)

CON1:

- Before development commences other than for investigative work:

  a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical

  representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and

Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.

b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-

- a risk assessment to be undertaken,
- refinement of the Conceptual Model, and
- the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

And **CON2** :

- Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.

Management and Control of Dust:

- No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.

Reason: To Comply with Policy 7.14 of the London Plan

- Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.

Reason: To Comply with Policy 7.14 of the London Plan

- No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.

- An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and

service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

Reason: *To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.*

As an informative:

Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

Yours sincerely

Alison Bell.
Lead Officer - Pollution.

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Tottenham Note

Full planning permission is sought for the Stadium, the Tottenham Experience and the Hotel. Outline permission is sought for the Residential, Sports Centre and the Community Health Building.

Response to the original energy strategy submitted in September and the energy note submitted on the 6th Nov 2015.

1) Baseline data on emissions

Policy Background
London Plan Policy 5.2 requires all new development to achieve a 35% carbon reduction on site, or pay to offset any remaining emissions.

The Club Application and Issues
The energy calculations (and carbon emissions) provided are based on the development connecting to the local district energy network powered by an efficient heat and power units. But the club made it clear that the worst case scenario is that the scheme will have a single energy centre served by boilers. The emissions data presented do not reflect this.

The carbon emissions data is needed for both the best and the worst case. This will help the determination of the EIA and to calculate the potential carbon offsetting payments from the detailed application (Stadium, Experience, and Hotel). The club need to model the sites carbon emission based on the carbon factors of heat generated by single energy centre served by multiple boilers (the worse case). From this ensure that the overall carbon emissions are modelled. And that the 35% target is achieved. This is backed up by 5.2 of the London Plan and was also raised in the stage 1 report and at previous meetings with the club.

	Total carbon emissions to offset from the Stadium, Hotel and Experience (full applications)	**Value of offsetting** (at the nation price of £2,700 per tonne)
Best Case (connect to the area wide DEN)	Stadium – 342 tonnes of CO_2 Hotel – 108 tonnes of CO_2 Experience – 29.05 tonnes of CO_2 Total = 479.05 tonnes of CO_2	£1,293,435
Worst Case (a single energy centre serving the development site)	TBC	TBC

Mitigation via legal requirement
The total carbon emissions from submitted full planning applications (stadium, health centre, experience and hotel) need to be confirmed. This should be delivered as soon as possible. As this figure is needed to calculate any potential carbon offsetting funds that are required.

The carbon offsetting figure is then needed to be then included in the legal agreements so that the Council can “claw back” once the scheme makes profit.

The outline planning applications (health centre, residential and extreme sports centre) and their carbon reduction targets will be determined at reserve matters when they are submitted in design detail.

Ask for Planning Committee

That the committee require the applicant to issue a report to the planning committee on total carbon emissions for the detailed scheme (Hotel, Stadium and Tottenham Experience). And that should the required target of 35% reduction not be achieved that that the emissions from the development are offset at the cost of £2,700 per tonne. And that this offset payment is then made to the Council to deliver carbon reduction projects in the local area.

2) Clean (Energy networks)

Policy Background
All major planning applications must demonstrate how their energy systems have been selected in accordance with the order of preference in Policy 5.6 of the London Plan. Energy assessments will need to explicitly work through the order of preference and where an approach is not appropriate for the development the assessment must provide reasoned justification.

Specific comments on London Plan Policy 5.6

- LP Policy 5.6 A: the information submitted has not evaluated the feasibility of Combined Heat and Power (CHP) systems for the development nor have they evaluated the opportunity to extend their system beyond the site boundary.

- LP Policy 5.6 B: The submission broadly follows the DE hierarchy upon completion of all stages of development:
  i. A single site wide energy network connecting all residential and non residential buildings within the development and connection to the area wide decentralised energy network with a single point of connection will be pursued as the first priority
     - However proposed use of temporary plant rooms / energy centres likely to result in 3 temporary plant rooms (stadium, hotel, extreme sports) and multiple gas boilers operating on site prior to connection to the DE network when the residential element is constructed
  ii. Should an area wide DE network not come forward, a single site wide energy network connecting all residential and non residential buildings within the development and served by a single energy centre with CHP will be taken forward.
     - However proposed use of temporary plant rooms / energy centres likely to result in 3 temporary plant rooms (stadium, hotel, extreme sports) and multiple gas boilers operating on site until the final energy centre is constructed under the residential element of the southern

The Club Application and Issues
The submitted information (in September and 6th Nov 2015) has not set out how the development will comply with London Plan policy 5.6 and the DEN hierarchy. The request for additional information in Para 170, 172 and 173 from the GLA stage one report has not been responded to positively.

The applicant needs to demonstrate that an area wide DEN being served by the site has been investigated. Should it be technically feasible and viable the applicant is expected to deliver this. If it is not able to be delivered then justification will need to be given.

Should the area wide DEN not come forward, the applicant will be required to deliver a single energy centre on site serving the site. The high level schematics shown (in Energy strategy clarification note appendix B schematics) suggest that this is deliverable. And that it would be located under the residential units and

generate heat through the operation of multiple gas boilers. But these are high level drawings and no design drawings exist to show how this will be delivered.

The applicant promotes three options, and demonstrates that all three are viable and deliverable. These are connection to the area DEN, a site wide heating network, and multiple energy centres serving individual buildings. This last option is not policy compliant and this has highlighted by the GLA and Haringey.

The high level schematics shown (presented by the applicant in the Energy strategy clarification note appendix B schematics) suggest that the pipe network will be located under the retractable pitch / car park. And that pipes will be linked through basement walls. These connections across the site will need to be confirmed and delivered from the onset. This will mean that there is no costly retrofitting at a later and preclude the delivery of site wide network, and enable the development of the area wide DEN. The applicant also should demonstrate how the site wide heat network will connect to the area wide network. This needs to be confirmed with detailed drawings. This should be demonstrated through floor plans, size, location, flue exits, and layout to demonstrate in detail that the proposed energy strategy will be delivered.

To enable the area wide DEN to come forward the applicant will need to make a financial contribution to connect to the area wide DEN. These costs will be based on the avoided costs that they will be saving by not housing a single energy centre or related equipment on site. (This would be the avoided cost of constructing and housing a flue on site through the tallest building, the clean up technologies on site, and the CHP plant on site). Final costs will be determined.

Specifically the club needs to submit details on the following:

- Where are the pipes and the conduit space that will be constructed across the site to deliver the site wide network and connections? What will be constructed as part of phase one? How will future phases be constructed?
- Evidence that the site wide heat network has avoided all conflicts with other site wide utilities and SUDs network.
- Details on the site wide heating network design and operation parameters. The temporary boilers proposed (providing 5.6 MW of heat for the stadium and 3.2MW of heat for the hotel) should be designed to be decommissioned and removed once the area wide network is connected to the site. On decommissioning, will the temporary boilers be relocated to the single energy centre?
- Where are the punch points (through the concrete basement walls) to connect to the area wide DEN?
- Demonstrate that a site wide energy centre could be accommodated
- Flue details

Mitigation via legal requirement

The following will need to be picked up in the legal agreements and s106.

1. Agreement that the applicant agrees to use best endeavours to work with the Council or the Decentralised Energy Network supply company to deliver a connection and heat supply to the site. The owner shall connect the development to the DE network within [6] months of the network becoming operational.

2. Agreement that in the event that the Decentralised Energy Network does not come forward, all domestic and non domestic building uses will be connected to a single/communal site wide heat network by a single energy centre supplying all the heat demands of the development. [Does this need a trigger point? – suggested at the reserve matters application / or commencement on the residential tower but please lets discuss!]

3. The club will be conditioned to provide two sets of diagrams and associated commentary to the Council for approval on policy compliance. These details will be submitted to the Council for approval at least 3 months before the construction of the basement starts. Once approved the club will be required to deliver the proposals approved. (see notes 4, 5, and 6 below) These two models need to clearly set out:

   Model 1) How the site will link into the area wide district energy system serving all buildings and energy users across the site and how this will connect through a single entry point. As proposed in the Energy strategy clarification note section (section 3.1.2 of the Energy Strategy). This may include several temporary plant rooms, which would be decommissioned once the area wide network is delivered. Timeframes for decommissioning will need to be set out.

   Model 2) How the site will deliver a single energy network serving all buildings and energy users and be heated and powered through one energy centre. As proposed in the Energy strategy clarification note (dated 6th Nov 2015) appendix B schematics. Any temporary plant will be decommissioned and a timetable for this need to be clarified.

4. Prior to the commencement of the development [or other suitable trigger point], details of how the single/ communal network will connect through a **single point to an area wide DE network will be submitted to the Council for approval**. This should be 3 months prior to commencement on sit. This will set out how the communal network will serve the whole development and how it will be delivered. This shall be submitted for approved in writing to the Local Planning Authority. This shall include:
   a) The location and size of the required temporary energy centre (s);
   b) Details of connectivity to all units and phases of the development;
   c) The route of all appropriately sized pipe work between all buildings and that the pipe work will be delivered by the developer to the single point of exit to the area wide DEN;
   d) How the site wide network construction will be phased, and evidence that conflicts with other site utilities and SUDs network and the site wide heat network has been considered and avoided / mitigated;
   e) How individual phases (and their sub phase) will connect to the area wide DE network should a connection be available prior to completion of the Residential units;
   f) Detailed drawings on the location and space allocated for the temporary energy centre (s);
   g) The location and size of the flue serving the temporary energy centre (s);
   h) Details on the site wide heating network design and operation parameters (set out in GLA District Heating Manual for London (or its replacement) and the ADE/ CIBSE Heat Networks Code of Practice);
   i) Details and locations of the “punch points” through the building fabric linking all buildings and confirmation (with drawings/schematics) that there is easy and safeguarded access to these punch points;
   j) Details and locations of the “punch points” through the main basement wall to the public highway (with drawings/schematics) and that there is easy and safeguarded access to these punch points locations;
   k) A planned timetable for decommissioning of the plant on site (or that that they can be located to another site) once the area district energy network is developed;
   l) A valuation of the avoided costs that the applicant will be saving by not housing a single energy centre or area wide DEN on their site once connected to the area DEN. (this is the avoided cost of constructing and housing a flue on site, the clean up technologies on site, and the CHP / Boiler plant on site)

5. Prior to the commencement of the development [or other suitable trigger point], details of how the single/ communal network and **single energy centre** serving the whole development will be

delivered, shall be submitted for approval to the Local Planning Authority 3 months prior to commencement on site. This shall include:

a) Details of connectivity to all phases of the development;
b) Details on the size, layout and location of the final single energy centre, and point of connection to the public highway
c) Clear diagrams showing the flues from the generators and the energy centre and space for the required clean up technologies;
d) Indicative plant (including CHP size) and thermal store/buffer vessels with associated monthly demand profiles for heating, cooling and electrical loads
e) The route of all appropriately sized pipe work between all buildings and that the pipe work will be delivered by the developer to the single energy centre;
f) How the site wide network construction will be phased, and evidence that conflicts with other site utilities and SUDs network and the site wide heat network has been considered and avoided / mitigated
g) Detailed drawings on the location and space allocated for the energy centre (s);
h) Details on the site wide heating network design and operation parameters;
i) Details and locations of the "punch points" through the building fabric linking all buildings and confirmation (with drawings/schematics) that there is easy and safeguarded access to these punch points;
j) Details and locations of the "punch points" through the main basement wall to the public highway (with drawings/schematics) and that there is easy and safeguarded access to these punch points locations;
k) Demonstration that the site wide energy centre could accommodate a CHP if this is required;
l) Details on the boilers proposed (providing 5.6 MW of heat) in the single energy centre. These should be designed to be decommissioned and once the area wide network is connected to the site. Or that that they can be located to another site.
m) Space will need to be allocated for heat exchangers and heat rejection equipment.
n) Clear diagram showing the flues from the generators and the energy centre and space for the required clean up technologies;
o) A planned timetable for decommissioning of the plant in temporary plant rooms once the full onsite network is developed;

6. For all the detailed application elements of the application (currently stadium, Tottenham Experience and Hotel), Prior to the commencement of the development [or suitable trigger point], details of the single temporary plant room / energy centre, energy (heat and power) plant specifications, and communal network and future-proofing measures shall be submitted for approval to the Local Planning Authority 3 months prior to commencement on site.

   These details shall include:

   a. technical specifications for the temporary energy centre/plant room, and proposed plant and buffer vessels, and its operation
   b. evidence showing that the combustion plant to be installed meets an emissions standard of 40mg/kWh. Where any installations do not meet this emissions standard it should not be operated without the fitting of suitable NOx abatement equipment or technology as determined by a specialist to ensure comparable emissions following installation (emissions certificates will need to be provided)
   c. full details of the location and appearance of the flues, including height, design, location and sitting
   d. plan showing the temporary energy centre/plant room/s with details of the design of building services future-proofing and showing how the [first phase of] development will be designed to connect to the single site wide communal network and final energy centre,

such as punch points in the building fabric, plans showing external buried pipework routes and trench details, service entry pit and capped off pipe work stubs, and space allocation for a future heat exchanger if an indirect connection is proposed

e. how the full applications application (currently stadium, Tottenham Experience and Hotel) will connect to the area wide DE network should a connection be available prior to completion of the residential development
f. How the network construction will be phased, and evidence that conflicts with other site utilities and SUDs network and the site wide heat network has been considered and avoided / mitigated
g. details of other future proofing measures to enable connection to the site wide communal network and final energy centre
h. Details of the temporary flues from the generators and the energy centre and space for the required temporary clean up technologies;
i. Details on the Secondary system design including pressures and supply and return temperatures
j. A planned timetable for decommissioning of the plant in temporary plant rooms once the full onsite network is developed

Ask for Planning Committee
That committee expects that the club will connect to the area wide DEN and then decommission all independent heating plant on site. Or that the Club will deliver a single energy centre on site that serves all buildings and then decommission all heating plant not located in this energy centre. And that this single energy centre will be designed to easily connect to the area wide network.

Details of how this will happen will be submitted to the Council for approval at least 3 months before the construction of the basement starts.

That the application will demonstrate this before commence on site for the full applications (Stadium, Hotel and Sports Centre). And that this phase will ensure compatibility to the wider aspiration.

3) Green

Policy Background
London Plan policy 5.4 requires renewables to be investigated and were feasible delivered. Local Plan policy SP04 requires that 20% of a developments energy need is delivered through renewable technologies where viable.

The Club Application and Issues
The scheme does not deliver maximum opportunities to deliver carbon reduction through the use of renewable technologies (LP Policy 5.7). The application has included some PV panels on the residential tower (outline application). Delivering 0.5% of the energy needs across the whole site.

Mitigation via legal requirement
At detailed design stage of the outline applications (residential, Sport centre, Health centre) should use best endeavours to maximise the opportunities for the generation of electricity through the use of renewable technologies.

Ask for Planning Committee
That the committee highlights the lack of renewables on the full application (Stadium, Experience, and Hotel) and requires the applicant to issue a report at each full design application stage (for the residential, health centre and sports centre) to maximise delivery of renewable technologies working towards the 20% target.

4) Overheating

Policy Background
London Plan Policy 5.9 requires that the applicant needs to demonstrate by a dynamic thermal model using future weather patterns has been undertake to demonstrate that cooling risk is minimised. Working through the cooling hierarchy the applicant will have to demonstrate that the design of the development has minimised the overheating risk.

The Club Application and Issues
The developer has not delivered a dynamic thermal model to reduce the risk of overheating. Alongside this the developer has not designed the scheme to minimise over heating risk and reduce the need for mechanical cooling. This has been continually highlighted by Haringey Council and is in the GLA stage 1 letter.

It is expected that a dynamic thermal model using the London dataset, and future weather patterns model units / areas at most risk (south facing areas) in the following:

- Stadium
- Hotel
- Health Centre
- Experience
- Sports Centre
- Residential block

The design of these buildings should be reviewed to reduce the risk of overheating and minimise the use of mechanical cooling. Currently these buildings are predominately glazed and require to air conditioning to manage overheating risk. It is noted that the club have stated that air conditioning will remove the risk of overheating. But the local grid supply is weak (as highlighted by the club in their utilities and energy strategy) and with increased energy demand in the summer, this is seen as a high risk cooling strategy.

Design measures and the use of natural ventilation are expected and where these are not enough to guarantee the occupant's comfort (in line with the cooling hierarchy set out in London Plan Policy 5.9). Only then will the developer should identify the cooling requirement of the different elements of the development in the energy assessment document.

The residential, sports centre and health centre being at outline, these should be conditioned that these building can provide the dynamic thermal model at detailed design submission.

The health centre and the residential development must have a dynamic thermal model, due to the needs of the users who can be identified a vulnerable to heat stress. As submitted in the Energy note (dated 6th Nov 2015) the residential development will not be designed to include mechanical cooling.

Mitigation via legal requirement
The club will be conditioned to have undertaken a dynamic thermal model for the stadium, experience and the hotel. That all designed measures that can be installed are installed to minimise overheating risk. This should be sent to the Council for approval 3 months before the buildings start on site.

The club will be conditioned that at detailed design stage dynamic thermal modelling will be expected for the hotel, sports centre and residential block to ensure that overheating risk is designed out. This should be sent to the Council for approval at design stage.

These models will include:

- That air conditioning will only be permitted once all feasible design measures to reduce overheating risk have been delivered. (Policy 5.9 LP)
- That all glazing should achieve a minimum g value of 0.2 as set out in the Energy Note by BuroHapold (6/11/15)
- Air conditioning will not be permitted on the residential units, any community areas and health block (as put forward in the section 5.2, 5.4 and 6 of the energy strategy).

Ask from Committee

Due to the glazed design of the full and outline proposals that there is an overheating risk. The reliance on air conditioning to address this is a high risk strategy for the occupiers. The club has identified that there is a risk of electricity supply through a weak grid in the area. Therefore we seek that a dynamic thermal model is undertaken before the stadium, hotel and experience commence on site, and at the design stage of all outline applications. This should be modelled using future weather patterns which will cover the life time of the buildings.

The design of the building should have worked through the London Plan "Cooling Hierarchy" and be assessed to ensure that cooling design measures are delivered (reduced glazing, brise soleil, passive ventilation etc) to reduce the need for air conditioning.

5) General comments on the energy obligations as submitted

- Need to define "feasibility" and "viability" in terms of energy infrastructure. This needs to be approved by the Council and the GLA.

- Need to remove the statement found in 3.1.2 which states "if the owners concider sit is not feasible or viable to deliver" the council will determine if the case put forward by the club is sound based on policy.

- The word "capable" needs to be removed. This is none committal. Wordings need to be strengthened and should change to include "will deliver".

- Section 3.1 and up sections are unacceptable as this would accept that the scheme in non-policy compliant.

- Any legal obligation need to change reference from "the Council bring forward the DEN" to enable anyone to bring forward the DEN. It could be a private company.

- We need a tighter time frame for decommissioning temporary heat equipment to enable the single energy centre to be brought forward.

Skapoullis Jon

From: BCTAdmin@thameswater.co.uk
Sent: 09 October 2015 09:30
To: Planning Support
Subject: 3rd Party Planning Application - HGY/2015/3000 (HYBRID - FULL)

London Borough of Haringey
639 High Road
Tottenham
London
N17 8BD

Our DTS Ref: 2516
Your Ref: HGY/2015/3000 (HYBRID - FULL)

9 October 2015

Dear Sir/Madam

Re: TOTTENHAM HOTSPUR STADIUM, BILL NICHOLSON WAY, LONDON, N17

Waste Comments
Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at http://www.thameswater.co.uk/business/9993.htm or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to

prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:"A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

Water Comments
Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Supplementary Comments

We have no objection for surface water drainage strategy. Regarding foul water drainage our initial investigation has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Impact study is been undertaken to identify any necessary improvements to public sewage network. Study completion is expected in January 2016. When study will be completed we expect that developer will update drainage strategy accordingly to the outcome.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998

Email: devcon.team@thameswater.co.uk

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Argles James

From: Planning Support
Subject: FW: 3rd Party Planning Application - HGY/2015/3000 (HYBRID - FULL) - Further inform

London Borough of Haringey
639 High Road
inform
Tottenham
London
N17 8BD

Our DTS Ref: 2516
Your Ref: HGY/2015/3000 (HYBRID - FULL) - Further

24 November 2015

Dear Sir/Madam

Re: TOTTENHAM HOTSPUR STADIUM, BILL NICHOLSON WAY, LONDON, N17

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Following initial investigation, Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

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the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:"A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality."

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Water Comments
Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No impact piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Supplementary Comments

We have no objection for surface water drainage strategy. Regarding foul water drainage our initial investigation has identified an inability of the existing waste water infrastructure to accommodate the needs of this application. Impact study is been undertaken to identify any necessary improvements to public sewage network. Study completion is expected in January 2016. When study will be completed we expect that developer will update drainage strategy accordingly to the outcome.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ

creating a better place

Environment Agency

Neil McClellan
London Borough of Haringey
Development Control
By email:
neil.mcclellan@haringey.gov.uk

Our ref: NE/2015/123795/01-L01
Your ref: HGY/2015/3000

Date: 12 October 2015

Dear Neil

White Hart Lane Stadium, Bill Nicholson Way, 748 High Road, Tottenham, N17 0AP

Proposed demolition and comprehensive phased redevelopment for stadium (class D2) with hotel (class C1), Tottenham Experience (sui generis), sports centre (class D2); community (class D1) and/ or offices (class B1); housing (class C3); and health centre (class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. The proposal includes the demolition of 3 locally listed buildings. The proposal is EIA development. The application includes works to a listed building for which separate listed building consent is required. As such there is an associated listed building application for internal and external works to a grade ii listed building (744 High Road) (ref: HGY/2015/3001).

Thank you for consulting us with this planning application.

We have **no objections** to the development. The culverted Moselle Brook runs adjacent to the site, but all development falls outside the 8m byelaw buffer zone for development.

Informatives

Surface Water Drainage

This development has the opportunity to offer a significant contribution to ongoing need for sustainable drainage solutions in the Moselle Brook catchment. Although we no longer statutory consultees for surface water flood risk management we have previously looked at the proposals and note number of areas that we consider require further work. We recommend you liaise with Adam Littler at the Lead Local Flood Authority regarding the design of the surface water drainage scheme.

- The applicant has not demonstrated that the storage volume required to attenuate surface water run-off from the critical 1 in 100 chance in any year storm event, with an appropriate allowance for climate change, can be provided on site.
- The applicant has not demonstrated that sustainable drainage systems (SuDS) will be used on site to provide storage for surface water generated on site, in line with the National Planning Policy Framework paragraph 103, that requires development to give priority to the use of SuDS. SuDS can provide multiple betterment from reducing flood risk but also providing green infrastructure, improving water quality (which is known to be poor in this catchment) and improving habitats for wildlife.
- The applicant has not demonstrated that the peak discharge rate for all events up to and including the 1 in 100 chance in any year critical storm event, including an appropriate allowance for climate change, will not exceed 3 times the greenfield runoff rate. Where 3 times the greenfield runoff rate cannot be met, evidence must be provided that demonstrates the greatest feasible reduction has been achieved, which must be a minimum of a 50% reduction in line with the London Plan Supplementary Planning Guidance.

Guidance on the preparation of surface water strategies can be found in the Defra/Environment Agency publication "Preliminary rainfall run-off management for developments". Guidance on climate change allowances can be found within the ‘‘Planning Practice Guidance: Flood Risk and Coastal Change’: Flood Risk and Coastal Change’

Flood Defence Consent

The development runs adjacent to the culverted Moselle Brook. Under the terms of the Water Resources Act 1991, and the Thames Land Drainage Byelaws 1981, the prior consent of the Environment Agency is required for any proposed works or structures, in, under, over or within 8 metres of the top of the bank of the Moselle Brook, designated a ‘main river’.

Groundwater and Contaminated Land

We are currently operating with a significantly reduced resource in our Groundwater and Contaminated Land Team in Hertfordshire and North London Area. This has regrettably affected our ability to respond to Local Planning Authorities for some planning consultations. We are not providing specific advice on the risks to controlled waters for this site as we need to concentrate our local resources on the highest risk proposals.

We recommend however that the requirements of the National Planning Policy Framework and National Planning Policy Guidance (NPPG) are still followed. This means that all risks to groundwater and surface waters from contamination need to be identified so that appropriate remedial action can be taken. This should be additional to the risk to human health that your Environmental Health Department will be looking at.

We expect reports and Risk Assessments to be prepared in line with our ‘Groundwater protection: Principles and practice’ document (commonly referred to as GP3) and CLR11 (Model Procedures for the Management of Land Contamination).

In order to protect groundwater quality from further deterioration:

- No infiltration based sustainable drainage systems should be constructed on land affected by contamination as contaminants can remobilise and cause groundwater pollution.
- Piling or any other foundation designs using penetrative methods should not cause preferential pathways for contaminants to migrate to groundwater and cause pollution.

The applicant should refer to the following sources of information and advice in dealing with land affected by contamination, especially with respect to protection of the groundwater beneath the site:

- From www.gov.uk:
  - Groundwater Protection: Principles and Practice (August 2013)
  - Our Technical Guidance Pages, which includes links to CLR11 (Model Procedures for the Management of Land Contamination) and GPLC (Environment Agency's Guiding Principles for Land Contamination) in the 'overarching documents' section
  - Use MCERTS accredited methods for testing contaminated soils at the site

- From the National Planning Practice Guidance:
  - Land affected by contamination

- British Standards when investigating potentially contaminated sites and groundwater:
  - BS 5930: 1999+A2:2010 Code of practice for site investigations
  - BS 10175:2011 Code of practice for investigation of potentially contaminated sites
  - BS ISO 5667-22:2010 Water quality. Sampling. Guidance on the design and installation of groundwater monitoring points
  - BS ISO 5667-11:2009 Water quality. Sampling. Guidance on sampling of groundwaters

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person. The competent person would normally be expected to be a chartered member of an appropriate body (such as the Institution of Civil Engineers, Geological Society of London, Royal Institution of Chartered Surveyors, Institution of Environmental Management) and also have relevant experience of investigating contaminated sites.

If you have any further questions please contact us.

Yours sincerely

Edward Crome
Sustainable Places Planning Advisor
Telephone: 0203 263 8105
E-mail: northlondonplanning@environment-agency.gov.uk

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Date: 15 October 2015
Our ref: 166359
Your ref: HGY/2015/3000

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

FAO: Neil McClellan
Planning and Building Control,
6th Floor,
River Park House,
225 High Road,
Wood Green,
London,
N22 8HQ

BY EMAIL ONLY

Dear Mr McClellan,

Planning consultation: Proposed demolition and comprehensive phased redevelopment for stadium and other uses.
Location: White Hart Lane Stadium, Bill Nicholson Way, 748 High Road, Tottenham, N17 0AP.

Thank you for your consultation on the above dated 22 September 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

The Conservation of Habitats and Species Regulations 2010 (As amended)
Wildlife And Countryside Act 1981 (As amended)

White Hart Lane Redevelopment – No Objection
Due to the scale of development planned for this area there are many opportunities for improving the Green Infrastructure (GI) both locally and in the surrounds. Given the distance, being 1.2km to the north east of the Lee Valley Special Protection Area (SPA) and Ramsar and Walthamstow Reservoirs Site of Special Scientific Interest (SSSI) there isn't any direct or indirect impact envisaged and as such no substantial comment beyond this response will be made.

As mentioned above with GI there is a big opportunity to prepare for climate change and the inevitable changes to weather patterns that will happen as a result. The inclusion of more porous surfaces, rain gardens, green and brown roofs and walls will help absorb more of the rain and hold it in situ rather than it going straight into the drains and contributing to flooding and sewer overflows into the Thames. The benefits to the general public in health terms are also not insignificant allied to the fact that creating green corridors can allow more effective movement of wildlife and an increase in biodiversity.

Birds
Given the area in which this development is going on there could be some Black Redstart activity in the vicinity which would need to be taken into account when drawing up plans for the new stadium and its surrounds. As the nesting bird survey carried out last year identified nesting Starlings and a Kestrel nest both in active use the site has to ensure that suitable alternative habitat is included to allow these birds to continue to use the area.

Natural England is supportive of the inclusion of living roofs in all appropriate development.

Natural England is accredited to the Cabinet Office Service Excellence Standard

Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to http://livingroofs.org for a range of innovative solutions and http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf (London GLA 2008) regarding the fit with the London Plan policy.

Protected species
We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species.

You should apply our Standing Advice to this application as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

The Standing Advice should not be treated as giving any indication or providing any assurance in respect of European Protected Species (EPS) that the proposed development is unlikely to affect the EPS present on the site; nor should it be interpreted as meaning that Natural England has reached any views as to whether a licence is needed (which is the developer's responsibility) or may be granted.

If you have any specific questions on aspects that are not covered by our Standing Advice for European Protected Species or have difficulty in applying it to this application please contact us with details at consultations@naturalengland.org.uk

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Piotr Behnke on 0300 060 1963. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Piotr Behnke
Sustainable Development and Regulation
Thames Valley Team

CUSTOMER SERVICE EXCELLENCE CSE
Natural England is accredited to the Cabinet Office Service Excellence Standard

Date: 18 November 2015
Our ref: 171415
Your ref: HGY/2015/3000

planningsupport@haringey.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Ms Williamson,

Planning consultation: Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and/ or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and “scale” are reserved in relation to the sports centre building. Details of “appearance” are reserved in relation to the health centre building. The Proposal includes the demolition of 3 locally listed buildings. The proposal is EIA development. PLEASE NOTE - THIS IS A RECONSULTATION FOLLOWING THE SUBMISSION OF ADDITIONAL ENVIRONMENTAL INFORMATION.
Location: White Hart Lane Stadium, Bill Nicholson Way, 748 High Road, Tottenham, N17 0AP.

Thank you for your consultation dated and received by Natural England on 13 November 2015.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 15 October 2015.

The advice provided in our previous response applies equally to this re-consultation, although we made no objection to the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours sincerely

Tom Amos
Consultations Team

Natural England is accredited to the Cabinet Office Service Excellence Standard

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Tottenham Conservation Area Advisory Committee

Haringey Council
Planning and Regeneration
River Park House
225 High Road
Wood Green
London
N22 8HQ

13 October 2013

Dear Sir or Madam

HGY 2015/3000 – Tottenham Hotspur Stadium Proposals

We are writing to you formally to object to the above application.

The arguments set out in this letter relate chiefly to the demolition of three listed buildings in order to predominantly widen the pavement and extent of landscaping to give additional space for football supporters to assemble.

Whilst we support the scheme in principle and recognise that this will bring much needed regeneration to the area, we believe that the scale of loss to the historic streetscape is both unacceptable and unnecessary for the construction and successful future of the new stadium.

This letter makes reference to the Heritage Statement by Donald Insall Associates and the paragraph numberings we have used are theirs.

Introduction

There are some welcome points in the Heritage Statement by Donald Insall Associates but also significant points on which we differ, and therefore different conclusions that we reach. We do not believe that the Heritage Statement makes a convincing case – in summary:

- Adequate efforts have not been made to find alternative uses for the heritage assets,
- Adequate efforts have not been made to work those assets into the proposals
- We do not believe that the open space proposals for the site are good enough to warrant the loss of the heritage buildings.

We have serious concerns about the public realm space proposed to the Tottenham High Road elevation and feel that this not only does not put the new plots created to optimal use, but completely neglects to preserve and enhance the character of the local area or to make a positive contribution to the conservation area.

Tottenham High Road is one of the most pivotal historic routes into central London; it is absolutely crucial that the buildings here are preserved and cherished for future generations.

Maintaining the listed buildings would not only enhance and improve the overall quality of Spurs development, but would also soften the impact of the large industrial stadium in Tottenham's streetscape. The current juxtaposition of these charming historic buildings is fundamental in achieving this.

Tottenham and Edmonton Dispensary,
Paragraph 3.3.1: Whilst the appearance of the Dispensary (built 1910) has been recently altered by the demolition of the early 20th Century infill building previously located at the South return elevation, this *'awkward gap'* can easily be made good to avoid detracting from the beautiful and decorative brick and Portland stone façade. Using the *'awkward gap'* created by the demolition of an infill building to then try to justify the demolition of the Dispensary itself is not a rational argument and in fact completely absurd. Dispensary buildings in England are very rare and this example is both unique and exceptionally well preserved. It was designed by a local architect, H. Seymour Couchman, but is of national quality in terms of its architecture. All of the original fenestration is intact behind the current boarding.

Paragraph 3.3.2: Contrary to the report, it is an exaggeration to say that '*the building currently has no meaningful setting'*; the building makes a vast contribution to the High Road streetscape and forms an important part of Tottenham's past. Its stone entablature fascia inscribed 'Tottenham and Edmonton Dispensary' is particularly charming. Whilst the building is not currently actively used, it can easily be restored and converted to a retail/café/restaurant use to enhance the proposed stadium plans. Looking at recent precedents of large-scale developments in the London conurbation, these have all been more valuable additions when built to work synergistically with London's rich heritage and history.

The building internally: The committee of Tottenham CAAC has been unable to gain access to the building. Whilst it is noted in the heritage report by Donald Insall Associates that many significant Edwardian interior features such as mosaic tiles, decorative metal covers, chimney pieces, staircases, balustrades, cornices, dado rails, picture rails, skirting, doors remain and that some rooms are even described as being *"originally highly decorated and some evidence of the mouldings survive"*, it is a shame that the report does not include photographs to reveal the true splendour of these historic decorative and ornate features.

We are disappointed by the regrettable decision of English Heritage not to grant national listing to this building.

The Red House

Paragraph 3.4.1: The Red House, like the Dispensary was built for commercial use – it was originally a coffee house, built in 1878-1880 by a teetotal local philanthropist.

Paragraph 3.4.2: As per the Dispensary, it is an exaggeration to say that '*the building currently has no meaningful setting'*; the building makes a vast contribution to the High Road streetscape and forms an important part of Tottenham's past. Again, whilst the building is not currently actively used, it can easy be restored and put back to a class of use which will complement the stadium development.

Paragraph 3.4.4: The building still retains its original charm, even if the recess in which it originally bore its name is now 'just red brick'. One would have thought that owing to the historical links to *THFC*, there would be benefits in keeping this building. This link, which adds to the significance and value of this building, will be lost forever if the building is destroyed.

The former White Hart Public House

Paragraph 3.5.1: To claim that owing to the demolition of the adjacent terraces that this building has now *'lost its original terraced setting to the north making it appear incomplete as an architectural composition and exposing its plain northern return elevation which detracts from the character of the street'* is bold and equally irrational. This again demonstrates a complete lack of understanding of the importance of protecting the unique character of listed buildings from developments such as this.

Paragraph 3.5.2: As per the above buildings, it is an exaggeration to say that '*the building currently has no meaningful setting'* – all these buildings make an extremely positive contribution to the conservation area and would only enhance the development.

The building internally: It is noted in the report that *'original joinery and decorative architectural mouldings survive… A number of Edwardian chimney pieces also survive to the upper floors, consisting of painted timber mantels with decorative tiles to the cast-iron fireplaces'*. Again, disappointingly, no photographic record of these was included in the report.

Conclusion

In our view the applicants' most recent proposal is extremely detrimental not only to the preservation of significant historical heritage within the Borough of Haringey, but also in terms of complementing other recent significant developments in London. We consider that these listed buildings help frame the new stadium in a meaningful way and added context and scale and historical grounding. We also feel that these added balance to the High Road both from a north south and east west point of view, adding to the local conservation area. We consider that if the northern group of listed buildings could be retained, the southern group could be equally.

We strongly disagree that the club's proposals would greatly improve the setting and townscape of the area. It appears that the heritage statement is not impartial has clearly been written to fit in with the ambitions of Spurs to build the largest stadium in London. Every football team these days wants an 'icon', competing with rivals for a 'bigger' or 'better' stadium. We are confident that a new stadium can be built, whilst successfully managing crowd flow and associated egress, without the need to demolish this significant cluster of historic listed buildings. The master plan (Drawing reference POP-4494-PLN-GA-0121-00), demonstrates that there are multiple egress routes designed in scheme within the South-West corner and the comparison drawing (POP-4494-PLN-GA-0140-00) substantiates that the width between the listed buildings is in fact greater than the width of the egress route being created by their demolition. We further disagree that they lie within a poor setting or one that cannot be reconciled with the proposals. As highlighted above, recent precedents of large-scale developments in the London conurbation have been more successful when built to work synergistically with London's rich heritage and history.

We disagree that the buildings of the southern cluster are necessarily rendered meaningless and isolated in the new proposed context. Whilst it is fantastic that Warmington House is being retained, we believe that the new development would better complement Tottenham High Roads townscape if the remaining listed buildings were retained and properly absorbed into the design of the development. All of the detached buildings, presenting three storey facades to the High Road, are of a size and importance that they can stand up to a challenging context. In addition they could be linked together by the use of wrought iron work, trees, if it was sought to do so. This would not be beyond the imagination and ability of a talented Architect. One would have thought that something to this effect would be preferential for Spurs.

We would argue that the public realm area proposed in the place of the listed buildings is a damaging strategy that will not improve with time. Enough local and national examples exist of similar public spaces that do not live up to their original aspirations. One example, also by Populous, is Olympic Way, leading to Wembley Stadium. This is an insipid, empty and dark public space during non-match day, only to be filled with hot dog stands, litter, counterfeit goods and ticket touts on match day – does this really fit with the regeneration strategy for the future of Tottenham High Road?

Regeneration is something that the area needs, but this needs to be balanced, considered and not at the expense of losing some of our heritage. Once these buildings are gone, they

are gone forever, as was the case with the demolition of Fletcher House last summer. We have not only a conservation responsibility but also a social responsibility to ensure that buildings such as these are cherished for future generations to enjoy and learn from.

Yours sincerely

Matthew Bradby
Chairman of Tottenham CAAC

Alex Bowring
Conservation Adviser
Direct line 020 8747 5894
alexb@victoriansociety.org.uk

THE VICTORIAN SOCIETY
The champion for Victorian and Edwardian architecture

Emma Williamson
Planning
Haringey
River Park House
225 High Road
Wood Green
London
N22 8HQ

planningsupport@haringey.gov.uk

Your reference: HGY/2015/3000
Our reference: 2015/10/018

19 October 2015

Dear Sir/Madam

RE: Proposed demolition of and comprehensive phased development for stadium, including the demolition of 3 locally listed buildings.

Thank you for consulting the Victorian Society on this application. We strongly **object** to the revised proposals concerning Tottenham Hotspur's new stadium, which now includes the demolition of three locally listed buildings on High Road.

We are supportive of the exciting new development in Tottenham, and we are appreciative that the applicant has kept us well informed throughout the development process. We are however dismayed to see that the demolition of 746-750 High Road is once again proposed. The Society, along with SAVE, opposed the demolition of the three buildings in 2010, and the subsequent revision of the scheme was welcomed. Most of the buildings this side of the High Road have already been demolished to make way for the stadium; the three locally listed buildings were supposed to be retained because they are worthy of retention, and are recognized as such. The current application is therefore now little different to the strongly opposed initial planning application in terms of its destructiveness and consent should therefore be refused on the same grounds.

The Tottenham & Edmonton Dispensary, the Red House and the White Hart Pub make an important contribution to the streetscape, the history of the area and indeed the history of the football club. These qualities have long been championed by other conservation groups such as the Tottenham Civic Society, and we support the comments made by Matthew Bradby on 13th October from the Tottenham CAAC.

Dispensaries are a quintessential feature of Victorian and Edwardian streetscapes, having an important presence in towns fortunate enough to be provided with one. Without a comprehensive study of this building type available, it is not possible to understand the extent to which the loss of such a building would be regretted – particularly when it is such an accomplished design as this one. They are incredibly important in illustrating the administration of health care before the creation of the NHS. The Red House was originally a coffee house or temperance inn, and has had

Patron
HRH The Duke of Gloucester KG, GCVO
President
The Lord Briggs
Chair
Professor Hilary Grainger

Vice Presidents
Sir David Cannadine
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strong links to the football club as the offices of Bill Nicholson (1919-2004), regarded by many as Spurs' greatest ever manager. Finally, the White Hart Pub, which if retained would represent the last remaining fragment of the stadium development that Spurs undertook from 1899, when the pub was built in anticipation of the massive increase in footfall. The establishment was opened by the brewers Charrington, who leased the land upon which White Hart Lane was built on. With both buildings so in integral to the club's past, their demolition is therefore a curious aim. Spurs wouldn't want to end up a club with no history.

Furthermore, it is impossible that their demolition will enhance the character of the Conservation Area as suggested. The High Road Historic Corridor Character Appraisal (March, 2009) refers to the red and yellow stock brick buildings which make up the general identity of the area; 746-750 being some of the best examples of this trend, and are locally listed for their architectural and historic interest. It must be remembered that the Conservation Area was designated to preserve the character of the High Road, and therefore buildings which make a positive contribution to it. The current planning application could only be considered a detractor to the Conservation Area, in that the proposed demolition obviously disrupts the prevailing street pattern. It would also be difficult to suggest that the new stadium is in keeping with the scale and character of the area. Retaining and refurbishing the locally listed buildings would represent an enhancement of the Conservation Area, which is a requisite of the NPPF, and would go some way in mitigating the dramatic impact the new stadium will have on many other heritage assets.

The importance of the urban context to an urban football stadium has been brought to light before. Without the historic townscape, the stadium might as well be a suburban destination with no links to the Tottenham community whatsoever. The new complex should be visually rooted to the area, not at odds with it. Failure to integrate with the historic setting would be a failure for the scheme; an oversight in design that could only be regretted. The dispensary, house and pub have been present for over a hundred years, and are likely to outlast the new stadium as pieces of celebrated architecture. Therefore, it would do well to cause as little impact on the area as possible, and politely integrate with elements of the built environment that are already appreciated, rather than ousting them. To plan such a large intervention as though it is designed on a blank canvass is careless and unsophisticated – the area deserves better.

A strident stadium design has been chosen which is intentionally unsympathetic to this end. Presumably the real reason why the demolition of 746-50 High Road is sought is to allow the new stadium to be more visually prominent. The advice on crowd safety is there to give this desire more legitimacy. If crowd safety is as serious an issue as implied, then it would have been one of the first considerations to have been worked out in the initial planning, not a worryingly late afterthought as it is here. The telling options appraisal is presented as though they are the only options and this is the only one of twelve that is any way viable. If a space as continuously wide as 9.5m is sought (the width of the pavement in the Populous scheme), then this should be achieved in the space or 'canyon' between 746-750 High Road and the new stadium. A width greater than this is actually provided by most of the area behind the retained locally listed buildings in the consented scheme. It is also not clear that the Populous scheme presents a pavement wide enough to discourage anyone from walking on the road either. Surely this is inevitable if the principal thoroughfare is the pavement and therefore safety gains are limited.

A minor change to the consented scheme could be to prohibit access to these buildings as food outlets (or otherwise hitherto unexplored uses) from the street on match days and allow entrance only from the rear. This would also serve to discourage fans from using the pavement. The concept of 'desire lines' is used as a justification as though it is a forgone conclusion when it is by nature unpredictable. Fans will be arriving at an almost unrecognizable site. Appropriate signage, barriers

and policing, which would be present on match days anyway, would surely prevent the foreseen charge up the High Road.

In short, we believe that the retention of these three buildings need not and should not prevent the construction of the new stadium from going ahead. We are not placing the preservation of heritage above human safety; both of these can and should be achievable with feasible alternatives. There is absolutely no reason why these historically important buildings cannot be incorporated in the realisation of the proposed stadium design. Only this would represent an enhancement of the Conservation Area's character. It should be an aspect of the new design which is ceded, which is surely not so difficult a solution given that the new stadium does not yet exist. This would be fairer than razing the irreplaceable heritage assets.

We therefore recommend that consent for this application is **refused**. I would be grateful if you could inform me of your decision in due course.

Yours sincerely

Alex Bowring
Conservation Adviser

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Cordell Paul

From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2015/3000 Site Address: Tottenham Hotspur Football Club 748 High Road London N17 0AP London Comments by: Our Tottenham

Submission: Objection
Comments: Comments on Application HGY/2015/3000 located at Tottenham Hotspur Football Club 748 High Road, London, N17 0AP

Submission on behalf of the Local Economy Group of the Our Tottenham network.

The Our Tottenham network brings together 40 key local community groups, projects and campaigns standing up for the interests of people in Tottenham, especially around planning and regeneration issues (http://ourtottenham.org.uk/?page_id=31). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. This response, formulated by the Local Economy Group, is based on the principles embedded in the Community Charter for Tottenham agreed by the Our Tottenham network on 6 April 2013 (available here: http://ourtottenham.wordpress.com/community-charter/). This was followed up by a Community Planning for Tottenham conference in February 2014.

History of stadium-led regeneration schemes

The history of stadium-led regeneration schemes is older in the USA and consequently there is a much deeper evidence base of the claimed benefits for such projects.

The issue of stadium development has become centred on whether the claimed economic benefits flow from state subsidies provided to sports franchises through the building of new sports stadiums. Numerous researchers have examined the relationship between new facilities and economic growth in metropolitan areas in the USA, see: Baade & Dye, 1990; Rosentraub & Swindell, 1993; 1996, Noll & Zimbalist, 1997 . In each case, independent analysis of economic impacts made by newly built stadiums and arenas has uniformly found no statistically significant positive correlation between sport facility construction and economic development (Siegfried & Zimbalist, 2000) . This can be contrasted with the claims of teams and leagues, who emphasize the large economic benefits of professional franchises merit significant public expenditures on stadiums and arenas, (Matheson, 2002) .

The OT Network believes that the ¿stadium-led regeneration¿ does not deliver broad community benefit or that the larger stadium will enable it to ¿host a wide range of community activities¿. There has not been any genuine participation with local stakeholders to promote and develop sporting facilities.

In general terms the aim enshrined in the approach to planning in Tottenham - by the London Plan, the Upper Lee Valley Opportunity Area Planning Framework and the Area Action Plans for Tottenham that Haringey Council has recently consulted on - of attracting new investments, new residents, new businesses and new development to Tottenham should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents (by creating jobs which locals can access and developments which generate true and significant benefits or facilities accessible to the community).

We wish to draw attention to the way in which existing businesses lying within the development areas in North Tottenham, including the area around the proposed new stadium have been ignored and dismissed by local plans and development proposals. We fully support the work of the Tottenham Business Group to try to redress this.

Plans drawn up by Arup, linked to the Tottenham stadium development in High Road West, involve the displacement of existing businesses and social housing. Options which could have prevented the displacement of existing businesses were presented by the developer Arup, but rejected by Haringey Council. Plans for the High Road West Scheme in Tottenham would demolish the existing Peacock Industrial Estate that contains numerous small and medium business enterprises.

We strongly recommend the following:

1. That commitments to work with existing residents and businesses by the Mayor and the local authorities are strengthened to prevent damaging outcomes.

For example, in Tottenham, over 2000 jobs have already been lost with the demolition of large industrial estates in Northumberland Park. Plans for the High Road West Scheme in Tottenham would demolish an existing industrial estate, described by the Tottenham Business Group in their response to the Tottenham Area Action Plans (AAPs) consultation as ¿one of London¿s workshops¿, resulting in the loss of 200 jobs, as well as ¿the loss of manufacturing and industrial units that could provide valuable skilled training and apprenticeships for our local youth¿. In this instance, the planning framework associated with this ¿stadium-led regeneration¿ seems to offer insufficient protections for existing employment land, risking its destruction through developments that do not recognise or value existing economic activities. In relation to High Road West, the Tottenham Business Group point out that ¿The jobs, the training and the varied established units of Peacock Estate and its surroundings could not be replaced elsewhere. Such proposals as part of ¿stadium-led regeneration¿ do not ¿deliver a genuine regeneration legacy for local communities¿.

2. That the Mayor and local authorities prevent the loss of existing community assets. These would include public houses, libraries, markets, community centres, etc, which also fulfill social and economic roles.

3. That strong contractually obliged claw-back provisions are inserted in to any agreements with private companies over public money put in to ¿stadium-led regeneration¿ schemes if the stadium, football club or any associated company is sold.

4. That the Mayor follows the recommendation of the previous GLA study on London football stadiums to ensure that football clubs adopt an open book policy with the local and regional planning authority throughout an application.

5. Due to the massive impact stadia development has on the local surrounding communities, and the wealth of modern clubs (especially those in the top divisions), ensure that the maximum ¿planning gain¿ agreements are secured for the benefit of the existing communities.

6. A series of pre-requisites to developing stadia for the benefit of communities and football clubs were put forward by Brown et al. in their 2006 report for the Football Foundation. It was stressed that football clubs need to minimize the negative effects of events at the stadium on local communities. As a minimum, clubs need to have in place means of regular consultation, problem solving and decision making to overcome difficulties suffered by local residents. These could include:

- Local steering groups, incorporating club, local authority, residents representatives, local business groups, agencies (such as transport).
- An active and meaningful involvement in decision making by local community representatives and other residents and businesses ¿ as well as supporter communities - facilitated by the football club and local authorities

- Developments designed with local communities to meet their needs, as well as other parties such as clubs.
- Regular and accurate information sharing about developments, plans and options.
- Independent monitoring of community involvement in developments.
- Regular open/public consultation meetings.
- Stadium open days
- A defined member of staff able to tackle issues for local residents across different departments of the club.
- Outreach work, especially on match days, to observe and to make connections with local people.
- Schemes for the removal of litter.

Where football facilities are developed as part of local regeneration strategies, it must be ensured that they are accessible and useful to local people. A Community Involvement Plan could help achieve this, so long as it:

- Takes full account of what local people need, involving them in the planning and negotiations for the site.
- Ensures that playing and business requirements are balanced with the need to maintain fluid and open access to the stadium.

If distinctions between fan and resident communities were more effectively bridged, clubs and their stadia may be able to become more embedded locally. Thus participation in the decision-making process surrounding new stadia is simply the very important starting point of this process.

Support for the recommendations from the London Assembly

These recommendations are supported by the investigation and findings of the London Assembly, published in March 2015 in The Regeneration Game, as detailed below.

Executive Summary
If place-making is to happen, lessons from east Manchester, Wembley and The Emirates make it clear that new stadia must not occupy large land areas ¿ attracting growing match day crowds and swelling shareholder profits ¿ at the expense of the communities that host them. Feedback to our local survey shows that communities are not always opposed to stadium development. However, effective early involvement and consultation is necessary to broker stronger relations between clubs and communities.

Football clubs have a responsibility to ensure that the local community gains from a new stadium. Communities must benefit from new mixed tenure housing, and improved transport links and connections across the area. Local authorities must also capitalise on opportunities to guarantee that clubs and other incoming businesses prioritise the local workforce when sourcing new employees.
Building in these features will shift stadium-led regeneration proposals from producing limited local effects, to supporting strategic impact across the London Plan policies. That is why the Mayor should support our Stadium Charter and push for the planning framework to treat stadium applications as strategic developments.

What difference can a stadium make?

2.18. Some of the completed schemes we examined made a valuable contribution to local affordable housing. In its section 106 agreement with Arsenal FC, for example, Islington Council secured almost 50 per cent affordable housing, across approximately 3,000 new or refurbished homes delivered through the scheme.29 Around Wembley Stadium, 45 per cent of the first phase of housing by developer Quintain is affordable, along with 70 per cent planned in the second phase.30

Enhancing opportunities to benefit local communities 2.19. The evidence also warns of a number of risks, and the measures clubs and local authorities could take to reduce them.

Supporting local businesses
2.20. Not everyone may welcome new economic development around a new or expanded stadium. Some community groups argued that big business interests ¿ both football clubs themselves and the chains they may attract ¿ will squeeze out local, independent businesses. Tottenham Business Group explained the concerns of some local traders:

¿The majority of businesses are freeholders often living above their premises. We have been given no other recourse but to go [...] The High Street shops are derided as low value businesses, yet the 'chicken shop' run by one of the local businessmen is one of the most popular eateries on the High Road.¿31 2.21. Local authorities can work with football clubs to ensure that this does not happen and that locally-owned businesses benefit from stadium-led regeneration. Speaking to some traders near The Emirates, we heard that few had benefitted from any stadium ¿spill over¿ effects. In their view, food and beverage outlets in the stadium¿s immediate vicinity had gained most. Transport changes, such as removing ticket barriers at Finsbury Park ¿ while a safe and useful adaptation for match days ¿ increased problems such as drug dealing and black market trading the rest of the time, which could have a negative effect on businesses trying to trade all week.

Local people must benefit from new employment 2.22. Football clubs have a clear opportunity to address concerns around low-wage jobs. This is especially important when considering stadium-led regeneration because, as Mark Panton highlighted, ¿[stadium-led] regeneration schemes might bias local development towards low-wage jobs related jobs¿.32 The Premier League recently announced the value of its TV rights had risen by 70 per cent, yet media reports suggest that none of its clubs ¿ except Chelsea FC ¿ pay their employees the Living Wage.33 The LLDC reassured us that long-term operational jobs will be delivered at the Olympic Stadium: for example, security, stewards, catering, ticket sales. We welcome the agreement the E20 partnership will have with the future stadium operator, requiring the operator to use Newham Council¿s employment brokerage service (Workplace), and to pay staff the London Living Wage.34 London¿s Premier League clubs should take the opportunity to show leadership by committing to paying their staff the London Living Wage.

Recommendation 1
In the next iteration of the London Plan, the Mayor should incorporate a Charter for stadium developments as part of amendments to the Plan. In the intervening period, the Mayor should have regard to the Charter when reviewing stadium planning applications. Local authorities should have regard to the stadium Charter in their Local Plans.

Charter for effective stadium-led regeneration Football clubs and relevant local authorities seeking to develop a stadium-led regeneration scheme should commit to:

¿ A clear vision and policies for place-making around the new (or expanded) stadium, including public transport connectivity and permeability between the stadium and surrounding area.

¿ Undertake a skills mapping exercise to assess local capacity to take advantage of new jobs. The results should inform a skills and employment strategy, including measures to prepare and upskill local communities in order that they can access the new jobs.

¿ Pay the London Living Wage to all stadium employees.

¿ Support the Mayor¿s housing targets in all stadium-led regeneration schemes, where practical. Any new housing developed as part of, or around, a new stadium, should aim to be mixed tenure, to include both family and social rented affordable housing.

¿ Demonstrate how they have consulted with a diverse range of local community and stakeholder groups to:
¿ identify effective uses of the stadium scheme as a community asset; ¿ communicate what social infrastructure will be provided; and ¿ establish an ongoing relationship with the community.

In addition, in cases of a stadium financed or part-financed with public funds, the Mayor should:
¿ Require a community forum to be set up to involve the public and communities in a football stadium before the new venue is built. This would give communities a say on how the stadium is used, and what social infrastructure is provided.

The Our Tottenham network includes (July 2014):
Bull Lane Playing Fields Campaign / Weir Hall Action Group, Chestnuts Community Centre, Clyde Area Residents Association, Day-Mer, Defend Haringey Health Services, Dissident Sound Industry Studios, Find Your Voice, Friends of Downhills Park, Friends of Lordship Rec, Growing-In-Haringey network, Haringey Alliance for Public Services, Haringey Defend Council Housing, Haringey Federation of Residents Associations, Haringey Friends of Parks Forum, Haringey Green Party, Haringey Housing Action Group, Haringey Independent Cinema, Haringey Justice for Palestinians, Haringey Left Unity, Haringey Living Streets, Haringey Needs St Ann's Hospital, Haringey Private Tenants Action Group, Haringey Solidarity Group, Haringey Trades Union Council, Living Under One Sun, Lord Morrison Hall / Afro International, N. London Community House, Peoples World Carnival Band, Selby Centre, The Banc, Tottenham and Wood

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TOTTENHAM CONSERVATION

Haringey Council
Planning Team
River Park House
Wood Green N22 8HQ

15 October 2015

c/o Neil McClellan

Dear Neil

OBJECTION - Tottenham Hotspur Stadium Proposal : HGY2015/3000

Please may I formally submit to Haringey Council my objections to the proposed demolition of three Tottenham iconic listed buildings, The Red House – White Hart Pub and Tottenham and Edmonton Dispensary. These buildings coupled with nearby Warmington house are a quartet and reminder of the growth of Tottenham over the last 150 years and the service that they have provided for the community.

The buildings are locally listed and are part of the North Tottenham High Road Conservation area.

I have highlighted below the reasons why these buildings are loved and respected by the community. Therefore they should be reused and not demolished.

The Red House Coffee Palace
One of Tottenham great benefactors Joshua Pedley provided this building in 1877. It was to be used for the sale of non-intoxidents and to reduce the usage of public houses by the people. This building was a gift to the people of Tottenham. Interesting that THFC did not move to this site till 1899, thus the building was here some 22 years before.

Tottenham Hotspurs however purchased this building in 1922, and it has been under their guidance now for 93 years. This building has housed the early management board in its time. It is therefore some surprise that THFC architects Insall Associates state "the building currently has no meaningful setting" **This building still has lots to offer and can continue to be used for Spurs ventures or community usage.**

White Hart Pub
This pub owes its name to the original White Hart on the corner of White Hart Lane. When the present pub was built outside the present ground c 1866 its licence was transferred from the closed original. Hence the spurs "address" as White Hart Lane. This pub is important to the folklore of THFC. The premises has been in limbo and in ownership of THFC for some years. **This building still has lots to offer and can be used for Spurs ventures or community usage.**

Tottenham and Edmonton Dispensary
The original building was a charity set up, which opened its doors to the public on 1 August 1864. It was formed by local Tottenham people, whom endeavoured to provide a surgery and consulting rooms for the treatment of illness. The community from Tottenham and Edmonton were catered for. The new confident build was 1910.

It is pure nonsense from THFC to state that "the building currently has no meaningful setting" .This building is still a standout and welcome feature of this part of Tottenham High Road. **This building still has lots to offer and can be used for Spurs ventures or community usage.**

Retention Summary
It is very disquieting to hear from THFC architects that the three important buildings should be demolished just for the setting up of access routes at this site. This is indeed over the top. The retention of Warmington House, another historic building is warmly applauded, but it must be recorded that in1984, THFC wished to demolish this building as well.

I believe that exit / access routes could easily be managed by moveable barriers and stewards on Matchdays. Bus routes and vehicle movement are not allowed between certain time scales on match days. This coupled with the fact that there has never been evidence or a recorded accident around this area, suggests that current health practices must be working fine.

It is important to note that THFC only have around 25/30 home games a year. It is therefore a drastic decision to demolish these fine buildings on this count.

The 1984 Application
THFC submitted a demolition application for the 4 listed buildings in 1984. This received strong objections from the **Community**, **English Heritage** and **Haringey Council's planning committee, who stated at the time, that the listed buildings on this site should be integrated into any new build in the future.**

This is still the view of the Tottenham community who care about the their High Road and the protection of its buildings.

I therefore submit my objections to the loss of the three named buildings. I trust this will be supported by Haringey Council, English Heritage and the Community.

Yours sincerely

Chris Lane
Tottenham Conservation
9 Prospect Place
Tottenham, N17 8 AT

Cordell Paul

From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2015/3000 Site Address: Tottenham Hotspur Football Club 748 High Road London N17 0AP London Comments by: Tottenham Business Group From:

℅ 755
High Road
Tottenham

N17 8AH

Submission: Objection
Comments: 10 October 2015

FAO planning Officer Neil McClellan

Dear Sir

Reference Application number HGY/2015/3000

I write as Vice Chair for the Tottenham Business Group, a group of local viable businesses whose are greatly impacted and will effectively be blighted by the above application. I wish to object strongly to the proposals contained within this new application.

We strongly object to the demolition of further listed buildings from the Historic Tottenham High Road. The High Road is an historic and valued conservation area. It has lost sufficient listed buildings to the new stadium project. The destruction of three further listed buildings cannot be upheld for the purpose of giving THFC a sleek new Southern Terrace.
We understand one of the justifications put forward for the demolitions was that these listed buildings under the new application would create an unsafe pinch point along the pavement.
We do not see the credibility in this argument as the increased size of the new stadium itself with its curved edge on the pavement creates a huge pinch point with no possibility of manoeuvre.

Rudolphs, formerly The White Hart is described as better demolished because the building has lost its setting. Since the setting was lost due to the initial demolitions for this project we feel it incumbent upon Spurs to restore a proper setting and ensure this building is not lost to the community.
Additionally the demolition of these buildings cannot be considered in isolation from the proposals for High Road West whose current plan proposes further demolition of a major part the conservation area.
This application predetermines its future because this application can only seen in context if the demolition of a huge section of the conservation area opposite the proposed new stadium goes ahead. That means the major demolition of the west side of the High Road from Coombes Croft library across two parades of original shops.

We object to the new proposed development because overbearing, out of scale and out of character with a redbrick Heritage High Road. The shiny glass and concrete stadium facility is now 10 stories high and further forward than that previously proposed. It dwarfs and is out of context with the redbrick grade 2 buildings of the High Road.

The proposal to restore and place a grade 2 building in a modern terrace on the Southern approach is an act of pure vandalism

We object strongly also to the loss of light and overshadowing that the businesses on the established High Road will sustain. The images contained within this application are misleading as to the true height of the newly proposed hotel and residential blocks. The hotel has 23 stories but the residential blocks are higher. The new blocks will all dwarf the new stadium itself with heights ranging from 80 to over 120 metres. The proposed Tower B will be approximately half the height of the Shard.
The surrounding local businesses have an established right to light. The blight on their premises cannot be disregarded

We object to the strain these new proposals will put on parking, loading, and turning under the pressure of vastly increased traffic. The adequacy of provision for parking and loading and traffic generation were never identified as adequately met by the previous application.
No consideration has been given to the needs of businesses opposite and also along Park Lane (who will find themselves opposite vast loading bays). The blight on their businesses would be ongoing.
We view these new proposals as unsustainable without quantifying and adequately meeting their projected effect on the present infrastructure.

We would also draw your attention to the conclusions of the Tottenham Future¿s Consultation, which should be considered alongside this new application. The new stadium project cannot claim to be at the centre of the North Tottenham regeneration and not consider the views of its community.

Patricia Pearcy
Vice Chair
For and behalf of the
Tottenham Business Group

Neil McClellan
Case officer
Haringey Borough Council
River Park House
225 High Road
Wood Green
London
N22 8HQ

Neil.McClellan@haringey.gov.uk
By email

SAVE BRITAIN'S HERITAGE
70 Cowcross Street, London EC1M 6EJ

20 November 2015

Dear Mr McClellan,

Planning application: HGY/2015/3000 - Proposed demolition and comprehensive phased redevelopment for stadium with hotel, Tottenham Experience, sports centre; community and/or offices; housing; and health centre; together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works.

SAVE Britain's Heritage writes to **strongly object** to this application, which would result in the demolition of 746-750 High Road, three locally listed buildings within the North Tottenham Conservation Area.

It is with great disappointment that we are once again faced with an application that proposes to demolish these three buildings. SAVE led a campaign against similar demolition proposals in 2009-2010, commissioning architect Huw Thomas to produce an alternative scheme showing how these three buildings could be retained. We subsequently entered into negotiations with Tottenham Hotspur Football Club, leading to a redesign which accommodated these buildings as part of the stadium rebuilding and expansion. This revised scheme received planning permission in September 2011, and remains valid.

Since it has been demonstrated that these buildings can be retained as part of the stadium expansion we consider there is no justification for their demolition, and request that planning permission be **refused**. We note that strong objections have been received from

the Victorian Society and the Tottenham Conservation Area Advisory Committee, and our letter supports these objections.

The site & its buildings

The site in question covers almost 9 hectares, but our comments in this letter relate solely to the four buildings on the south west corner of the site, fronting the High Road. These are Valentino's public house and nightclub (formerly the White Hart public house), the Red House, and the former Tottenham Dispensary, each locally listed, and the Grade II listed Warmington House. The latter is to be retained and restored as part of this application.

All four are located within the North Tottenham Conservation Area, sub area 4, and are noted for their architectural and historic interest and for the contribution they make to the streetscape. The Conservation Area Appraisal describes each building in detail, and they warrant a short description in Pevsner.

SAVE visited the site on 12 August 2015 to get a better understanding of the buildings and their settings. Taking each building in turn, Valentino's is a late nineteenth century public house with attractive decorative features including mullioned windows, double gables, and granite pilasters. Its establishment directly relates to the growth of the football club, with the club renting land for its first pitch from the brewery, and this marks a long history of association with Tottenham; players and managers were known to frequent Valentinos, and there are instances of silverware being brought into the pub following successful campaigns.

The Red House dates from the late 1870s and is a handsome Queen Anne building of three storeys with pitched gable ends and oriel windows. It was originally a coffee house built as part of the temperance movement, but from the 1920s it became part of the football club and used for offices. Bill Nicholson, one of the most important figures in the club's history, is but one previous occupant of the building.

The former Tottenham and Edmonton Dispensary is a particularly interesting building of 1910. In red brick with Portland stone dressings, it features an Ionic doorway beneath an inscribed stone entablature, with dentilled cornicing, window surrounds and tall chimneys, creating a well proportioned and aesthetically pleasing building. Its use as a dispensary provides further historical interest for its role in the administering of healthcare before the creation of the NHS.

Finally, Warmington House dates from 1828, and is an important survival of the type of house that once lined Tottenham High Road. Built in stock brick, it has a rusticated stuccoed ground floor, window pediments, and internally retains its original plan form. It was listed Grade II in 1974.

All of the buildings are in a reasonable condition and could be restored and adapted for new uses. They were until recently still in use. They all make a positive contribution to their surroundings and the wider Conservation Area, and all efforts should be applied to retaining them. On these points we disagree with the applicant's heritage statement, which we consider to be overly dismissive of the quality of the buildings, overstating minor points such as later additions and their current condition.

The applicant is equally dismissive about the buildings' group value and their contribution to the Conservation Area. The Conservation Area Appraisal notes that two of the predominant characteristics of the area are the use of red and yellow stock brick, and that buildings front directly onto the High Road creating a sense of enclosure. These four buildings are noted as being some of the best examples of these characteristics, and it is clear they contribute positively.

Taken together, the buildings have considerable group value. This point is particularly noticeable looking down Bill Nicholson Way, with two of the buildings framing the view of St Francis de Sales church on the opposite side of the High Road, and also when looking north on the High Road. Their loss to the Conservation Area would be substantial.

The presumption within a Conservation Area is to refuse applications which seek demolition of buildings which contribute positively to the area. It is clear that these three buildings do, and their loss would cause great harm. This harm would also extend to the Grade II listed building, which would lose its context. Their retention and reuse, by contrast, would enhance the Conservation Area and, as the Victorian Society point out, go some way towards mitigating the dramatic impact the new stadium design will have.

It has become increasingly common that football clubs, as a result of comprehensive stadium redevelopments, now find themselves alienated from their surroundings and their history. Particularly bad examples from the Premiership include Stoke's Britannia Stadium, Swansea's Liberty Stadium, Norwich's Carrow Road, and to a lesser extent Manchester City's Etihad Stadium, which is mitigated somewhat by a high quality stadium design. Tottenham's desire to remain on its historic site is to be welcomed, but this need not come at the expense of surrounding historic buildings.

Many examples exist where football clubs have enhanced surrounding buildings, strengthening the bond between the club, its fans, and the local and wider community. Perhaps the best example in the context of this application is Aston Villa's Holte Hotel, a Grade B locally listed Victorian building which the football club applied to demolish as part of a proposed stadium redevelopment. Planning permission was refused, and instead the club restored and reopened the hotel in 2006 as an events space. It is now a much loved venue for fans of the football club, well used on match days and available for hire at other times. We would encourage Tottenham to adopt a similar approach with regard these three locally listed buildings.

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Registered Charity 269129

Crowd Safety

We note the applicant has submitted a document on crowd safety as justification for demolition. Whilst public safety should be a primary concern, we do not agree that demolition is the only way to facilitate this. As pointed out in the Victorian Society's letter one solution is to utilise the canyon between 746-750 High Road and the proposed stadium, a feature of the consented scheme. Alternatively restrictions on how the buildings are used on match days, and the location of their entrances, is another possible solution for addressing crowd safety issues.

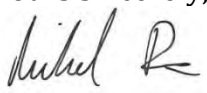
Conclusion

SAVE has had a long term interest in this site, and we are committed to ensuring the best possible solution is achieved. We therefore request that this application be **refused** planning permission so as to facilitate the retention of these three buildings as part of the wider development. Were this to happen we would withdraw our objection. This is not a case of having one or the other – a new stadium and associated facilities can be achieved whilst retaining, reusing and enhancing these locally listed buildings. Indeed the applicant has already demonstrated that it is possible and achieved planning permission for such a scheme.

Should this scheme be approved we consider that there are strong grounds for it to be called in for full public inquiry, and we would push for this to happen. Additionally, SAVE would consider a judicial review of this proposal if planning permission is granted.

I would be grateful if you could inform me of the decision of the planning committee in due course.

Yours sincerely,



Mike Fox
Caseworker

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Registered Charity 269129

APPENDIX 24a

Conditions in Reference to the Full Planning Application HGY/2015/3000

The conditions that relate to individual buildings are split between the various plots that form the planning application development. The plots comprise the following development:

- PLOT 1 The Stadium
- PLOT 2 The Tottenham Experience (including Warmington House)
- PLOT 3 The Hotel
- PLOT 4 The Extreme Sports Building
- PLOT 5 The Residential and Flexible B1 / D1 Space
- PLOT 6 The Community Health Building

Other than those conditions in Section A below the subsequent conditions in each Section B to H shall only be enforceable against the Plot to which they relate.

A. CONDITIONS RELATING TO THE WHOLE SITE	
Condition Ref.	Description
A1	**Implementation Timescales – Full** The part of the development where details are approved by this planning application, namely "Plot 1" and "Plot 2" shall begin as follows: a. The Plot 1 development shall commence within five years of the date of this planning permission; and b. The Plot 2 development shall commence within seven years of the date of this planning permission. Reason: This condition is imposed by virtue of the provisions of the Planning & Compulsory Purchase Act 2004 and to prevent the accumulation of unimplemented planning permissions.
A2	**Reserved Matters** Development shall not be commenced on each Plot submitted in OUTLINE, namely "the Extreme Sports building", "the Residential" and "the Community Health Centre" until the Council has approved the following reserved matters in respect of each Plot: a. Plot 4: The Extreme Sports Building – (i) appearance and (ii) scale; b. Plot 5: The Residential and Flexible B1/D1 Space – (i)

	appearance and (ii) landscape; and c. Plot 6: The Community Health Building – (i) appearance. Reason: In order to comply with Article 2 of the Town and Country Planning (Applications) Regulations 1988 (as amended) which requires the submission to, and approval by, the Local Planning Authority of reserved matters.
A3	**Indicative Phasing Plan** All development shall accord with the phases identified in the Indicative Phasing Plan unless otherwise agreed. REASON: To secure the programming and phasing of, and an orderly pattern to the development.
A4	**Consented drawings and documents** The development shall be constructed in accordance with the following drawings and details submitted with the application. Full List of drawings, parameter plans and documents including Design Code set out in Appendix. Reason: In order to avoid doubt and in the interests of good planning.
A5	**Business and Community Liaison construction Group** For the duration of the construction phase of development the Applicant will establish and maintain a Liaison Group having the purpose of: a) informing local residents and businesses of the design and development proposals; b) informing local residents and businesses of progress of pre-construction and construction activities; c) considering methods of working such as hours and site traffic; d) providing local residents and businesses with an initial contact for information relating to the development and for comments or complaints regarding the development with the view of resolving any concerns that might arise; e) producing a leaflet prior to commencement of demolition for distribution to local residents and businesses identifying progress of the Development and which shall include an invitation to register an interest in the Liaison Group; f) providing advanced notice of exceptional works or deliveries; g) providing telephone contacts for resident's advice and concerns. The Liaison Group will meet at least once every month with the first meeting taking place one month prior to Implementation and the meetings shall become bi-monthly

<table>
<tr><td></td><td>after the expiry of a period of four (4) months thereafter or at such longer period as the Liaison Group shall agree.

Reason: In order to ensure satisfactory communication with residents, businesses and local stakeholders throughout the construction of the development.</td></tr>
<tr><td>A6</td><td>Conformity with Environmental Statement
The development is to be constructed in accordance with the standards etc set out in the ES.

Reason: To ensure the development complies with the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 as amended and that it has an acceptable impact on the environment.</td></tr>
<tr><td>A7</td><td>Maximum quantum / density
The total quantum of built floorspace across the development shall not exceed the following:

<table>
<tr><th>Land Use</th><th>Use Class</th><th>Area GIA (sqm)</th><th>Units</th></tr>
<tr><td>Leisure (including stadium)</td><td>D2</td><td>122,000</td><td>n/a</td></tr>
<tr><td>Residential</td><td>C3</td><td>49,000</td><td>585 (max)</td></tr>
<tr><td>Sui Generis / Tottenham Experience</td><td>Sui Generis</td><td>4,311</td><td>n/a</td></tr>
<tr><td>Business</td><td>B1</td><td>4,000 (max)</td><td>n/a</td></tr>
<tr><td>Community and Culture</td><td>D1</td><td>4,000 (max)</td><td>n/a</td></tr>
</table>

Reason: In order to avoid doubt and in the interests of good planning.</td></tr>
<tr><td>A8</td><td>Materials
Full details of the development, including samples of all materials to be used for the external surfaces of each phase of the development as set out in the agreed phasing plan included in the section 106 agreement shall be submitted to, and approved in writing by, the Council prior to the relevant material being installed into the relevant phase of development. Samples shall include sample panels, glazing and a roofing material sample combined with a schedule of the exact product references.

Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.</td></tr>
<tr><td>A9</td><td>Materials Boards
All approved materials for each Plot shall be erected in the</td></tr>
</table>

	form of a samples board to be retained on the site of each Plot throughout the works period for the Plot concerned and the relevant parts of the works shall not be carried out otherwise than in accordance with the approved details. Reason: In order for the Local Planning Authority to retain control over the exact materials to be used for the proposed development and to assess the suitability of the samples submitted in the interests of visual amenity consistent with Policy 7.6 of the London Plan 2015, Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
A10	**Flood Risk Management** The development shall only be carried out in accordance with the approved Flood Risk Assessment (FRA). Reason: To promote a sustainable development consistent with Policies SP0, SP4 and SP6 of the Haringey Local Plan 2013.
A11	**Drainage** The development to be carried out in accordance with the Drainage Strategy and the details for the drainage of each Plot to be submitted to and approved by the Council in advance of commencement of development for that phase. Reason: To promote a sustainable development consistent with Policies SP0, SP4 and SP6 of the Haringey Local Plan 2013.
A12	**Interim Landscape and Meanwhile Uses** Prior to the commencement of construction of the stadium super structure an Interim Landscape and Meanwhile Use scheme to be submitted and approved by the Council. The development shall carried out in accordance with the approved Interim Landscape and Meanwhile Use scheme and reviewed prior to the commencement of development of each Plot. Reason: In order to provide a suitable setting for the proposed development in the interests of visual amenity consistent with Policy 7.21 of the London Plan 2015, Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
A13	**Plant Noise** No plant or machinery in operation shall omit noise that exceeds the maximum noise levels set out in Table 13.19 of the Environmental Statement September 2015 (noise levels to be confirmed). Reason: In order to protect the amenities of nearby residential occupiers consistent with Policy 7.15 of the London Plan 2015 and Saved Policy UD3 of the Haringey Unitary Development

	Plan 2006.
A14	**Plant and Machinery** All plant and machinery shall meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM and all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW shall be registered at http://nrmm.london/. Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA Non Road Mobile Machinery (NRMM) Low Emission Zone.
A15	**Demolition of Locally Listed Buildings** No demolition of the existing three locally listed buildings (746, 748 & 750 High Road) until the applicant has secured the implementation of a program of historic building recording and analysis (RCHME Level 3 minimum), in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority and Historic England. Reason: In order to safeguard the special architectural or historic interest of the building consistent with Policy 7.8 of the London Plan 2015, Policy SP12 of the Haringey Local Plan 2013 and Policies CSV2, CSV3, CSV4 and CVS6 of the Haringey Unitary Development Plan 2006.
A16	**Elements of the facade and interiors that are to be retained** The Edmonton Dispensary (746 High Road) facade; Bill Nicholson's office and any other elements as appropriate should be kept in a safe secured place until they are ready to be installed in the new building. Once installed in the Tottenham Experience the elements should be retained in perpetuity. Reason: In order to safeguard the special architectural or historic interest of the building consistent with Policy 7.8 of the London Plan 2015, Policy SP12 of the Haringey Local Plan 2013 and Policies CSV2, CSV3, CSV4 and CVS6 of the Haringey Unitary Development Plan 2006.
A17	**Decommissioning of Energy Centres** Upon the connection of the site to a District Energy Centre or upon connection to a single site wide Energy Centre all existing energy centres installed in earlier phases of the development shall be decommissioned within a timescale to be agreed in writing by the Council. Reason: In order to ensure an appropriate level of energy efficiency and sustainability is provided by the development consistent with Policy 5.7 of the London Plan 2015 and

	Policies SP0 and SP4 of the Haringey Local Plan 2013.
A18	**Connection to District Energy Centre** Details of the connecting pipe work to enable a single connection for the whole development to a District Network shall be submitted to and approved by the Council prior to any work on plot 1 above ground. Reason: In order to ensure an appropriate level of energy efficiency and sustainability is provided by the development consistent with Policy 5.7 of the London Plan 2015 and Policies SP0 and SP4 of the Haringey Local Plan 2013.
A19	**Carbon Savings** Further details of how the carbon savings for the development have been calculated prior to any work on Plot 1 above ground. Reason: In order to ensure an appropriate level of energy efficiency and sustainability is provided by the development consistent with Policy 5.7 of the London Plan 2015 and Policies SP0 and SP4 of the Haringey Local Plan 2013.

B. CONDITIONS RELATING TO THE STADIUM (PLOT 1)	
Condition Ref.	Description
B1	**Consented Drawings** The development of Plot 1 shall be constructed in accordance with the plans listed under “Plot 1” in condition A3. Reason: In order to avoid doubt and in the interests of good planning.
B2	**Construction Environmental Management Plan** The construction of the Plot 1 development shall be carried out in accordance with the details in the Construction Environmental Management Plan approved by permission HGY/2014/1132. Reason: To protect the environment and amenities of the locality.
B3	**Air Quality and Dust Management Plan** The construction of the Plot 1 development shall be carried out in accordance with the details in the Dust Management Plan approved by permission HGY/2014/1133. Reason: To protect the environment and amenities of the locality.

B4	**Construction Waste Management Plan** The construction of the Plot 1 development shall not commence until a Construction Waste Management Plan in relation to the construction works for the Plot 1 development have been submitted to and approved by the Council. Reason: To promote a sustainable development consistent with Policies SP0, SP4 and SP6 of the Haringey Local Plan 2013.
B5	**Construction Hours** No demolition, deliveries or construction or works external to the building envelope associated with the construction of the Plot 1 development to be carried out outside the hours of 08:00-20:00, unless otherwise agreed in writing by the Council. Reason: In order to ensure that the proposal does not prejudice the enjoyment of neighbouring occupiers of their properties consistent with Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
B6	**Piling Method Statement** Piling shall take place in accordance with the details of the Piling Method Statement in approval HGY/2014/3399. Reason: To prevent the contamination of the underlying aquifer.
B7	**Telecommunications** Prior to construction of the Stadium super structure a Television Reception Mitigation scheme shall be submitted to and approved by the Council. Reason: In order to ensure that the proposal does not prejudice the enjoyment of neighbouring occupiers of their properties.
B8	**Temporary Site Hoarding** Prior to the hosting of the first Stadium Event a temporary hoarding strategy for the later phases of development shall be submitted to and approved by the Council and implemented and maintained until completion of the later phases of development. Any alterations to be agreed with the Council. Reason: To protect the environment and amenities of the locality.
B9	**Waste and refuse** A waste and refuse strategy for the Plot 1 development to be submitted and approved by the Council prior to the hosting of the first Stadium Event. Reason: In order to protect the amenities of the locality and to

	comply with Saved Policy UD7 of the Haringey Unitary Development Plan 2006 and Policy 5.17 of the London Plan.
B10	**Fixed Illuminated Signage** Prior to the occupation of the Stadium details of fixed illumination signage shall be submitted to and approved by the Council in accordance with signage zones as shown on Plan POP-4494-PLN-EL-0175 Rev O. Reason: In order to prevent the excessive proliferation of illuminated signage and to protect the amenity of the area.
B14	**Architectural Lighting** Prior to the the hosting of the first Stadium Event an architectural lighting strategy shall be submitted to and approved in writing by the Council. Reason: To protect the environment and amenities of the locality.
B15	**LED Screens** Prior to the hosting of the first Stadium Event an LED Screen strategy shall be submitted to and approved by the Council. Reason: To protect the environment and amenities of the locality.
B16	**Event Day Lighting** Prior to the hosting of the first Stadium Event an Event Lighting Strategy shall be submitted to and approved in writing by the Council. Reason: To protect the environment and amenities of the locality.
B17	**External Stadium Screens** External stadium screens shall only be operated in accordance with an approved strategy submitted to and approved in writing by the Council. Reason: To protect the environment and amenities of the locality.
B18	**CCTV** Prior to the hosting of the first Stadium Event a CCTV scheme for the Plot 1 development shall be submitted to and approved by the Council. Reason: To protect public safety and the amenities of neighboring residents.
B19	**Major Non-association Football Events** No more than 16 major non-association football events (greater than 10,000 visitors) in the stadium of which no more than 6 shall be music concerts.

	Reason: To protect the environment and amenities of the locality.
B20	**Music Events** The number of music events in the stadium shall be no more than 6 events per annum. Reason: To protect the environment and amenities of the locality.
B21	**Noise Control Plan** Prior to the occupation of the stadium for music concerts, a noise control plan shall be submitted to the Council including details of the mitigation measures included within Section 13.6 of the NDP Environmental Statement. The noise generated from music concerts must not exceed 75dB LAeq, over a 15 minute period as measured at a distance of 1 metre from the facade of any existing noise sensitive premises. Reason: To protect the environment and amenities of neighbouring residents.
B22	**Landscape Management** Within 1 year of commencing the Plot 1 development the applicant shall submit a landscape maintenance scheme for the Plot 1 development for approval by the Council. Reason: To ensure a satisfactory setting for the proposed development in the interests of the visual amenity of the area consistent with Policy 7.21 of the London Local Plan 2015, Policy SP11 of the Haringey Local Plan 2013.
B23	**Diesel Generators** Diesel generators in the Plot 1 development shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing as necessary to meet that purpose and shall not be used at any other time. At all times the generators shall be operated to minimise noise impacts and emissions of air pollutants and a log of operational hours shall be maintained and be available for inspection by the Local Planning Authority. Reason: To protect local air quality and promote sustainable development consistent with Policy SP4 of the Haringey Local Plan 2013 and Policy 7.14 of the London Plan.
B24	**Diesel Fuel** The diesel generators in the Plot 1 development shall run on ultra-low sulphur diesel (ULSD) meeting the fuel specification within EN590:2004. Reason: To protect local air quality consistent with Policy 7.14

	of the London Plan.
B25	**Flues** Unless otherwise agreed in writing by the Council all combustion flues in the Plot 1 development must terminate at least 1 m above the highest roof in the development in order to ensure maximum dispersion of pollutants. Reason: To protect local air quality consistent with Policy 7.14 of the London Plan.
B26	**Team Coaches** The Team coach drop-off area is only used by Team coaches and the coach drop-off area shall be supervised by trained stewards. Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation.
B27	**High Road Vehicular Access** The High Road vehicular access to the car park shall not be used between one hour prior to the start of a major event and one hour after the closure of a major event. Event day visitors must have their parking spaces allocated at least one hour before arrival. Reason: To avoid conflict between pedestrians and vehicles in the interest of public safety.
B28	**Mobile Telecommunications Equipment** Siting and details of mobile telecommunications equipment in the Plot 1 development shall be submitted to and approved by the Council prior to installation. Reason: In order to prevent the excessive proliferation of telecommunications equipment and to protect the amenity of the area.
B29	**Contamination** The construction of the Plot 1 development shall be carried out in accordance with the details in the Ground Contamination, Soil Remediation and Disposal Strategy approved by HGY/2014/1134. Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety in accordance with Policy 5.21 of the London Plan 2015 and Saved Policy UD3 of the Haringey Unitary Development Plan.
B30	**Replacement Bird Nests** Prior to the demolition of the existing stadium structure a Replacement Bird Nest Scheme shall be submitted to and approved by the Council. The scheme shall be implemented

	in accordance with the approved details. Reason: To ensure a sustainable development consistent with Policy 5.11 of the London Plan 2015 and Policies SP0, SP4 and SP11 of the Haringey Local Plan 2013.
B31	**Car Parking Management Plan.** Prior to the commencement of the use of the Stadium a car parking management plan demonstrating how safe arrival and departure can be achieved shall be submitted and approved by the Council. The approved car parking management plan shall be implemented prior to first use of the Stadium. Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation.
B32	**Service and Delivery** Prior to the commencement of the use of the Stadium a detailed service and delivery plan shall be submitted and approved by the Council. The approved service and delivery plan shall be implemented prior to first use of the Stadium. Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation.
B33	**Swept Path Analysis** Prior to the commencement of the use stadium a swept path analysis to demonstrate that large delivery vehicles can exit the site safely without causing delays to eastbound traffic along Northumberland Park. Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation.
B34	**Articulated Vehicles** Prior to the commencement of the use of the stadium a drawing to demonstrate that articulated vehicles can enter and leave the Sainsbury Megastore service yard in forward gear shall be submitted to approved by the Council. Reason: To reduce congestion and mitigate any obstruction to the flow of traffic on the transportation.
B35	**Electricity Connection** The Stadium shall not be used until UK Power has provided a connection capable of supplying the all the Stadium's electricity needs for all events. Reason: To protect local air quality consistent with Policy 7.14 of the London Plan.
B36	**Cooling Demand** Further information shall be provided on the cooling demand

	and the submission of detailed thermal modeling for Plot 1 shall be submitted and approved by the Council prior to works on plot 1 reaching above ground. Reason: In order to ensure an appropriate level of energy efficiency and sustainability is provided by the development consistent with Policy 5.7 of the London Plan 2015 and Policies SP0 and SP4 of the Haringey Local Plan 2013.
B37	**Construction Employment Programme** The construction of the Plot 1 development shall not commence above ground level until a Construction Employment Programme in relation to the construction works for the Plot 1 development have been submitted to and approved by the Council. Reason: To promote employment opportunities for local people.

C. CONDITIONS RELATING TO THE TOTTENHAM EXPERIENCE BUILDING (PLOT 2)	
Condition Ref.	Description
C1	**Consented Drawings** The development of Plot 2 shall be constructed in accordance with the plans listed under “Plot 2” in condition A4. Reason: In order to avoid doubt and in the interests of good planning.
C2	**Construction Environmental Management Plan** The construction of the Plot 2 development shall not commence until a CEMP in relation to the construction works for the Plot 2 development have been submitted to and approved by the Council. Reason: To protect the environment and amenities of the locality.
C3	**Air Quality and Dust Management Plan** The construction of the Plot 2 development shall not commence until an Air Quality and Dust Management Plan in relation to the construction works for the Plot 2 development have been submitted to and approved by the Council. Reason: To protect the environment and amenities of the locality.
C4	**Construction Waste Management Plan** The construction of the Plot 2 development shall not commence until a Construction Waste Management Plan in relation to the construction works for the Plot 2 development

	have been submitted to and approved by the Council. Reason: To promote a sustainable development consistent with Policies SP0, SP4 and SP6 of the Haringey Local Plan 2013.
C5	**Construction Hours** No demolition, deliveries or construction or building works associated with the construction of the Plot 2 development to be carried out outside the hours of 08:00-20:00 unless otherwise agreed in writing. Reason: In order to ensure that the proposal does not prejudice the enjoyment of neighbouring occupiers of their properties consistent with Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
C6	**Impact Piling Method Statement (proposed by Thames Water)** No impact piling shall take place during the construction phase of the Plot 2 development until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Council in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: To prevent the contamination of the underlying aquifer.
C7	**Waste and refuse** A waste and refuse strategy for the Plot 2 development to be submitted and approved by the Council prior to occupation of the Plot 2 development. Reason: In order to protect the amenities of the locality and to comply with Saved Policy UD7 of the Haringey Unitary Development Plan 2006 and Policy 5.17 of the London Plan 2015.
C8	**External Roof Terrace** No part of the external roof terrace in the Plot 2 development shall be in use between 24:00 – 07:00 hours any day of the week. Reason: In order to ensure that the proposal does not prejudice the enjoyment of neighbouring occupiers of their properties consistent with Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
C9	**Servicing and Deliveries** Prior to the occupation of Plot 2 a servicing and delivery plan

	for Plot 2 shall be submitted to and approved by the Council in writing. Reason: In order to ensure that the proposed development does not prejudice the free flow of vehicular and pedestrian traffic or the conditions of general safety of the highway consistent with Policy 6.13 of the London Plan 2015 and Saved Policies UD3 and M10 of the Haringey Unitary Development Plan 2006.
C10	**Security Shutters** Prior to the occupation of the Plot 2 development a security shutter scheme for the Plot 2 development shall be submitted to and approved by the Council. Reason: In order to retain control over the external appearance of the development in the interest of the visual amenity of the area and consistent with Policy SP11 of the Haringey Local Plan 2013 and Saved Policy UD3 of the Haringey Unitary Development Plan 2006.
C11	**Contamination** Prior to the commencement of the Plot 2 development: **A.** Desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority. **B.** If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:- • a risk assessment to be undertaken, • refinement of the Conceptual Model, and • the development of a Method Statement detailing the remediation requirements. The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority. **C.** If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any