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1 Introduction

- 1.1 This Planning Statement (the “Statement”) has been prepared and submitted by DP9 Ltd, on behalf of Tottenham Hotspur Property Company Limited (“THFC”) (the “Applicant”), to support a hybrid planning application and a listed building consent application at the Northumberland Development Project (“NDP”) site, Tottenham (the “Site”).

The Application

- 1.2 The planning application seeks hybrid planning 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. 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.”*
- 1.3 The development proposals are referred to in this Statement as “the Development”. A full description of the Development is contained within Section 3 of this Statement.
- 1.4 This Statement assesses the planning considerations associated with the Development and considers the Development in the context of national, regional and local planning policy and guidance. Section 5 of this Statement provides an overview of the key policy guidance relevant to the determination of the Development, whilst the text throughout the Statement refers to the relevant policy and guidance where necessary.
- 1.5 This Statement should be read in conjunction with the documents, plans and technical studies submitted in support of the application and set out below.

Application Documents

Documents comprising the Planning Application

- Covering Letter;
- Planning Application Form, Land Ownership Certificate C and Agricultural Holdings Certificates;
- Community Infrastructure Levy Additional Information Form;
- The Planning Application Boundary – Level 00 and 01 (Red Line Plan);
- Application Plans and Drawings for those elements of the development submitted for full planning permission, which are submitted for approval;;
- Parameter Plans;
The Parameter Plans prepared by Allies & Morrison and Populous define the extent of the buildings submitted for outline approval, those being the residential, the flexible community and / or office space, the Extreme Sports Centre and the community health centre. The development plots represent a 3-dimensional envelope within which all the outline buildings will come forward through subsequent reserved matters applications. The Parameter Plans also define the access routes into the site, and the uses being applied for.
These plans are submitted for approval.
- Illustrative Plans;
The illustrative plans prepared by Allies & Morrison and Populous show indicative proposals that reflect the development parameters for the elements submitted in outline . These plans are not submitted for approval.
- Design and Access Statement;
The Design and Access Statement (“DAS”) is prepared jointly by Populous and Allies & Morrison. The DAS explains the design rationale and content of the Development covering the design vision and objectives; a description of the design process; the overarching strategy and principles in relation to key topic areas such as the new stadium, the Tottenham Experience, the hotel, the Extreme Sports Centre, the residential and the health and community uses; and the open space and landscaping. The Design and Access Statement also assesses the Development for accessibility and inclusiveness for pedestrian movement and cyclists.
- Residential Design Code Document;
The Residential Design Code Document prepared by Allies & Morrison sets out a series of design codes for the residential component of the Development that relate to “appearance”. This comprises matters related to external appearance and

the internal layout of the residential buildings. The Design Codes establish a series of rules that will need to be followed when any subsequent reserved matters application relating to “appearance” is submitted.

This document is submitted for approval.

- Environmental Statement

The Environmental Statement prepared by Savills assesses the environmental implications of the Development and comprises:

- Non-Technical Summary.
- Volume I: Main ES Chapters.
- Volume II: Townscape, Visual and Built Heritage Assessment.
- Volume III: Technical Appendices.

- 1.6 These documents should be read together and considered as a whole. It is the combination of these plans and documents that provide sufficient detail to enable the environmental impacts of the Development, both those parts submitted in full and in outline, to be fully assessed in the determination of this planning application.
- 1.7 The following supporting documents should be read in conjunction with those set out above, and provide a justification for the scope and principles of the outline application.

Supporting Documents

- 1.8 The hybrid application is accompanied by a number of supporting documents and illustrative strategies. These documents are submitted to assist Haringey Council (the “Council”), other authorities and the general public in both understanding and evaluating the proposals.

- Planning Statement;
This Planning Statement prepared by DP9 provides an assessment of the proposed development against both adopted and emerging national, regional and local planning policy and guidance.
- Heritage Statement;
The Heritage Statement, prepared by Donald Insall Associates, assesses the impacts of the development on the heritage assets within the vicinity of the site.
- Transport Assessment;
The Transport Assessment prepared by Tim Spencer & Co. explains the transport related proposals and the implications and impacts of the Development on all aspects of transportation. The Transport Assessment is made up of two main reports which relate to non-major event day and major event day assessments.
- Travel Plan;
The Travel Plan prepared by Tim Spencer & Co sets out a strategy for promoting sustainable modes of transport during the life of the Development and reducing the reliance on private vehicle use in the future.
- Affordable Housing Statement;
The Housing Statement prepared by DS2 provides a description and justification for the proposed housing component of the scheme including the affordable housing element.
- Statement of Community Involvement;
The Statement of Community Involvement prepared by London Communications Agency explains all the consultation carried out during the pre-application stage of the project.
- Sustainability Statement;
The Sustainability Statement prepared by Buro Happold outlines the elements of the Development that address sustainable development issues. The document comprises both strategy and assessment elements in relation to sustainability including sustainable water management and waste management. For those parts of the Development for which outline approval is sought, the Statement provides sustainability guidelines and commitments for the future detailed design of the development and will be used to inform future reserved matters applications.
- Energy Strategy;
The Energy Strategy prepared by Buro Happold comprises both strategy and assessment elements in relation to energy. The Energy Strategy considers compliance with policy; a review of potential renewable technologies; procurement and delivery overall; and phasing considerations. For those parts of the Development for which outline approval is sought, the Strategy provides guidelines and commitments for the future implementation of the development from an energy perspective.

- Tree Survey;
The Tree Survey prepared by Forbes- Laird Arboricultural Consultancy sets out a clear approach to retaining existing trees on the Site and provides a new tree planting framework for the Development.

Structure of the Statement

1.9 This Statement takes the following form:

- Section 2 describes the Site and its surroundings and summarises the Site's accessibility.
- Section 3 sets out a summary of the Planning History.
- Section 4 describes the context for change.
- Section 5 sets out the description of development.
- Section 6 explains the consultation process.
- Section 7 identifies the planning policy framework that will be used to assess the acceptability of the proposals.
- Section 8 assesses the principle of development and regeneration of the site.
- Sections 9 to 13 assess the Development against relevant policy guidance and key tests.
- Section 14 address CIL and planning obligations arising from the development.
- Section 15 sets out the conclusions.

1.10 Appendices to this Statement comprise:

- Appendix 1 – Planning History for the application site
- Appendix 2 – Breakdown of submitted information for outline approval and matters that are reserved
- Appendix 3 – Crowd Safety Options Appraisal

2 Site and Surroundings

- 2.1 The application site is located in Tottenham, within the administrative boundary of Haringey Council.
- 2.2 The Site occupies an area of 8.97 hectares, and is bound by Lilywhite House (comprising the Sainsburys foodstore fronting Northumberland Avenue; the Tottenham University College; and Tottenham Hotspur Football Club's administrative offices) to the north, High Road to the west (A1010), Worcester Avenue to the east, and Park Lane to the south. The site is focussed on the White Hart Lane Football stadium, which is located at Bill Nicholson Way, 748 High Road, London N17 0AP.

The Site Boundaries

- 2.3 The southern site boundary runs east to west along the southern pavement of Park Lane, from Park Lane's junction with Vicarage Road to Park Lane's junction with the High Road, at which point it turns south along following the building line of the 732 High Road until the public conveniences that line the east side of High Road.
- 2.4 The western site boundary is formed by the western side of High Road from the point at which the boundary crosses the High Road to the south and extends north until White Hart Lane. The boundary then crosses High Road and continues up the eastern pavement of High Road to the junction of High Road and Northumberland Avenue.
- 2.5 The Club's northern boundary is largely formed by the boundary with Lilywhite House, which runs east to west from Worcester Avenue to the edge of the Sainsburys service car park to the rear of No. 792 High Road (Dial House). The site boundary then extends northwards up to Northumberland Avenue meeting the western boundary. The boundary includes the properties at 796 - 814 High Road. The site boundary in this location excludes Nos 792-794 High Road.
- 2.6 The eastern boundary runs along the eastern pavement of Worcester Avenue from Park Lane in the south to Northumberland Avenue in the north. The site boundary extends across the road to the pavement on the western side of the road but does not include the properties at Nos. 01-41 that flank Worcester Avenue to the west, and Nos. 02-32 that flank Worcester Avenue to the east.

The Existing Buildings on Site

- 2.7 The majority of the site is currently occupied by the existing White Hart Lane stadium ("the Stadium"), which is located to the south east of the site, bound by Worcester to the east and Park Lane to the South. The current Stadium has a spectator capacity of 36,237. Its four stands have been built at different times with the current East and West stands redeveloped in the 1980s and the North and South stands redeveloped in the early 1990s. The Stadium comprises a variety of different architectural treatments and the result is a building that does not make a positive contribution to setting of nearby Listed Buildings of the High Road Conservation Area. The current stadium is generally between 22-24m high, which is broadly equivalent to 7-8 residential storeys.
- 2.8 To the west of the Stadium, fronting on to High Road, are a series of buildings including:
 - The Club's merchandise store "Spurs Shop", located immediately west of the stadium on the junction of High Road and Park Lane. It is a single storey white rendered building and its existence is subject to a temporary planning permission. This building is identified as a detractor in the Conservation Area Appraisal.
 - No.744 High Road named "Warmington House". This is a grade II listed three storey building, three bays wide built in circa. 1828. The building, now vacant and boarded up, is built from period materials of brick and stucco, and was last used as the Tottenham Hotspurs Supporters Club offices. The building is set back from the High Road and has a two storey extension to the south and a further two storey extension to the west.
 - No.746 High Road named the "Dispensary". This is a locally listed building built in circa. 1910, it is three storeys high, and taller than Warmington House, and three bays wide. It is built from stone and red brick and is now vacant and boarded up.
 - No.748 High Road named the "Red House Coffee Palace". This locally listed building is three storeys high with two pitched roofs. It is situated on the southern corner plot at the junction of High Road and Bill Nicholson Way, which has now been stopped up. It is accessed from Bill Nicholson Way.

- No.750 High Road named “Valentino’s”. This is a locally listed building, and a former public house was built in circa. 1890/early C20. The building occupies the northern corner plot of High Road and Bill Nicholson Way. It is three storeys high and currently vacant.
- 2.9 To the north of the Stadium and Valentino’s up to Lilywhite House and Dial House, the site is hoarded along the High Road and Worcester Avenue. The land within this hoarding includes the Archway Metals buildings with the rest of this part of the site currently subject to site clearance and preparatory ground works associated with the previous planning permission for the development of a new stadium (ref: HGY/2010/1000).
- 2.10 The northern part of the site, known as the “Northern Terrace” includes the following buildings:
- Nos. 794, 796, 798 – 802. These buildings are a continuous terrace of three storey high mid C18 period properties. The houses are of irregular size; Nos. 794 and 796 are of five bays, the others narrower. Nos. 798-802 continue the mid C18 terrace. The narrow gap that once existed between Nos.798 and 802 has been built over at 1st and 2nd floor levels in modern times in a reasonably sympathetic style. The properties are built within plots and set back from the High Road, with each having a front forecourt and boundary treatment. They are all statutorily grade II listed apart from 796 High Road, named “Percy House” which along with its forecourt, walls and railings, is Grade II*. 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) that will refurbish and bring the building back into use as a community facility.
 - Nos. 804/806. These properties are contained within a further three storey terrace block. They are not statutorily or locally listed and are not identified as positive contributors to the Conservation Area.
 - Nos. 808/810. They are grade II* listed buildings and together are a pair of early red brick C18 symmetrical properties of 3 storeys plus attic. They sit back from High Road and have front forecourts and boundary treatments. No. 810 benefitted from investment from Historic England (previously English Heritage) to restore it.
 - No. 814. This property is located on the southern corner plot at the junction of the High Road and Northumberland Park in a single mid C19 two storey building, with its principal elevation fronting onto Northumberland Park. The building is locally listed.
- 2.11 Dial House, located at No. 790 High Road and the adjacent property at No. 792 High Road do not form part of the application site.

The Surrounding Area

- 2.12 The site is located in Northumberland Park Ward, one of the most vibrant and diverse parts of the borough, an area that also has significant levels of deprivation and higher rates of unemployment than in the rest of Haringey or London.
- 2.13 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 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.
- 2.14 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 at any level. However, this section of High Road running that runs north from Bruce Grove to the stadium accommodates a wide variety of town centre uses such as Council Offices, Tottenham Sports Centre and a Public Library. This is supported by a range of retail uses.
- 2.15 The London Liverpool Street to Stansted 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.
- 2.16 The Public Transport Accessibility Level (PTAL) for the site, which is a theoretical measure of the accessibility within London, ranges from 3 (moderate accessibility) to 5 (good accessibility).
- 2.17 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.

- 2.18 As a developed urban area, there is little high quality open space available and Northumberland Park has been assessed as being deficient in open space as stated within the Open Space SPD. The closest public park is Bruce Castle Park approximately 300m south west of the site.

3 The Planning History

3.1 The application site is the subject of an extensive planning history, which is included at Appendix 1.

3.2 The most relevant planning history for the NDP is largely focused on four principal planning permissions:

- The original “NDP planning permission”, reference HGY/2010/1000, which secured part full and part outline planning permission for the redevelopment of the NDP site for a new football stadium and associated non-football development to the north and south of the new stadium site. This permission was granted on 20th September 2011.
- The “Northern Development permission”, reference HGY/2011/3250, which secured a new full planning permission for the northern element of the NDP site, comprising foodstore, education, stadium-related and showroom/brand centre uses. This permission was granted on 29th March 2012.
- The “Southern Development permission”, referenced HGY/2011/3251, which secured a new outline planning permission for the southern part of the NDP site for residential, college, health club and centre and office uses. This permission was granted on 29th March 2012.
- The “Stadium Basement permission”, referenced HGY/2015/0964, which secured a minor material amendment to the “NDP Planning Permission” for a new basement level beneath the approved stadium, to accommodate changes to the proposed basement and ground floor layouts, and the removal of certain conditions. This permission was granted on the 08th July 2015.

3.3 A summary of these applications is provided below.

The NDP Permission HGY/2010/1000

3.4 The Club secured planning permission in September 2011, referenced HGY/2010/1000, for the redevelopment of the NDP site to provide for a new stadium and associated non-football development to the north and south of the new stadium. Associated with the planning permission were listed building and conservation area consents.

3.5 The planning permission comprised for three phases of development, including:

- The Stadium;
- The Northern Development; and
- The Southern Development.

3.6 A summary of the development consented within each of these phases is provided below.

The Stadium Development

3.7 Full planning permission was secured for a new football stadium and associated development. The stadium had a seating capacity of 56,250, and included ancillary food, beverage and entertainment uses. The stadium building included 319 car parking spaces. :

3.8 The podium, immediately to the south of the stadium building, includes the following uses:

- Club retail superstore – 3,610 sqm;
- Club museum (within superstore) – 570 sqm;
- Ticket office (within superstore) – 190 sqm;
- Café – 280 sqm;
- 40 car parking spaces associated with the hotel use in the “Southern Development”;
- 16 outside broadcast vehicle parking spaces; and
- Plant rooms.

The Northern Development

- 3.9 As part of the NDP permission, to the north of the main stadium proposal known as the “Northern Development”, full planning permission was secured for a mixed use building with car parking at ground floor level and a retail foodstore at part ground and first floor level, with stadium-related development (office and hospitality) at second and third floor level.
- 3.10 The consented proposals for the Northern Development Phase were varied through an application to secure non-material amendments, which were secured under non-material amendment (“NMA”) approval HGY/2012/0096.

The Southern Development

- 3.11 To the south of the main stadium proposal, known as the “Southern Development”, outline planning permission was secured for development of up to 200 residential units within a crescent-shaped building fronting onto Park Lane, incorporating up to 1,000 sqm of office floorspace at first floor level to accommodate the Tottenham Hotspur Foundation. The outline permission allows for a residential building that rises from six and a half storeys at both ends up to ten storeys in the centre. A maximum of 130 car parking spaces would serve the residential, located at basement level and below the podium level.
- 3.12 Outline permission was also secured for a hotel up to 150 bedrooms, located at the eastern end of the podium level.
- 3.13 The outline consent for the residential and hotel reserved detailed matters relating to design and scale for approval at a later stage.

Conservation Area Consent HGY/2010/1001

- 3.14 Associated with the NDP planning permission, the Club also secured conservation area consent, referenced HGY/2010/1001, for the demolition of a number of unlisted buildings within the red line boundary of the NDP planning permission. Consent was secured to demolish Nos.:

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.

- 3.15 To date, the following buildings have been demolished pursuant to conservation area consent HGY/2010/1001:

- 742 High Road
- 744a High Road
- 752a High Road
- 752b High Road
- 752c High Road
- 754-766 High Road
- 768-772 High Road
- 776 High Road
- 778-788 High Road
- 2-6 Northumberland Park

Listed Building Consent HGY/2010/1002

- 3.16 Associated with the NDP planning permission, the Club secured listed building consent to undertake alterations to the grade II listed Warmington House.

Listed Building Consent HGY/2010/1003

- 3.17 The club also secured building consent for the demolition of Fletcher House.
- 3.18 The listed building consent has been implemented and Fletcher House has subsequently been demolished.

The Northern Development Permission HGY/2011/2350 & HGY/2013/1976

- 3.19 In December 2011 the Club submitted a new stand-alone planning application for a revised scheme for the 'Northern Development' part of the NDP site.
- 3.20 The application proposals were for broadly the same form of development to that secured through the NDP permission, but proposed changes to increase the size of the third and fourth floors of the development for stadium-related uses and changes to the retail foodstore.
- 3.21 The application was approved on 29th March 2012 and provided full planning permission for the following development:
- A foodstore at ground and first floor level with a total GIA of 23,470m² and net sales floor area of 7,201 sqm, comprising:
 - 12,229m² at ground floor, albeit mainly car parking;
 - and 11,250m² at first floor;
 - A second floor of 5,666m² (GIA) for stadium-related use (D2) or showroom / brand centre use (sui generis) or any combination in between;
 - A third floor of 3,238m² (GIA) for education use (D1) or stadium-related use or any combination in between; and
 - A fourth floor of 3,055m² (GIA) for stadium-related use.
- 3.22 Following the grant of planning permission for the Northern Development proposals, the Club submitted four non material amendment planning applications to secure approvals for non-material changes to the approved scheme. Furthermore, in 2013, two section 73 applications were submitted to amend the uses permitted within the second floor of the building to allow for occupation by the University Technical College.
- 3.23 This planning permission has been fully implemented.

The Southern Development Permission HGY 2011/2351

- 3.24 In December 2011 THFC submitted a stand-alone planning application for a different form of residential-led development for the Southern Development element of the NDP scheme.
- 3.25 The application was approved on the 29th March 2012 and provides outline planning permission for the following development:
- 285 units within four blocks, comprising 1 and 2 bed units only;
 - 200 car parking spaces;
 - Up to 15,000 sqm of floorspace for college, health club and centre; and office space within the ground to third floors.
- 3.26 The application was submitted with matters relating to appearance, scale and landscaping to be submitted in detail for approval at a later date through the submission of reserved matters applications. A reserved matters application for appearance has been submitted, reference HGY/2015/0797 but has not been determined.

Stadium Basement Permission HGY/2015/0964

- 3.27 The NDP permission was amended via an application for a minor material amendment which was approved on 8 July 2015. The application comprised two elements:
- A new basement beneath the stadium (part one); and
 - Deletion and rewording of various conditions (part two).
- 3.28 The new basement under the proposed north, east and west stands of the approved stadium accommodates 259 of the 319 consented car parking spaces that were previously located at ground floor level. In addition to the car parking areas, the new basement accommodates c4,800 sqm of stadium back of house / storage areas and 1,500 sqm of VIP lobby / reception areas associated with the car parking.
- 3.29 The floor area at ground floor level that previously accommodated the 259 car parking spaces provides additional changing room and associated facilities such as press conference room and briefing room.

- 3.30 The following conditions were removed: 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, the following conditions were varied: 2, 30, 54 and 58.

Summary

- 3.31 These four planning applications, all of which remain extant, have established the principle for the mixed-use redevelopment of the NDP site to provide for a range of uses including stadium, retail, leisure, residential, community and employment floorspace.

4 The Context for Change

- 4.1 The Club has already secured the necessary approvals (planning permissions, conservation area consents, listed building consents and Compulsory Purchase Order (CPO)) to enable it to develop a new stadium and associated development on the NDP site. However, securing these approvals has taken over 8 years, during which time there has been significant change to the context within which a new development will be brought forward.

Regeneration Context

- 4.2 The Tottenham riots of 2011 has placed a greater focus on Tottenham amongst central, regional and local government, with the Wards within Tottenham still amongst the most deprived in London. There is now a very clear agenda for the public sector to drive forward the regeneration of Tottenham, to deliver more and better quality homes; enhanced access to new and improved services and facilities including health and well-being; provide better access to jobs and training; and improve the quality of the environment.
- 4.3 In response to this need for change, the Council and the Greater London Authority (“GLA”) are working on a 20-year regeneration programme for Tottenham, which is focussed on delivering in excess of 10,000 new homes in the wider area, along with a delivering a step-change in the quality and provision of services and facilities and public transport accessibility that will serve the growing community.
- 4.4 At the centre of this plan is the regeneration and redevelopment of two large housing estates directly to the east and west of the NDP site, Northumberland Park and High Road West respectively. It is envisaged that these two areas alone will deliver in excess of 7,000 new homes.
- 4.5 The Council and the GLA are preparing detailed masterplans to guide the future regeneration and redevelopment of these two areas over the next 20 years which is intended will deliver transformational change to the area. To facilitate implementation and accelerate the delivery of housing the Council is currently bidding to secure ‘Housing Zone’ status for this part of Tottenham.
- 4.6 The design of the consented scheme didn’t envisage that the Council in partnership with the GLA and the Club, would embark on plans to deliver the comprehensive regeneration and estate renewal of over 25 hectares of land to the east and west of the stadium, which is expected to deliver thousands of new homes in Tottenham. It is critical therefore to the success of the sustained regeneration of Tottenham, that the stadium and its surrounding development, which sits at the cross roads between the High Road West and Northumberland Park regeneration areas, is fully integrated with the future redevelopment of the area and results in a cohesive new piece of city.

Stadium Brief

- 4.7 As identified above, the concept of the consented scheme design has its origins back in 2007, with the stadium design finalised in 2010, at which point a planning application was submitted and subsequently approved in 2011. It was not until earlier this year that the Club had secured all the relevant statutory approvals to allow it to commence with construction of the development.
- 4.8 During this significant delay in securing these approvals, the regeneration context (outlined above) has changed considerably and so too has the Club’s own requirements and needs of the stadium and associated development, as well as the technical requirements and specifications demanded for world class stadia.
- 4.9 Responding to this changing context, the Club appointed a new design team of market leading design specialists, including Populous (stadia and sports related development); Allies & Morrison (residential); and Donald Insall Associates (heritage architects and advisors).
- 4.10 There are a number of factors that influenced the design brief for the new team which are as follows:
- **The need to place the stadium in its heritage context in a more holistic manner.** To inform how best the development could positively respond to, and engage with, the surrounding heritage context, the Club commissioned the production of a Conservation Management Plan. The Club is of the view that the previous consented stadium scheme did not optimise the relationship between new and old, and resulted in a rather

compromised scheme. The preparation of the Management Plan was intended, partly, to inform how a new stadium could better and more appropriately respond to the High Road Conservation Area. The Management Plan also set out a revised approach to the retention of individual heritage assets within and adjacent to the site boundary; and the progression of specific schemes for two Grade II* listed buildings in THFC ownership as a means of catalysing the regeneration of the wider Northern Terrace.

- **Improving crowd safety in light of new advice.** 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.
- **Expanding the multi-use nature of the stadium.** To maximise the regeneration potential of the development, the stadium needs to be in active use throughout the year in advanced stages of agreement with several non-footballing organisations to deliver additional activities such as concerts, other sports and community events. A key priority was also to secure the agreement of the National Football League (“NFL”) to host American football matches on a regular basis within the new stadium. Ensuring compliance with NFL requirements was a significant influence on the design brief.
- **The need to further improve the overall viability of the project.** The previous scheme was designed to respond to a property market that was in the depths of a recession. There was a clear need therefore that the development as a whole provided the optimum value whilst securing key regeneration objectives, particularly since construction costs have risen significantly during the period caused by the delay to the CPO.

4.11 The brief to the new design team therefore was to respond to these factors in order to create a better, more viable scheme that accommodates a greater range of uses; and a stadium that better relates to the existing heritage context and improves crowd safety over and above the consented stadium.

4.12 Further influencing factors that were identified by the Club for the new stadium and surrounding development included:

- That it should address its context in built heritage, urban design and townscape terms. Whilst the general scale of the new stadium has been established through the approved scheme, the Club believes that how the proposed stadium is integrated into the urban form can be further improved in order to respond more appropriately to the existing heritage context and provide a much improved public realm on both match days and non-match days.
- That it should adopt place making best practice. There are good examples elsewhere in London and the wider UK, such as King's Cross, where heritage environments have had selective interventions in order to deliver a net overall gain in overall heritage terms.
- That it should reflect to the significance of the High Road, its historical continuity and the continuing cultural significance of Tottenham Hotspur Football Club in this location. Doing this will ensure that the scheme offers benefits to the public on non-match days as much as match days.
- That it should respond to national, regional and local requirements to increase the delivery of new housing and make the most efficient use of brownfield land.
- That it should maximise the community benefits and capitalise on the gateway the stadium now represents linking the west and east schemes.

5 Description of Development

- 5.1 The Development comprises a single hybrid planning application for the demolition of all structures on the Site and its comprehensive redevelopment for a mix of uses; and the retention and conversion of the grade II listed Warmington House for museum use. Accordingly, planning permission is being sought for the following:
- "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."*
- 5.2 The application is a hybrid planning application that seeks full approval for part of the development and outline approval for part of the development with some matters reserved at this stage. Those parts of the site for which full and outline approval are sought is shown on Plans PP_001 – PP_008.
- 5.3 The hybrid planning application is constructed as follows:
- 5.4 Full Planning Permission will be sought for:
- The main stadium building 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;
 - The hotel and associated serviced apartments at upper floor level; and
 - The demolition of a number of buildings including three locally listed buildings.
- 5.5 Outline Planning Permission will be sought for:
- The four residential blocks and the flexible community/office floorspace in the lower floors of the podium below the residential. 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 Extreme Sports building. 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. 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 will be submitted as part of the full planning application for the main stadium.
- 5.6 For those matters that are reserved at this stage, the application provides a sufficient level of detail in accordance with the requirements of the Town and Country Planning (Development Management Procedure) (England) Order 2015 ("DMPO"). A detailed breakdown of the information submitted for outline approval and the information provided in support of those matters that are reserved are set out in a schedule in Appendix 2.

Amount and Uses of the Development

- 5.7 In summary, the application seeks permission for the following development:

Table 5.1: Total Floorspace and Units by Use Class

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

The Various Development Components

5.8 For the purposes of this Statement, the Northumberland Development Project can be broken down in to a series of development components in order to describe and assess each element of the scheme. However, other than for the purposes of this Statement, the scheme has been designed to form a single cohesive development and should be read as a whole.

5.9 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.

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

The New Stadium (Use Class D2)

5.11 At the heart of the development will be a new state-of-the-art multi-functioning stadium with a seating capacity for 61,000 spectators. Key features of the new stadium include:

- A dramatic asymmetrical designed stadium with a seating capacity for 61,000 spectators, including the largest single tier stand in the UK with 17,000 seats, which will be the new 'home' stand.
- A fully retractable pitch that allows the stadium to operate as a genuinely fit-for-purpose, multi-functional stadium. The football pitch will be 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 sports and community events. It is intended that the stadium will host up to 10 sports events (unrelated to Tottenham Football Club) and 6 non-sports events per annum.
- A new five-storey atrium space within the south stand, the 'Home End' of the stadium. This atrium space will provide a range of food and beverage outlets that will be a focus for fans before and after the match.
- A high quality and innovative appearance, with a sculptured mesh wrapping and folding its way around the stadium before reaching the home end, where a glass façade arches upwards to reveal the single tier home stand.
- A prominent stadium 'front door' opening up onto the High Road, through which the activity and vibrancy of the stadium will be visible from the street, enlivening this part of the High Road.
- A Media Café at the north west corner of the stadium, fronting on to the High Road. The café will be open throughout the year, again adding to the vitality and vibrancy of the High Road.
- A prominent entrance for the East Stand onto Worcester Avenue.
- First class conference and banqueting facilities to enable the Stadium to be active 365 days a year.
- A unique 'Sky Walk' along the South Stand. This is a visitor attraction for fans and the public alike, allowing people to climb the exterior of the building up to 40 metres high and take in views across London.
- Match day car parking located beneath the stands and in the basement, removing cars from the street scene. The car parks will be accessed from the High Road and Worcester Avenue.
- A new covered service area to reduce noise and disruption for local residents.

Tottenham Experience (Sui Generis)

5.12 A key component of the new stadium will be the Tottenham Experience facility. This multi-use facility, located along the High Road immediately to the south of the stadium, will provide a new visitors' centre for the stadium, comprising a mix of uses that will be open throughout the year. Importantly, the Tottenham Experience will integrate the grade II listed Warmington House, using the historic building to accommodate museum and cultural uses.

- 5.13 The Tottenham Experience will accommodate a wide range of club-related uses within a single integrated building. The multi-use nature of the building does not fall within any of the defined use classes, and is therefore a sui generis use. The uses within the building will comprise the following elements:
- Museum and learning facilities including:
 - A Museum of Tottenham Heritage – allowing people to access historic archives, collections and stories about the local area and the Club’s role in the history of Tottenham in a relaxing and welcoming environment, with views onto the High Road and onto the podium level next to the Stadium.
 - An interactive Club Museum – utilising interpretive media designed to tell the Club’s history, display Club artefacts, host the Hall of Fame and encourage the visitor to explore all aspects of the Club and its home in Tottenham.
 - Kinetic motion-sensor Skills Booths – allowing visitors to test their skills against key players past and present and to re-create memorable moments from the historic archives.
 - A new Club shopping experience, utilising the latest retail concepts including touch display walls and the ability to see an image of yourself wearing different merchandise.
 - A cinema space, that will form a key component of the Club Museum and stadium tour experience and which provide a venue for private screenings and local community events.
 - An ‘arrivals hub’ serving the whole Tottenham Experience, from where visitors can collect tickets for stadium events, access the stadium tour and change for the Sky-Walk.
- 5.14 At the heart of the Tottenham Experience will be the integration of a retained and restored Warmington House. The proposals seek to convert the heritage building to provide museum space as part of the wider Tottenham Experience attraction, retaining and respecting the existing plan form and layout. A series of sympathetic and high quality interventions to create a museum space will ensure that a long term and viable use is established for this heritage asset, securing its long term future. Importantly, the museum space created is intended to display, deposit and archive the heritage of the Club and this part of Tottenham. It will also allow for the incorporation of key elements of the three buildings that will need to be demolished to deliver the Tottenham Experience, those being 746, 748 and 750 High Road.
- 5.15 The form and layout of the Tottenham Experience, either side of Warmington House, has been designed to optimise crowd safety on match and events days, ensuring the safe movement of large volumes of people along this section of the High Road. The built form will be set back a minimum of 9.5 metres from the kerb edge, which provides sufficient space to allow for the safe movement of the large numbers of spectators that are expected to visit the stadium.

Hotel and Serviced Apartments (Use Class C1)

- 5.16 Located in the south west corner of the site, at the junction of High Road and Park Lane, will be a 22 storey hotel, acting as a landmark gateway to the scheme for those approaching from the South.
- 5.17 The hotel building, which will be a long blade shaped building on a broadly north-south axis running down the High Road, will rise to a maximum height of 82.9m above ground, and will comprise 22 storeys. The building will be integrated with the stadium podium on its north and eastern elevations.
- 5.18 The hotel will have 180 bedrooms arranged over floors 3 to 14 and there will be 49 serviced apartments over floors 15 to 21. This visitor accommodation will directly support the conference and banqueting facilities at the Stadium by providing high quality accommodation for people attending events, as well as serving the growing economy in Tottenham.
- 5.19 Over the lower floor levels of the hotel will be associated amenity services expected of a quality hotel, including restaurants, bars, workspace, gym, swimming pool and corporate facilities. At the top floor level will be a foyer restaurant and roof-top bar, offering spectacular views over the rest of London.
- 5.20 The hotel will be served by a dedicated basement car park accessed directly off 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.
- 5.21 To facilitate the wider regeneration of Tottenham, it is intended 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.

The Extreme Sports Centre

- 5.22 Located along Park Lane will be an innovative new sports centre that has the potential to accommodate extreme sports and other sports focussed leisure activities. 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.
- 5.23 The vision is that the building will offer a range of unique sporting activities, with the potential to include one of the world's tallest indoor climbing walls, as well as climbing wall along the outside of the building. Furthermore, the opportunity to incorporate a scuba diving tank is 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.
- 5.24 At the top of the building, 51.2m above ground floor, 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.
- 5.25 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.

The Southern Residential

- 5.26 The Southern Residential component will create a new residential quarter in the south-east corner of the site, fronting both Park Lane to the south and Worcester Avenue to the east.
- 5.27 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 however in relation to the "layout" and "scale" of the buildings as well as "access".
- 5.28 To provide a degree of certainty as to 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 establishes a series of mandatory design guides 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.
- 5.29 The residential development will deliver up to 585 new homes, comprising a mix of town houses and apartments. Although not submitted for approval at this stage, an indicative mix of units for the residential comprises the following:

Table 5.2: Indicative Residential Mix

Number of Bedrooms	Number of Units	Proportion of Units (%)
Studio	20	3%
1-bed	268	46%
2-bed	268	46%
3-bed	29	5%
TOTAL	585	100%

- 5.30 The Southern Residential will comprise four tall buildings that sit above a three storey podium building. The residential buildings include two 16 storey buildings (a maximum of 69m above ground), a 24 storey building (a maximum of 96m above ground) and a 32 storey building (a maximum of 123m above ground).
- 5.31 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.
- 5.32 There will also be 5 three bedroom townhouses located on Park Lane, with front doors and gardens fronting on to the pavement edge.
- 5.33 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 parking will be access from a vehicle access point on Worcester Avenue, and residents will have direct lift access from the car park directly into the residential blocks. Ancillary services including waste reuse and recycling and energy will be located in the basement and lower floor levels.

Flexible Community / Office Space (Use Class D1 and / or D2 and / or B1)

- 5.34 Within plinth, beneath the residential blocks, is the provision of flexible floorspace located principally at first and second floor level. This flexible floorspace is submitted for outline approval at this stage in the same format as the residential uses on the upper floors of the plinth i.e. matters relating to “appearance” and “landscape” reserved at this stage.
- 5.35 Planning permission is sought for a degree of flexibility regarding the land uses that could occupy the floorspace. Permission is sought for the floorspace to be occupied by any one or mix of the following uses: community (Use Class D1, leisure (Use class D2) and office (Use class B1).
- 5.36 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 accommodate a site wide energy centre, subject to detailed feasibility testing.
- 5.37 There is the potential for these uses to occupy up to 3,500 sqm (GIA) of floorspace, located at partially at ground and first floor level, with the substantive element at second floor level.
- 5.38 The floorspace will have access lobbies directly at street level on both Park Lane and Worcester Avenue.

Community Health building (Use Class D1)

- 5.39 The scheme includes the provision of a new community health building in the north east of the site, fronting onto Worcester Avenue.
- 5.40 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, however, covering the “layout” and “scale” of the building as well as “access” and “landscape”.
- 5.41 The building will be two storeys above ground, rising to a maximum height of 21m above ground.
- 5.42 The health uses will be located at first and second floor levels. The groundfloor of the building will provide servicing space associated with the operation of the Stadium. The ground floor is not designed as internal floorspace.
- 5.43 It is proposed that the health centre will be one of the first buildings to be delivered as part of the development and will increase access to much needed, new, NHS healthcare facilities within this part of Tottenham.

The Public Realm

- 5.44 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 - picking up the High Road, Park Lane and Worcester Avenue – as well as areas of podium to the north and south of the Stadium.
- 5.45 The south podium is a multi-use space that incorporates a new public square, which is intended to host a variety of sports and community use. It is envisaged that the Tottenham Hotspur foundation will operate a series of programmes and initiatives that will use the podium space to ensure that it is an active space on non-event days and importantly provides an opportunity for the space to be used by local residents both formally and informally.
- 5.46 Importantly, this podium space will offer a key east-west route across the site, helping to increase connectivity and integration with the two adjoining regeneration areas at High Road West and Northumberland Park. .
- 5.47 The public realm also needs to serve two very different requirements. On match days it must be physically large enough and designed to meet the needs of the fans who arrive in large numbers and then leave in a relatively short period of time. However, on non-match days the public realm on all sides must appear as a seamless part of the experience of moving around the area and provide welcoming and attractive spaces to visit and enjoy.

6 Consultation Process

- 6.1 This Section should be read in conjunction the Statement of Community Involvement, prepared by London Communications Agency, which is submitted in support of the application.
- 6.2 The Statement of Community Involvement explains all consultation carried out during the pre-application stage. Section 5 of the Design and Access Statement also sets out the keys stages in the design development of the scheme.
- 6.3 This Section provides a description of the statutory consultation process undertaken, including the pre-application process with Haringey Council; the Greater London Authority (GLA): Transport for London (TfL); Heritage England and other statutory consultees. It also summarises the public consultation exercise set out in detail in the Statement of Community Involvement.
- 6.4 The consultation process was agreed with Haringey Council and follows the principles set out in the adopted Haringey Council Statement of Community Involvement (2011)

Mayoral Referral

- 6.5 The application is referable to the GLA as it exceeds the relevant thresholds set out in The Town and Country Planning (Mayor of London) Order 2008. Accordingly the GLA has been involved in formal pre-application discussions with the Applicant and Haringey Council from an early stage and the emerging application scheme was presented to the Mayor of London on 29 July 2015.

Pre-application Discussions

- 6.6 Formal pre-application discussions have been held with the Council; the GLA; and TfL on the evolving scheme since mid-2014. However, weekly pre-application meetings with Haringey Council, and the GLA and TfL when required, have been held since the beginning of May 2015. Topics covered during the pre-application meetings included:
- Planning Strategy and Application Format;
 - Planning Policy and Land Use;
 - Design and Townscape;
 - Heritage and Conservation;
 - Regeneration and Surrounding Masterplan Development;
 - Transport;
 - Environmental Considerations; and
 - Affordable Housing, Viability and Section 106.
- 6.7 The emerging scheme was presented to the Haringey Quality Review Panel (QRP) on 15 July 2015.
- 6.8 A pre-application briefing to Haringey Council's Planning Committee, which comprised a presentation and question and answer session, was held on 23 July 2015.

Heritage England Consultation

- 6.9 The emerging scheme proposals were presented to Historic England's London Advisory Committee on 25 June 2015.
- 6.10 Two further pre-application meetings were held with Historic England on Thursday 25 June 2015 and Friday 24 July 2015 with subsequent changes to the scheme design to address heritage matters. Section 5 of the Design and Access Statement outlines how the scheme design has been amended to take account of comments received in relation to Warmington House and the scheme's impact on the Conservation Area.

Public Consultation Exercise

- 6.11 The public consultation exercise is described in detail in the Statement of Community Involvement, a summary is provided below.

- 6.12 The public consultation was intended to initiate a dialogue between the Applicant and the key stakeholders and local community in order to understand their objectives, aspirations and expectations.
- 6.13 The emerging scheme proposals have been subject to on-going public consultation since the beginning of July 2015 through the use of a consultation website at www.tottenhamhotspur.com/new-scheme. The website provides information on the project and can be used to follow the consultation process, receive updates on the scheme and provide formal feedback.
- 6.14 The Club also distributed a newsletter to over 20,000 local residents within the Tottenham area. The newsletter contained all the key information relating to the emerging scheme proposals.
- 6.15 A Development Management Forum was also held on 15 July 2015 to which all members of the public were able to attend. The event was advertised by Haringey Council, which includes site notices and advertisement on the Council's website. The Development Management Forum comprised a presentation by the Club and the design team followed by question and answer session. The meeting was chaired independently by Haringey Council.
- 6.16 The consultation strategy will continue post submission, throughout the determination of the application and beyond.

Key Themes from the Public Consultation Process

- 6.17 A wide range of themes emerged through the public consultation process, including:
- The management of match-day crowd flows and vehicular movements;
 - The provision of services and facilities associated with the new housing;
 - The provision of affordable housing;
 - The treatment of heritage assets;
 - Overall design and townscape matters; and
 - The distribution of height across the site and their relationship with the shopping centre;
- 6.18 Throughout the consultation exercise, the scheme has evolved in line with the comments from statutory consultees and the public.

7 Planning Policy

- 7.1 The purpose of this Section is to identify the key national, regional and local planning policy and guidance relevant to the determination of the application for the Development, and against which the proposals have had regard to during design development. An analysis of the key policies and tests is included in the relevant sections.
- 7.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise.
- 7.3 The relevant statutory Development Plans for the site comprises:
- The London Plan (March 2011) (as amended);
 - The Haringey Local Plan: Strategic Policies (2013); and
 - The Saved Policies of the Haringey Unitary Development Plan (UDP) (2006).
- 7.4 In addition to the Development Plan, regard has been had to national planning policy and guidance as set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). Regional supplementary documents and guidance as adopted by the Mayor of London and local supplementary guidance as adopted by LBH.

London Plan (2015)

- 7.5 The London Plan was formally adopted in July 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years. The London Plan has recently been revised by the revised early minor alterations (REMA) (2013) and more recently Further Alterations to the London Plan (FALP) (2015) to reflect key housing and employment issues within London.
- 7.6 The London Plan contains a number of key policies relevant to the development proposals including:
- Policy 2.6 Outer London: Vision and Strategy
 - Policy 2.7 Employment: Outer London Economy
 - Policy 3.3 Increasing Housing Supply
 - Policy 3.4 Optimising Housing Supply
 - Policy 3.7 Large Residential Developments
 - Policy 4.1 Developing London's Economy
 - Policy 4.5 London's Visitor Infrastructure
 - Policy 4.6 Support for and enhancement of arts, culture, sport and entertainment
 - Policy 5.2 Minimising carbon dioxide emissions
 - Policy 5.3 Sustainable design and construction
 - Policy 5.5 Decentralised energy networks
 - Policy 5.6 Decentralised energy in development proposals
 - Policy 5.7 Renewable energy
 - Policy 7.4 Local Character
 - Policy 7.6 Architecture
 - Policy 7.7 Location and Design of Tall and Large Buildings
 - Policy 7.8 Heritage Assets and Archaeology
 - Policy 7.9 Heritage-Led Regeneration

Haringey Local Plan: Strategic Plan (2013)

- 7.7 Local planning policy is set out in Haringey Local Plan: Strategic Policies document that was adopted in 2013. The UDP Saved Policies (January 2010) are also still relevant and support the Strategic Policies by providing additional detail. The Council also have Supplementary Planning Guidance (SPG's) that need to be taken into consideration.
- 7.8 Key LBH adopted policies that are relevant to the development proposals are as follows:
- Policy SP0: Presumption in favour of sustainable development
 - Policy SP1: Managing Growth
 - Policy SP2: Housing
 - Policy SP4: Energy / Sustainability
 - Policy SP7: Transport
 - Policy SP8: Employment
 - Policy SP11: Design
 - Policy SP12: Conservation
 - Policy SP13: Open Space and Biodiversity
 - Policy SP14: Culture and Leisure
 - Policy SP15: Health and Well-being
 - Policy SP16: Community Facilities

Saved Policies of the Haringey Unitary Development Plan (2002)

- Policy EMP5: Promoting Employment Uses
- Policy EMP4: Non-employment generating Uses
- Policy CLT4: Hotels, boarding houses and guest houses
- Policy CSV4: Alterations and Extensions to Listed Buildings
- Policy CSV5: Alterations and Extensions in Conservation Areas
- Policy CSV7: Demolition in Conservation Areas
- Policy UD3: General Design Principles
- Policy OS8: Heritage Land

National Planning Policy and Guidance

- 7.9 National planning policy is set out in the National Planning Policy Framework (NPPF) which was adopted on 27 March 2012. The NPPF establishes overarching principles of the planning system, including the requirement of the system to *“drive and support development”* and supports *“approving development proposals that accord with the development plan without delay”*. There is also a *“presumption in favour of sustainable development...[which] should be seen as a golden thread running through both plan-making and decision-taking”*.
- 7.10 The NPPF focuses on the delivery of sustainable development. In particular, the core planning principles include, amongst others, to *“drive and support development”*. In determining planning applications, the NPPF acknowledges that the planning system is plan-led, and that Local Plans should be the starting point for the determination of any planning applications.
- 7.11 With regard to this application, the NPPF at section 1 sets out the importance of a strong and competitive economy with paragraph 19 setting out that the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth.

- 7.12 Throughout the NPPF the need to deliver housing in line with demand and consequently significantly boost the supply of housing is set out. Specifically in paragraph 49 guidance sets out that applications should be considered in the context of the presumption in favour of sustainable development.
- 7.13 At Section 12 Conserving and Enhancing the Historic Environment, sets out the Government's overarching planning policies put in place to conserve the historic environment and heritage assets. It outlines a balanced approach to the conservation of the historic environment. A more detailed review of the heritage and conservation related policies of the NPPF are set out at paragraphs 11.13-11.20 of this report.

Supplementary Planning Documents and Guidance

- 7.14 There is a range of local planning guidance that would be used alongside the aforementioned documents to help determine the application. These include the:

Regional

- Draft Interim Housing Supplementary Planning Guidance (May 2015)
- London View Management Framework (2011)
- London Planning Statement (May 2014)
- Shaping Neighbourhoods: Play and Informal Recreation SPG (2012)
- Sustainable Design and Construction SPG (April 2014)
- Social Infrastructure SPG (May 2015)

Local

- Sustainable Design and Construction SPD 2013
- Design Guidance SPG 1a 2006
- Conservation and Archaeology SPG 2 (DRAFT 2006)
- Shopfronts, Signage & Security SPG 6a (DRAFT 2006)
- Advertisements SPG 6b (DRAFT 2006)
- Vehicle and Pedestrian Movement SPG 7a (DRAFT 2006)

Emerging Planning Policy

- 7.15 In addition to adopted planning policy and guidance, regard has been had to emerging policy, as identified above. The most significant emerging policy documents are:
- Proposed Alterations to Haringey's Adopted Strategic Policies
 - Development Management Policies DPD
 - Site Allocations DPD
- 7.16 LBH are proposing a further round of consultation on the 'soundness' of the documents in September 2015 prior to their review by the Secretary of State and formal adoption. Consequently, we do not anticipate that these documents will be adopted prior to the application being determined.
- 7.17 Where relevant, guidance documents and incoming policies have been referred to in Section 7 of this Statement and in the relevant supporting documents which accompany the application.

Weight Accorded to Policy

- 7.18 With regard to the weight to be attributed to the policy above, it is our view that the development plan, comprising the London Plan and the Core Strategy is up-to-date (within the meaning of the NPPF paragraphs 210 to 215).

8 THE PRINCIPLE OF DEVELOPMENT AND REGENERATION

Overarching Priorities for Sustainable Development and Growth

NPPF

- 8.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to “drive and support development” and supports “approving development proposals that accord with the development plan without delay”. There is also a “presumption in favour of sustainable development...[which] should be seen as a golden thread running through both plan-making and decision-taking”.
- 8.2 The NPPF has 12 core planning principles that should underpin the decision-making process. In particular, planning should ‘proactively drive and support sustainable economic development to deliver the homes, business, infrastructure and thriving local places that the country needs’ by seeking to ‘identify and then meeting the housing, business and other development needs of an area, and respond to wider opportunities for growth’.
- 8.3 The NPPF also 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.

Regional Objectives for Growth at Tottenham

London Plan

- 8.4 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).
 - 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).

Upper Lea Valley Opportunity Area Planning Framework

- 8.5 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. In particular, the section relating to Tall Buildings highlights that the Mayor will promote the development of tall building where they create attractive landmarks enhancing London’s character and help to provide a catalyst for regeneration.
- 8.6 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 areas, the OAPF highlights that their impact on conservation areas and listed buildings will be limited.

The 2011 Riot Report “It Took Another Riot”

8.7 Following the riots that affected Tottenham in 2011, Sir Stuart Lipton was appointed by the Mayor of London in December 2012 to chair an independent panel of experts to assess the drivers and influences of the riots.

8.8 The Report focusses on ten recommendations in order to provide prosperity for Tottenham including a programme of regeneration. In particular, it focusses on tackling the housing deficit and overcrowding and re-imagining the built environment within Tottenham.

8.9 The Vision as set out within the Report states:

“The state of the built environment can easily be improved with a fresh focus on planning enforcement, combined with a will and an appreciation that a smoother process to granting planning consents would help serve to encourage investment into the area.

Commercial property regeneration has been minimal, and, if encouraged, could refresh some of the more tired facades along Tottenham’s main streets.”

8.10 Additionally, the Report highlights the need for an improved transport system which will allow easier travel running between East and West as well as improvements to tube stations and more frequent services to the main overground services.

8.11 Specifically, the Report applauds Tottenham Hotspur Football Club for remaining in the area which has helped to give Tottenham global recognition. In particular, it states:

“The decision to redevelop White Hart Lane is a strong sign of confidence in the area. It carries significant regeneration potential with the promise of new housing and retail units that bring jobs, as well as the opportunity to serve as a catalyst for wider change in the area. Public realm improvements, estate renewal and a new railway station are all critical to capture the benefit of this investment. We look forward to a new vision for developments around the approved stadium, incorporating high quality architecture, greater density, and more retail units adjoining the new Sainsbury’s supermarket site, providing even more local jobs. The listed buildings adjacent to the stadium need to be reconsidered in light of whether they will make a positive contribution to the area and its future. In our opinion they should be demolished if an appropriately designed new building can be shown to improve the setting of the stadium.”

Local Objectives for Growth at Tottenham

Haringey Local Plan

8.12 Haringey’s Local Plan Strategic Policies document (2013) 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.

8.13 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 with the Local Plan which specifically highlights capacity for further growth.

8.14 The Local Plan sets out the future aspirations for Northumberland Park including the proposed redevelopment of the Football Stadium which is considered to provide opportunities for the local community whilst providing regeneration benefits. The Site is noted for future redevelopment to provide a mix of land uses. These land uses will be developed further through the emerging Tottenham Area Action Plan.

The Physical Development Framework for Tottenham (2012)

8.15 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. 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.

8.16 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.

The Tottenham Strategic Regeneration Framework (2014)

- 8.17 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.
- 8.18 The SRF highlights that the Football Club along with regeneration proposals for High Road West are undergoing significant change to create new residential neighbourhood supported by leisure and commercial developments.
- 8.19 This document, alongside the PDF, has been used to inform the emerging Tottenham Area Action Plan which is discussed below.

Emerging Tottenham Area Action Plan

- 8.20 The emerging APP notes that Tottenham is a key regeneration area in London and due to the opportunities for growth as well as concerns for change, it has been identified as a priority area.
- 8.21 The Site is included as a site allocation within the emerging AAP (NT3 – High Road West) and has its own site allocation (NT5 – Tottenham Hotspur Stadium). These are discussed in turn below.

NT3 – High Road West

- 8.22 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.

- 8.23 The site requirements as set out within the AAP states that there will be:
- A minimum of 1,400 new home with a mix of tenure, type and unit size;
 - Creation of a new connection between White Hart Lane 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

NT5 – Tottenham Hotspur Stadium

- 8.24 This site allocation has been identified for the redevelopment of 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.
- 8.25 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.

Evaluation of the Principle of Development

- 8.26 The proposals fully accord with current and emerging planning policy and guidance. The NPPF, London Plan, Haringey's Local Plan and emerging Tottenham AAP seek to ensure that development is of the highest quality whilst guaranteeing that the proposals will complement the local context including improvements to public transport accessibility and public realm as well as supporting the wider regeneration objectives for Tottenham. As such, it is considered that the proposals and scale of development achieves the most efficient and effective use of land.
- 8.27 Additionally, the Upper Lea Valley OAPF produced by the GLA covers four London boroughs of which one is London Borough of Haringey. The OAPF states that the Mayor will promote the development of tall buildings which are substantially taller than their surroundings in well-defined clusters identified for urban growth including around

Tottenham Hotspur's new Stadium. It is therefore considered that the proposals and scale of development achieves the most efficient and effective use of land.

- 8.28 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.
- 8.29 The proposals will act as a draw by creating a destination for the local community as well as visitors from further afield due to the proposed uses on site.
- 8.30 The Development will not only deliver a world class stadium but will also deliver a large number of new high quality homes which will be set within a high quality landscaped environment surrounded by commercial, leisure and community uses. Huge improvements will also be made to the public realm which will surround the proposed stadium.
- 8.31 The proposals are considered to respond positively to the main theme of sustainable development within policy and seeks to comprehensively redevelop the Site to act as a catalyst for wider regeneration within Tottenham.
- 8.32 The principle of the mixed use development is considered to comply with relevant planning policy for the following reasons:
- National planning policy promotes regeneration of urban brownfield sites to assist in the delivery of mixed and balanced communities. In particular, the proposals will result in not only much needed housing to be brought forward within Tottenham but also bring about wider public and community benefits.
 - The delivery of significant economic growth and new housing will be closely linked with the wider regeneration aspirations for the area. The London Plan sets housing targets for each London borough and the proposals will go some way in meeting this target. 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 is designated as suitable for significant redevelopment within local planning policy 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.

9 SITE SUITABILITY AND LAND USE

9.1 This section assesses the Site's suitability for the range of proposed uses set out in Section 5. This assessment discusses the principle of these uses whilst specific design considerations are discussed in the following chapter.

9.2 The uses assessed in this section include:

- The Stadium and Extreme Sports Building (Use Class D2);
- The Tottenham Experience (Sui Generis);
- The Hotel (Use Class C3);
- The Flexible Business and / or Community Space (Use Class D1/D2); and
- The Community Health Centre (Use Class D1).

THE STADIUM AND EXTREME SPORTS CENTRE (USE CLASS D2)

9.3 The delivery of the new stadium and associated Extreme Sports building at the NDP site is fully supported by development plan policy.

9.4 The site benefits from a site-specific designation (SSP13) in the Haringey UDP that provides for the expansion of the stadium, including better facilities and associated mixed use development. Furthermore, the principle of the use of the NDP site to accommodate a new stadium and associated sports facilities that fall within the D2 use class is already established as acceptable in planning policy terms through extant planning permissions (ref: HGY/2010/1000 and HGY/2011/2351), and this must be a key consideration. Indeed, these uses form part of a new policy site allocation within the draft Tottenham Area Action Plan that is shortly to be subject to a Regulation 19 statutory period of consultation and demonstrates Haringey Council's commitment to securing these uses on the site.

9.5 The principle of the D2 uses, which are town centre uses as defined by the NPPF, also accords with London Plan Policy 4.6. The NDP 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. Furthermore, the leisure uses will be accessible to all members of the community, with programmes and initiatives to be delivered that focus on key hard to reach groups.

9.6 To the extent that the sequential test applies in relation to the non-stadium leisure uses, it is considered that the current site is the only site available that could accommodate the proposed development. The leisure uses form a key part of the Club's brief for the site, with the Club committed to delivering a sports focussed development that will improve access to sporting facilities for the local community and accords with UDP SSP13.

9.7 With regard to the matter of impact as outlined in London Plan Policy 4.7, should that be deemed relevant, it is a key consideration that the current proposals provide for up to 2,000 sqm of D2 leisure floorspace (excluding the stadium), which falls within and below the quantum of approved leisure floorspace already consented through the extant planning permission for the Southern Development (ref: HGY/2011/2351).

9.8 Importantly, the leisure element of the development will assist with achieving several key objectives that lie at the heart of the Haringey Local Plan; those being:

- To 'safeguard and foster the borough's cultural heritage (Policy SP15);
- To 'safeguard and foster the borough's recreational and sporting facilities (Policy SP15); and
- To 'improve the health and well-being' of the borough's residents (Policy SP14).

Safeguarding and Fostering Tottenham's Cultural Heritage

9.9 The Haringey Local Plan recognises the significant cultural value of Tottenham Hotspur Football Club to Haringey, with the Club having been located at White Hart Lane for over a century and 'the stadium forming an established part of that landscape that gives identity to Tottenham' (paragraph 3.1.25). On this basis, the Local Plan identifies the Club as one of the principal cultural attractions in the borough, and identifies the potential to develop the site as the 'Tottenham Hotspur Cultural Quarter' (paragraph 7.2.10).

- 9.10 The proposals to increase and improve the capacity and quality and range of facilities at the stadium will help to safeguard the Club's long-term future on the NDP site, and will ensure that the single most significant cultural element that gives Tottenham its identity is secured for many years to come. The application proposals to safeguard and enhance the home of Tottenham Hotspur Football Club is one of the borough's key cultural attractions, and is therefore compliant with Local Plan policy SP15(3).

Safeguarding and Fostering Recreational and Sporting Facilities and Improving Health and Well-being

- 9.11 With regard to the leisure focus of the stadium and Extreme Sports Centre uses, the development will help to significantly enhance and improve access to much needed sporting and recreational facilities in the Tottenham area, in accordance with Local Plan Policy SP15. 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.
- 9.12 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, providing access to Extreme Sports infrastructure not otherwise available in Tottenham.
- 9.13 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. These elements have been designed so that they can operate as a single sports destination.
- 9.14 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 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.
- 9.15 Given the chronic health inequalities in Tottenham, which performs as one of the worst in the borough and London as a whole, the delivery of new sporting and recreational facilities, with a commitment to provide access to local residents, is a very substantial public benefit.
- 9.16 Overall, it is considered that the long established use of the site as the home for Tottenham Hotspur Football Club, and the provision of an Extreme Sports Centre is consistent with London Plan Policy 4.6 and Haringey Local Plan Policies SP14 and SP15, and the principle of these D2 land uses therefore complies with policy.

TOTTENHAM EXPERIENCE (*SUI GENERIS*)

- 9.17 The Tottenham Experience will house a variety of uses within a single building, including the Club's 'megastore', museum, café, cinema, ticket offices and the reception and changing areas for the Skywalk, all of which individually are classed as town centre uses. However, for planning purposes, the use of the Tottenham Experience is defined as sui generis. The multi use nature of the building does not fall within any of the defined use class categories. The uses and layout of the building, which is wholly interconnected, will create a single planning unit.
- 9.18 Notwithstanding the above, the principle of the various land use components within the Tottenham Experience are already deemed acceptable in planning policy terms.
- 9.19 With regard to the retail element of the Tottenham Experience, the site benefits from a site allocation in the Saved UDP under SSP13. This allocates the site for a range of uses including retail so the retail use is therefore acceptable in planning policy terms.
- 9.20 The museum and cinema uses are ancillary to the main function of the Stadium, with the museum floorspace and the cinema being used to showcase the Club's history and forming a key component of the stadium tours. The Saved UDP Site designation SSP13 allocated the site for expansion of the stadium with 'enhanced facilities'. The museum and cinema space will form part of the Stadium's enhanced facilities, and are intrinsically linked to the operation of the Club.
- 9.21 As such, it is considered that the proposed the Tottenham Experience (Sui Generis) are acceptable in this location and therefore accord with planning policy.

HOUSING (USE CLASS C3)

- 9.22 The delivery of new housing is one of the Government's key priorities. In the HM Treasury's recent announcement on 10th July 2015 "Fixing the Foundations – Creating a More Prosperous Nation", the Government recognises that the UK 'has been incapable of building enough homes to keep up with growing demand. The statement recognises that this "in turn has harmed productivity and restricts labour market flexibility, and it frustrates the ambitions of thousands of people who would like to own their own home"'.
- 9.23 The Government's objective to increase housing is already firmly established in the NPPF, which confirms the Government's objective for housing, which is to boost housing delivery (Paragraph 47) and deliver a wide choice of high quality homes, to widen opportunities for home ownership and to create sustainable, inclusive and mixed communities (Paragraph 50).
- 9.24 The London Plan recognises a pressing need for more homes. These homes will promote opportunity and provide a real choice of housing for residents in order to meet their needs. The Development seeks to maximise the amount of housing potential on the Site and will therefore contribute to LB Haringey's annual and minimum ten year target for new housing in accordance with London Plan Policy 3.3. Table 3.1 of London Plan Policy 3.3 states that Haringey Council should target 1,502 homes per year between 2015 and 2025 with a minimum target of 15,019 for this period. Part D of London Plan Policy 3.3 requires Haringey Council to exceed this minimum annual housing target.
- 9.25 The Upper Lea Valley Opportunity Area Framework also promotes housing growth within Tottenham, with the objective to deliver over 20,100 new high quality homes within the Upper Lea Valley by 2031.
- 9.26 Policy SP2 of the Local Plan relates to housing and sets out the Council's aims for provide homes to meet the growing housing needs which is a key priority for Haringey.
- 9.27 The site is also designated in the Saved UDP as site SSP13, which is allocated for residential use. It also benefits for extant planning permission to deliver 285 residential units (HGY/2011/2351).
- 9.28 The provision of up to 585 residential units will make a much needed contribution to regional, sub-regional and local housing need. The principle of providing new residential uses on the application site is therefore in accordance with the NPPF, London Plan Policies 3.3, 3.7, Local Plan Policy SP2 and Saved UDP Site allocation SSP13.

Affordable Housing

- 9.29 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.
- 9.30 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".
- 9.31 Haringey Council's own affordable housing policy requires relevant schemes to provide 50% affordable housing on a habitable room basis, subject to viability.
- 9.32 The maximum reasonable amount of affordable housing that can be delivered by the proposed development, in the context of the above policy considerations, has been assessed by the Applicant based on an analysis of viability. The viability development appraisal will be made available to the Council during the application process and it is understood that Haringey Council will appoint independent consultants to advise on matters of viability and to undertake an independent review of the Club's viability analysis.

HOTEL (USE CLASS C1)

- 9.33 The Development comprises 18,820 sqm (GIA) of hotel floorspace which will include 180 hotel bedrooms along with 49 serviced apartments.
- 9.34 The proposed hotel will support and stimulate the growth of London's visitor economy as well as improving the range and quality of provision available to visitors. The hotel accords with Policy 4.5 of the London Plan which seeks to achieve an

increase of 40,000 net additional hotel bedrooms by 2036. This figure was produced by the Accessible Hotels in London Report produced by Grant Thornton for the Greater London Authority in 2010. The Report notes that by 2016, London will be recognised as a leading global city for tourism and a constantly evolving destination. As a result, the number of visitors spending the night the London is likely to grow by 46% over the 2008-2031 period. The Report concludes that tourism is a key strength of the London economy resulting in hotels remaining a popular form of accommodation for tourists using them for both business and holidays.

- 9.35 The hotel is considered to be appropriate in this location as it is related to a major visitor attraction in the form of the stadium, which is recognised in the Haringey Local Plan as being one of the borough's principal visitor attractions, which accords with London Plan 4.5.
- 9.36 Saved UDP Policy CLT4 relates to proposals for hotels. It requires that proposals do not result in the loss of housing stock, that they should be located within a town centre or served well by public transport and that it does not have an adverse impact on the amenity of nearby residential properties or other uses. The proposed hotel use will not result in the loss of any existing housing stock; it will be well served by public transport with forthcoming station and service upgrades at White Hart lane and Tottenham Hale stations; and importantly, as demonstrated in the supporting Environmental Statement, the proposed hotel will not result in any significant adverse impacts on neighbouring amenity.
- 9.37 Furthermore, the proposed hotel use accords with the Saved UDP site allocation SSP13, which provides for hotel uses. This is consistent with the extant planning permission (HGY/2010/1000) that confirms the acceptability in planning terms of accommodating a hotel on this site.
- 9.38 The proposals for serviced apartments complies with Policy 4.5 which recognises the need for new visitor accommodation.
- 9.39 It is considered that the proposed hotel use and associated serviced apartments are appropriate uses in this location, benefiting from specific site allocation for such a use, and it therefore accords with London Plan Policy 4.5, and Saved UDP Policies CLT4 and SSP13.

FLEXIBLE BUSINESS (USE CLASS B1) AND / OR COMMUNITY (USE CLASS D1/D2) FLOORSACE

- 9.40 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 flexibility is therefore sought for the space to be used for either, or a combination of, office (Use Class B1) and community (Use Class D1/D2) 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.
- 9.41 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.
- 9.42 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.
- 9.43 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 strengthened by this development.

- 9.44 Should the flexible space be occupied by D1/D2 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.
- 9.45 It is considered that the 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 in the London Plan and the Haringey Local Plan and Saved UDP Policies.

COMMUNITY HEALTH CENTRE

- 9.46 The provision of a new community health centre in the north of the site is intended to serve the needs of the existing and future residents in and around the site. As identified in paragraphs 9.11 – 9.16 above, 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 (paragraph 7.1.13).
- 9.47 Haringey Council is committed to supporting the provision of additional health facilities and will ensure that the borough has a necessary supply and distribution of premises to meet the health care needs of the borough.
- 9.48 The Club is fully committed to delivering a very much needed community health centre, including GP facilities and other health-related services, as part of the NDP development and it is intended that the health centre will be delivered as part of the first phase of development. This early delivery of new health infrastructure will be
- 9.49 The provision of a new community health centre, as part of the early phase of the NDP development, fully accords with Local Plan Policies SP14 and SP16 and will be a significant public benefit.

10 DESIGN MATTERS

- 10.1 This Section should be read in conjunction with a number of other application documents which include:
- Design and Access Statement
 - Residential Design Code Document
 - Parameter Plans
 - Environmental Impact Assessment – Landscape and Visual Impact Assessment
 - Heritage Impact Assessment
- 10.2 These documents provide a detailed analysis of the Development and justify the Development against planning policy. The Design and Access Statement and Design Code specifically contain the key guiding principles.
- 10.3 This section assesses the development in terms of:
- Design
 - Housing density
 - Housing Design Standards
 - Townscape
 - Public Realm, Open Space and Amenity
 - Energy

Design

- 10.4 Achieving high quality design is a key planning policy objective at a national, regional and local level and has played a vital part in the overall design philosophy of the Development. The Development has also undergone rigorous and extensive pre-application discussions with the Council's Planning and Design Officers as well as the Council's Quality Review Panel prior to submission, and has been subject to review with the GLA.
- 10.5 As outlined earlier, the residential component of the Development is submitted in outline with matters relating to "appearance" and "landscape" reserved for approval at a later stage. To ensure commitment to delivering a high level of design quality, the application is submitted with a Residential Design Code that will establish a series of design parameters that any subsequent reserved matters application will need to comply.
- 10.6 The NPPF specifies that good design is a key aspect of sustainable development and therefore contributes to making places better for people. The NPPF promotes the importance of planning decisions addressing the connection between people and places and the integration of new development into the natural, built and historic environment. As such, it is encouraged to give significant weight to outstanding or innovative designs which help raise the standard of design more generally in the area.
- 10.7 Specifically, the Development has been designed to ensure the future viability of the area by improving the characteristics. In accordance with the design principles set out in the NPPF (Paragraph 58), the Development will:
- Function well by refining the overall quality of the area both for short term and long term gain.
 - Create an attractive and comfortable place to live, work and visit through establishing a sense of place through high quality designed buildings and streetscapes.
 - Make the most out of the Site through optimising the development potential by providing an appropriate mix of uses as well as improved public open spaces and landscaping.
 - Respond to the local character of Tottenham and reflect upon its vast history to maintain its identity through the use of appropriate materials and utilising innovative design.
 - Create safe and accessible environments by reducing crime and disorder and enhance community cohesion and the quality of life for existing and future residents.
 - Create a visually attractive scheme through good architecture and appropriate landscaping.

- 10.8 The design for all aspects of the scheme is considered to be of the highest quality, with world leading architects Populous and Allies and Morrison taking designing the sports related and residential elements of the Development respectively. The design will improve the character and quality of the area and the way it functions in line with the aims of the NPPF.
- 10.9 One of the key principles of the design is that the buildings are relatively tall and large for their context. London Plan Policy 7.7 relates to the location and design of tall and large buildings and establishes criteria that must be met to ensure larger buildings are compatible and acceptable in their context. The Development seeks to deliver varied building typologies and respond to the opportunities to accommodate a cluster of tall buildings in line with the Upper Lea Valley OAPF Policy 4.2.
- 10.10 It is considered that the Development complies with Policy 7.7 of the London Plan, Policy SP11 of the Local Plan and the general design principles set out in Policy UD3 of the saved UDP for the following reasons:
- The Site is located within the Upper Lea Valley Opportunity Area identifies the NDP sit as suitable for a tall buildings cluster due to its location at the base of the valley therefore limiting, the impact on conservation areas and listed buildings. The supporting Heritage Assessment and the Environmental Statement demonstrate that overall the height and scale of the proposed buildings have a limited impact on the local conservation areas and listed buildings, and in many instances result in enhancements to the heritage assets.

The Site is also considered appropriate for tall buildings due to the highly accessible location to support higher development capacity. The surrounding area is in need of significant regeneration in light of the response to the 2011 riots coupled with the need to address the social deprivation in the surrounding area. As such, it is considered that the character of the area will not be adversely affected by the scale, mass or bulk of the Development.
 - The Development will relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm. Indeed, the principle of the scale of larger buildings and the form on the site was established through the previous consent, where Haringey Council considered the proposed siting of the stadium as 'optimal', and forming an 'integral part of the urban fabric'. The Council concluded that the stadium was of an appropriate size and form. Indeed the size, scale and character of the proposed stadium, by way of its use, is considered appropriate as it dictates a visible presence along the High Road and further afield. The principle of larger scale that the surrounding context to the south of the site was also considered acceptable.
 - The proposed buildings, which are read as a group, significantly improve legibility of the site and surrounding area. As demonstrated through the supporting documents, the height and layout of the taller elements have been designed to create both create landmark gateways into this regeneration area and provide a focal point to assist with north-south and east-west legibility. Importantly, the introduction of new architecture of the highest design quality within this part of the London skyline will help to change and drive perceptions of the area, signifying Tottenham's new future as place to live, work and invest.
 - The Design and Access Statement and Design Code submitted with the application demonstrate the highest standards of design, architecture and materials. Tottenham Football Club have had the opportunity, since obtaining the previous planning permission, to review the design of the stadium and the proposed surrounding buildings which now address the townscape and the setting of the conservation area in a sensitive manner. The high standard of design will also ensure the longevity of the Development allowing for wider benefits to occur within Tottenham.
 - The proposals also incorporate active uses at ground floor level. Importantly, the stadium will remain active, not only on match days but throughout the year with the addition of other ancillary uses such as conferencing and banqueting. The other proposed uses will also act as a draw for the local community. The areas surrounding the stadium will be remain active with the hotel, Tottenham Experience, Extreme Sports Centre, flexible office and community uses within the podium to the south, the residential dwellings and community health centre.
 - The Development will contribute to improving the permeability of the site and surrounding area. In particular, movement and connectivity between east and west will vastly improve, connecting High Road West with Northumberland Park. Additionally, the Development will deliver publicly accessible spaces that will be integrated within high quality landscaping to ensure that the site both remains active during non-match days and provides a community benefit to residents..
 - Overall, the Development will bring about significant regeneration benefits for the local area. The supporting uses for the stadium will act as an important draw to the site. Indeed, the Football Club is recognised as the most important asset that Tottenham has where is has been for a number of years having never moved from its original site. The scheme is considered to act as a catalyst for not only the regeneration of the High Road but also the wider area.
- 10.11 The Development will also ensure that the impacts on health, climate change, natural resources and biodiversity are minimised. This will be maintained through the sustainable design approach which is set out in the Design and Access Statement, Residential Design Code and the ES.

- 10.12 The design of the Development is well considered and relates well to the site's existing context and the overarching ambitions for the NDP site and the wider regeneration area. It is considered to comply with planning policy for the following reasons:
- It has been designed to an appropriate scale and density for its location.
 - It creates strong, legible and logical connections for the Site and to the wider area.
 - It accommodate a range of uses in an appropriate form which will contribute to a successful and vibrant place.
 - It provides high quality open spaces including pedestrianised areas.
 - It provides active ground floor uses and private entrances to the residential towers and town houses.
 - It creates stronger entrances and paths to the Site and new vistas and views.
- 10.13 Accordingly, it is considered that the Development accords with London Plan Policies 3.5, 3.6, 3.7, 7.2, 7.4 to 7.8 and 7.12, Local Plan Policies SP0, SP2 and SP11, saved UDP Policy UD3 and guidance set out within the Design SPG and Sustainable Design and Construction SPD.

Housing Design Standards

Density

- 10.14 Planning policy on a regional and local level requires an efficient use of land, particularly in respect of key urban sites. The proposed development has been optimised as a response to planning policy, both in terms of its design and its ability to meet the increasing housing growth demands of Tottenham and wider London.
- 10.15 Planning policy at the regional Level in the form of the London Plan at 2.13 and the Upper Lea Valley OAPF seek to maximise the density of development with Opportunity Areas.
- 10.16 The Development will deliver 585 new homes which is considered to be one of the major benefits of the overall scheme and accords with London Plan Policy 3.4 in optimising housing potential and SP2 of the Local Plan.
- 10.17 The density responds to the changing regeneration context within this part of Tottenham, with Haringey Council and the GLA working in partnership to secure Housing Zone 2 status for the area. This will require the accelerated delivery of housing growth in the area and will require each and every site to maximise and optimise the density of housing, subject of course to there being adequate provision of services and facilities. A key consideration when assessing the density of the Development is that in combination with the residential, a new community health centre catering for extended GP services will be provided as well as sports and recreational facilities to meet the needs of the new community created as part of Development as well as the needs of the existing residents in the area.

Housing Standards

- 10.18 At the time of this application, the Mayor of London recently published the Draft Interim Housing Supplementary Planning Guidance (SPG). This went out to public consultation for a period of 12 weeks from 15 May to 7 August 2015. The draft guidance seeks to provide revised guidance on how to implement the housing policies in the London Plan. In line with London Plan Policy 3.5, the housing standards will apply to residential dwellings. As such, the proposed dwellings have been assessed against the London Plan, Housing SPG (2012) and Draft Interim Housing SPG (2015).
- 10.19 The proposed residential dwellings will be built to Lifetime Homes Standards with a minimum of 10% wheelchair accessible units which is accordance with London Plan Policy 3.8, the Mayor's Housing SPG, Draft Interim Housing SPG and Local Plan Policy SP2.
- 10.20 In respect of residential amenity, the dwellings will be built to ensure adequate levels of daylight, sunlight and privacy for future occupiers and those already living in the surrounding area in line with London Plan Policy 7.6. The Mayor's Draft Interim Housing SPG notes that where guidelines for daylight and sunlight impacts should be applied sensitively to higher density developments where local circumstances should be taken into account in order to maximise housing capacity. As such, fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced.

- 10.21 Future occupiers will have access to private amenity space of at least 5 sqm in the form of balconies as well as the publically accessible amenity space which will be located on the podium. The proposals also comply with the Draft Interim Housing SPG for private open space standards as the balconies will have a minimum depth of 1500mm.
- 10.22 It is considered that the proposed residential dwellings comply with the standards including floor to ceiling heights, dwelling space and storage standards, play space and private amenity space set out within the London Plan, Housing SPG and Draft Interim Housing SPG.

Townscape

- 10.23 A full assessment of the impact of the Development on the surrounding townscape character and views forms Volume 3 of the Environmental Statement (ES). The assessment ensures that the appropriate design quality and public realm contribution is embedded in the design principles to support the inclusion of these elements within the Development.
- 10.24 The assessment has been undertaken by the Landscape Partnership and assess the detailed scheme proposals as well as the parameter plans, having regard to the Design and Access Statement, Residential Design Code and verified images. The assessment assesses the impact of the Development on the overall townscape character and on identified views.
- 10.25 The assessment concludes that the Development has been designed to respond positively to the existing townscape including local conservation areas, listed buildings and undesignated heritage assets close to the site. The potential for adverse impacts has been considered throughout the design process and have been mitigated through design changes where necessary.
- 10.26 The impact on the local townscape character and the identified viewpoints has been assessed and the impacts largely range from major beneficial to moderate neutral / no change. Taking into account the urban design quality assessed against policy criteria and principles that are defined within the parameter plans, the Design and Access Statement and the residential Design Code, none of the impacts are considered to be significantly adverse
- 10.27 The only adverse impacts on townscape character and views arises in the Bruce castle area. The character area defined as Bruce Castle Mixed Open space is identified as having a moderate adverse impact, whilst views 11 and 12 (Bruce Castle Park) as moderate and minor adverse respectively. There was also identified a minor adverse impact from view 10 (Tottenham Cemetery). These minor and moderate adverse impacts are due to presence of heritage assets in the character area and view points, and the impacts on these assets are examined more fully in the Heritage Assessment and the Cultural Heritage Assessment in the ES at Chapter 8.
- 10.28 On balance, it is considered that the Development will result in 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 Development 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
- 10.29 It is therefore considered that the Development fully complies with planning policy, specifically the provisions of the NPPF, London Plan Policies 7.4, 7.8, 7.9, Local Plan Policy SP11.

Public Realm, Open Space and Amenity Space

- 10.30 The Design and Access Statement through the Landscape Strategy sets out the principles and core values for the public realm, open space and public amenity spaces for the scheme.
- 10.31 The public realm is seen as an integral component of the Development, helping to both connect the scheme with the adjoining areas whilst also establishing a new benchmark in the quality of environment that should be expected of other developments as they are brought forward as part of Tottenham's regeneration.
- 10.32 The quality of the public realm at street level is reflective of the quality of design and choice of materials expressed in the architecture of the built form.
- 10.33 A key function of the public realm will be the podium space to the south of the stadium that will serve as multi-use open space and amenity space. This large public space can serve as a key civic space on non-event days, hosting a wide range of

activities. The flexible nature of this space will allow for it to be used for sports activities such as five-a-side football, outdoor performances and exhibition space, as well as providing some tranquil space for peace and relaxation.

- 10.34 The podium space has been designed to both accommodate the pressure of the large numbers of spectators that will arrive and depart on event days but also serve as a space for the local community on non-event days.
- 10.35 The public amenity space provided on top of the plinth at the base of the residential towers is submitted in outline at this stage as it will need to respond to the final design of the appearance and layout of each of the residential blocks. The Design and Access Statement and the Residential Design Code establish design principles to inform the future consideration of this space, with an expectation that the amenity space will be of the highest quality in order to ensure the residential

Energy and Sustainability

- 10.36 An Energy Strategy has been prepared by Buro Happold and is submitted with this planning application. The Energy Strategy establishes the aspirations for the Development in respect of carbon reduction.
- 10.37 Both the London Plan through Policies 5.2, 5.3, 5.6 and 5.7 and the Haringey Local Plan at Policy SP4 seek to reduce carbon dioxide emissions created by development and reduce energy demands. Where feasible, it is anticipated that this should be achieved by connecting developments into district heating / energy networks where they exist. Where mixed use developments are proposed but there is no district network in place, Policy 5.6 of the London Plan outlines a hierarchy of measures that should be pursued.
- 10.38 The supporting Energy Strategy outlines the approach adopted with regard to energy, and provides a commentary on the various options assessed in defining the final strategy.
- 10.39 In line with London Plan Policy 5.6, the first phase of the development comprising the stadium, the Tottenham Experience and the community health centre will be served by a single site-wide energy centre. It is intended that the later phases of the development, comprising the hotel, the Extreme Sports building and the residential will be served by a district-wide energy solution being brought forward by Haringey Council.
- 10.40 The Club is currently working closely with Haringey Council on the delivery of a district energy solution in this part of Tottenham as part of the Council's wider regeneration plans for the redevelopment of the High Road West and Northumberland Park estates on either side of the NDP site. It is envisaged that these sites will deliver in the order of 7,000 new homes over the next 20 years and that these homes will be served by a district energy centre.
- 10.41 The Energy Strategy that supports this application is premised on connecting the development in to a decentralised network once it is delivered. Each component of the Development has therefore been designed to be capable of connecting in to the district-wide solution once delivered. If the District wide solution has not come forward by the time the residential development is delivered, and appears unlikely to come forward in the foreseeable future, consideration will be given to the provision of a single site wide energy centre within this development, subject to detailed feasibility testing. Space is available within the residential component to accommodate a site wide energy centre, which would comply with London Plan Policy 5.6.
- 10.42 Overall, the development complies with the relevant development policies regarding energy and sustainability.

11 Heritage

- 11.1 This Section should be read in conjunction with a number of other application documents which include:
- Heritage Assessment
 - Environmental Impact Assessment – Cultural Heritage
 - Design and Access Statement
- 11.2 These documents, particularly the Heritage Assessment and the Cultural Heritage Assessment at Chapter 8 of the Environmental Statement, provide a detailed and robust assessment of the impacts of the development on the affected heritage assets. This Statement does not seek to duplicate the findings of these assessments but it does draw on their conclusions to inform the overall planning judgement on the acceptability of the Development.
- 11.3 Unlike the other planning matters considered within this Statement, matters relating to heritage need to have regard to the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as the Town and Country Planning Act 1990. For this reason, the decision-making framework that applies to the assessment of heritage matters is briefly summarised below, followed by an assessment of the heritage impacts of the Development.

Decision Making Framework

- 11.4 In assessing the impacts of the Development on heritage assets, there are both legal and policy tests that will need to be applied by the decision maker as set out below.

The Statutory Duties

- 11.5 The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Act”) is the legislative basis for decision making when determining planning applications that relate to the historic environment. Sections 66 and 72 of the Act impose a duty upon local planning authorities to consider the impact of proposals upon listed buildings and conservation areas.
- 11.6 Section 66(1) of the Act states:
- “In considering whether to grant planning permission 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”*
- 11.7 Section 72 (1) Act states:
- “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 of appearance of the area”*
- 11.8 Recent judgements have provided detailed consideration of this duty imposed on local planning authorities. The Court of Appeal in Barnwell Manor held that the effect of the statutory duty imposed a “strong presumption” against granting planning permission or listed building consent where an application would cause harm to a listed building (its setting) or a conservation area.
- 11.9 The High Court in Forge Field judgment held that the “strong presumption” against granting consent will apply where the decision maker finds that the harm to the listed building (its setting) or the Conservation Area is substantial or less substantial.
- 11.10 This is the current law although the issue will be reconsidered by the Court of Appeal on the appeal of the decision of the High Court in Mordue v Secretary of State for Communities and Local Government 920150 EWHC.
- 11.11 For the purposes of this planning and listed building consent application, the effect of the statutory duty and case law means that if there is considered to be any harm of any degree caused to any designated heritage asset the starting point for Haringey Council in the determination of the applications must be to apply a strong presumption against the grant of permission or consent.
- 11.12 However a decision maker may lawfully grant planning permission or listed building consent where it considers, having properly applied the strong presumption, that the presumption is outweighed by other factors, for example substantial public benefits.

The Policy Tests

- 11.13 One of the core principles of the NPPF is to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 11.14 In determining applications local planning authorities are required to take account of significance, viability, sustainability and local character and distinctiveness. Paragraph 131 of the NPPF identifies the following criteria in relation to this:
- ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - the desirability of new development making a positive contribution to local character and distinctiveness.’
- 11.15 In assessing the degree of ‘harm’ to the significance of a designated heritage asset caused by an application, paragraph 132 states that *‘...great weight should be given to the asset’s conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.’*
- 11.16 Paragraph 133 of the NPPF states *“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 is necessary to achieve substantial benefits that outweigh that loss”*
- 11.17 Paragraph 134 of the NPPF states *“Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”*.
- 11.18 In relation to the consideration of applications for development affecting the setting of a designated heritage asset, paragraph 137 of the document states the following: *‘proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably’*.
- 11.19 In terms of non-designated heritage assets, the NPPF states: ‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balance judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’ (paragraph 135).
- 11.20 With regard to the loss of a building (or other element) which makes a positive contribution to a Conservation Area, paragraph 138 states this should be treated: *‘...As substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area...as a whole.’*
- 11.21 Further relevant policies regarding heritage are set out in the London Plan at Policies 7.8 and 7.9; the Haringey Local Plan at Policy SP12; and the Saved UDP Policies CSV4, 5, 6 and 7.

Assessment of Heritage Impact

- 11.22 The Development will impact both designated and non-designated heritage assets; these being:
- No. 744 High Road ‘Warmington House’, a grade II listed designated asset;
 - No. 746 High Road ‘Edmonton Dispensary’, No.748 ‘The Red House’, and No.750 ‘White Hart Public House’, which are all non-designated assets;
 - The North Tottenham Conservation Area, a designated asset; and
 - Other conservation areas and heritage assets in the wider area, including Bruce Castle, Scotland Green and Bruce Grove Conservation Areas.
- 11.23 The impact of the Development on each of these heritage assets is assessed below, having regard to the policies outlined above.

No. 744 High Road 'Warmington House' (Designated Heritage Asset)

- 11.24 The Development as a whole is considered to have a positive impact on Warmington House.
- 11.25 Its sympathetic conversion and restoration in to a multimedia museum will importantly provide the asset with a viable and sustainable use; helping to secure its long-term future. This is a very significant benefit when taking in to consideration that the asset is currently in a very poor condition and is on Historic England's Heritage at Risk register.
- 11.26 The proposed works to interior and exterior, which will fully restore much of its character and remove any detracting latter additions, will enhance rather than detract from its significance. The internal plan form of the building will be retained which will ensure its significance is retained in the long term.
- 11.27 The development of the Tottenham Experience building will integrate Warmington House within a new terrace that reflects the scale and massing of the listed building but, rather than seeking to replicate the early-19th-century architecture of Warmington House, it is of a high quality and contemporary design that responds to the character of the new stadium. It is considered that sympathetically incorporating Warmington House into a new terraced form would be an acceptable way in which to enhance its setting and breathe new life into the listed building.
- 11.28 It is considered that despite the difference in scale between the proposed hotel and Warmington House, the hotel would not harm the significance of the listed building. This is on the basis that its setting has been entirely altered and has no remaining intrinsic significance. The proposed Tottenham Experience buildings would provide Warmington House with a new coherent setting, inspired by the historic terraced form of the listed building that would both enhance the setting of the listed building and help to visually integrate it with the new design of the larger-scale stadium and hotel.
- 11.29 The stadium building is in the same location and broadly of the same scale and mass as the previously consented stadium that has already been deemed acceptable with regard to its impact on the setting of Warmington House. Importantly, the design of the new stadium ensures that it more positively addresses the High Road and better integrates within the historic streetscape. It is considered that the impact of the new stadium on the setting of Warmington House is acceptable.
- 11.30 It is also considered that proposed new hotel that would sit to the rear of Warmington House would not cause harm to the significance of the listed building, despite the difference in scale. The setting of Warmington House has been entirely altered and has no remaining intrinsic significance. The proposed Tottenham Experience buildings would provide Warmington House with a new coherent setting, inspired by the historic terraced form of the listed building, which would both enhance the setting of the listed building and help to visually integrate it with the new design of the larger-scale stadium and hotel.
- 11.31 Overall, it is concluded that the Development will have a positive impact on the grade II listed Warmington House heritage asset.

No.746 High Road 'Edmonton Dispensary', No.748 'The Red House', and No.750 'White Hart Public House' (Non-Designated Heritage Assets)

- 11.32 The Development proposes the demolition of three locally listed buildings including the former Tottenham and Edmonton Dispensary (746 High Road) the Red House (748 High Road) and the White Hart Public House (750 High Road). These buildings are not statutorily listed but are included on Haringey Council's local list. They are non-designated heritage assets that, although incorporating some detracting elements, currently make a positive contribution to the character and appearance of the North Tottenham Conservation Area (the impact of the removal of these the buildings to the NTCA is examined in detail within this chapter).
- 11.33 To inform the decision of whether the loss of these buildings is acceptable or otherwise in heritage terms, it is necessary to consider the rationale for their proposed loss, which has resulted from extensive assessment and design work undertaken by the Club to address a long-standing and fundamental issue relating to crowd safety on the High Road on event days.
- 11.34 The current stadium (capacity of approximately 36,000) on match days suffers from crowd safety issues caused by the 1.9m pinch point on the High Road pavement in front of the White Hart Public House (750 High Road). Combined with the adjoining Tottenham and Edmonton Dispensary (746 High Road) the Red House (748 High Road), this group of buildings results in a narrow pavement that is not able to safely accommodate the large match day crowds that travel in both north and south movements along the pavement. This pinch point, combined with the very high numbers of spectators, forces

pedestrians to walk within the adjoining southbound bus lane, which is fully operational prior to and during football matches. This problem will clearly be significantly exacerbated with the new stadium increasing the capacity and number of spectators / pedestrians from the current 36,000 seats to 61,000 seats in the event that these buildings are retained.

- 11.35 This crowd safety problem is not a new matter and the Club sought to resolve the problem through its designs for the previously consented stadium proposal. The consented scheme sought to address this crowd flow issue through the creation of a new pedestrian walkway (known as the 'canyon') that would funnel pedestrians from the High Road around the rear of the retained buildings and back on to the High Road. This solution allowed the retention of the three locally listed buildings, with the buildings proposed for reuse for food and beverage uses.
- 11.36 However, in relooking at the stadium design for the reasons set out in Section 4 of this Statement, it became apparent to the Club that the crowd safety solution proposed in the previous consented scheme would not deliver the highest safety and security standards, and subsequently would not deliver the highest quality of experience for visitors demanded by the Club. In reviewing the consented scheme proposals, advice from pedestrian movement experts, Movement Strategies, confirmed that in reality the vast majority of pedestrians on match/event days would not follow the proposed new pedestrian route / 'canyon' around the back of the retained heritage buildings as pedestrians will always seek to use the most straightforward and logical circulation routes and will simply not use the detour option provided behind the retained buildings. Instead, the advice of Movement Strategies is that pedestrians would continue along the main High Road pavement as per the current situation, with spectators regularly moving into the bus lane and road as they seek to gain entrance to the Stadium. The consequence therefore is that the canyon solution proposed as part of the consented scheme would not satisfactorily address the longstanding crowd safety issues and would still result in a safety risk whereby pedestrians would continue to walk within the bus lane prior to a match.
- 11.37 As part of the design process to find a solution to this long-standing problem, the Club undertook a thorough review of the previous scheme designs and explored and assessed all reasonable alternative solutions that retained the locally listed buildings. The solutions assessed ranged from increasing stewarding and policing and the installation of barriers, to more radical solutions that looked at temporary and permanent closures of the highway and the creation of underpasses and flyovers. The findings of this work are included at Appendix 3 in the Crowd Safety Options Appraisal report.
- 11.38 The solution proposed in the current Development requires the removal of the three locally listed buildings to create a wider pavement between the carriageway of the High Road and the edge of the development. The pavement width proposed is considered to sufficient to satisfactorily address the crowd flow issues in this part of the development and would enable the safe and smooth movement of spectators in two directions, without being forced into the roadway or encountering obstruction along the way.
- 11.39 In addition to solving the crowd safety problem, the proposed demolition and replacement of 746-750 High Road would also have a positive impact in townscape terms. Replacing the buildings with the proposed Tottenham Experience 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
- 11.40 Whilst the Development would result in the loss of the three locally listed buildings, it is proposed to retain some of their significance by salvaging artefacts and elements of the building for relocation and/or reuse within the proposed The Tottenham Experience Museum. This could include features such as the shop front of the 'Tottenham and Edmonton Dispensary' and Bill Nicholson's panelled office in the Red House. The local historic significance of the buildings would also be recorded in the form of virtual interactive exhibits in the proposed museum.
- 11.41 Although the demolition of these three buildings would result in the loss of buildings that make a positive contribution to the conservation area, it is considered that the Development as a whole accords with Saved UDP policy CSV7 regarding the demolition of buildings within the conservation area, and paragraph 138 of the NPPF. It is considered that this harm would be 'less than substantial' and would be substantially outweighed by wider public benefits delivered by the Development.
- 11.42 While the demolition of the locally listed buildings would result in some harm to the significance of the NTCA, it is considered that this harm would be 'less than substantial' and would be substantially outweighed by the overall benefits of the proposals that are considered in detail at paragraph 11.55.

The North Tottenham Conservation Area (“NTCA”) (Designated Heritage Asset)

- 11.43 It is considered that the new stadium design that forms the central focus of the Development responds more positively to the character and setting of the NTCA than the already consented stadium proposals. The design of the stadium has been carefully considered to ensure that it would address the High Road more successfully than the consented stadium. In line with this, the stadium footprint has evolved from the oval shape of the consented scheme, which left fragments of negative space along the length of the High Road, to a form that expands to meet, and positively reinforce, the pattern of the surrounding urban fabric. The revised design would also provide a more active street frontage, ensuring that the building has ground level activity and engages with the High Street throughout the year.
- 11.44 As highlighted in 11.29 above, the scale, bulk and mass of the proposed stadium is very much similar to the consented stadium proposals, which has already been judged to have an acceptable impact on the character and setting of the conservation area. With the positive design changes incorporated in to this new design (see Heritage Statement section 4.2.1), it is considered that the impact of the new stadium on the character and setting of the NTCA is acceptable and will not result in any harm to the significance of the NTCA.
- 11.45 The new hotel proposed in the south west of the site will provide a significant new element in the townscape, and it is considered that it will enhance the North Tottenham Conservation Area and wider area, providing a landmark both for the southern entrance to the stadium and to this part of the historic High Road heading north from London. Furthermore, although the hotel building would be visible throughout the conservation area, it would not have a negative impact on the setting of any of the other designated heritage assets in the conservation area. Overall, it is considered that introduction of a landmark tall building adjoining the High Road in the form of the hotel that would complement the design of the stadium and reinforce the building line along the High Road, would have the effect of enhancing the character of the NTCA.
- 11.46 The cluster of taller buildings in the form of the residential blocks in the south east of the site are substantially taller than the surrounding buildings and will be visible from many points in the NTCA. However, it is considered that the impact of the proposed residential towers on the character and appearance of the North Tottenham Conservation Area would be limited by their set-back location at the eastern end of Park Lane. Furthermore, the careful design of the towers, including the light-coloured cladding materials and the chamfered ‘lightweight’ appearance of the upper storeys (controlled by the Residential Design Code), will mitigate their visual impact on the NTCA.
- 11.47 Finally, as identified above, the Development proposes the demolition of the three locally listed buildings at 746, 748 and 750 High Road, which are deemed to make a positive contribution to the character of the area and have individual local historic interest. While the demolition of the locally listed buildings would result in some harm to the significance of the NTCA, it is considered that this harm would be ‘less than substantial’ and would be substantially outweighed by the overall benefits of the proposals that have been set out above.
- 11.48 Overall, it is considered that the impacts of the Development on the character and setting of the NTCA, when taken as a whole, are acceptable and that the Development accords with Saved UDP Policy CSV7 in this regard.

Other Designated Heritage Assets

- 11.49 The impact of the Development on other heritage assets outside of the site and the NTCA have also been assessed. The impact of the proposed stadium development on the wider setting of designated heritage assets further afield would be similar to the impact of the consented stadium development, except that the proposed residential towers and hotel will be more visible in longer views along the High Road and from the Bruce Castle and Alexandra Palace Conservation Area to the west.
- 11.50 Although the proposed taller buildings would be visible in longer views from the Alexandra Palace and Tottenham Cemetery Conservation Areas, it is considered that this would not result in harm to the significance of this areas and their visual impact would be mitigated by distance, the existing urban form and trees lining the High Road.
- 11.51 The impact on Bruce Castle would be similar to the consented scheme; it is considered that both the impact of the consented scheme and the impact of the proposed development would result in some ‘less than substantial harm’ to the wider setting of the Bruce Castle Conservation Area in views from the northern end of Bruce Park. It is also considered that there would be less than substantial harm to Scotland Green and Bruce Grove Conservation Areas arising from the taller elements of the residential towers being visible.

The Heritage Balance

- 11.52 As outlined in the Heritage Statement, the Development would give rise to some limited harm to heritage assets. The demolition of the three locally listed buildings (Nos. 746-750 High Road) is considered to cause harm, albeit 'less than substantial harm' to the character and setting of the NTCA; and there is also considered to be harm arising from the impacts of the Development in views from Bruce Castle Park that impact the wider setting of Bruce Castle Conservation Area, although again the significance of this harm is judged to be less than substantial.
- 11.53 This harm engages the strong presumption in the Planning (Listed Building and Conservation Areas) Act 1990 against the grant of planning permission, and requires considerable importance and weight to be accorded to this harm in making any decision. However, in accordance with the judgement in the Forges Field case, this strong presumption against the grant of permission can be outweighed by material considerations powerful enough to do so.
- 11.54 Now turning to planning policy, on the basis that it is considered the harm caused to the designated heritage assets in the form of the conservation areas is 'less than substantial', the impacts of the Development should be assessed against paragraph 134 of the NPPF. This requires a balancing exercise weighing the public benefits of the proposal against the harm caused.
- 11.55 There are very many substantial public benefits that arise directly from the Development that outweigh the presumption against the grant of planning permission arising from the harm caused to heritage. These public benefits are summarised below:
- The restoration and reuse of Warmington House as a museum space as part of the wider Tottenham Experience building will provide the asset with an optimum viable use that will secure and protect the grade II listed building's long-term future. Whereas the previously consented scheme simply sought to retain the building, this Development now seeks to give the building, which is on the Heritage at Risk register, a viable use as a museum space as part of the Club's visitor experience offer.
 - The overall enhancement to the character and setting of the NTCA, with the Development strengthening the historic High Road frontage, with new and retained buildings reflecting the historic street pattern in the area.
 - The delivery of a new museum for Tottenham that provides the opportunity to showcase the area's historic and cultural heritage. The museum will be a resource for the archiving and deposit of intangible heritage assets as well as other salvaged items from the locally listed buildings at 746-750 High Road, to ensure that the history of Tottenham the place will be celebrated.
 - Significant enhancements to public safety on event days, with the long-standing safety issues associated with the 1.9m pinch point at the front of No. 750 being addressed through the creation of a new 9.5m wide footway.
 - The delivery of a new community health centre as part of the first phase of development will provide much needed new health services and facilities for the residents of Tottenham. This part of Haringey suffers from chronic health inequalities and is recognised by the health authorities as having deficient health care provision. The delivery of a new health medical centre, with dedicated GP facilities, will help to address these health care issues.
 - The new sports and recreation facilities provided through the delivery of the Extreme Sports building, the multi-use activity areas within the podium public space which will host a programme of managed sports and recreational activities for local residents, and the use of the stadium for community sports events will provide increased access to sports facilities and programmes that will help to tackle Tottenham's long-standing health issues, particularly child and adult obesity.
 - The delivery of 585 new, high quality, homes that establish a new community on-site and broaden the quality and attraction of housing within Tottenham. The need to greatly improve and rebalance the housing stock was recognised as one of the key challenges to the securing the regeneration of Tottenham identified in the Panel Report to the 2011 Riots.
 - The Development will create a new world class stadium which given the offering proposed between the football and NFL matches as well as concerts, is expected to rise in popularity and subsequently, result in a higher demand for tickets. The multi-surface which is laid underneath the football pitch, allows opportunity for a multitude of other events to take place bringing with it substantial economic benefits to Tottenham.
 - The Development would significantly enhance the economic prospects of this part of Tottenham, helping to address the economic inequalities of this deprived area. The Development as a whole, will generate:
 - Up to an additional 700 full-time equivalent (FTE) jobs on-site, which is a very significant increase from the previously consented scheme which would 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;

- The residential element itself will generate £7.9m of household spending, much of which will be focussed on the local area;
- The use of the stadium for at least two NFL American football matches per year has 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 8 per year, has the potential to generate up to £12m of additional spend in the area;
- The hotel and serviced apartments has the potential to generate up to £560,000 of additional spend in the area; and
- The Extreme sports Centre has the potential to generate between £200,000 to £2.4m of additional spend in the area.

11.56 Importantly, the Development will transform the fortunes of this part of Tottenham, acting as a catalyst to drive its much-needed regeneration. As identified in the Heritage Statement, many of the historic buildings in the NTCA are suffering from a lack of general maintenance, indicating a lack of viability and a need for investment to secure their long-term futures. It is widely recognised that the Development will help to improve investor confidence in the area through raising values and changing perceptions. This in turn will create the platform to attract investment to the buildings in and around the Development, increasing the likelihood of the many historic buildings along the High Road securing much needed investment. This will transform, in a positive way, this part of the NTCA.

11.57 It is considered that the public benefits outlined above are sufficient to outweigh the less than substantial harm to the conservation areas in accordance with paragraph 134 of the NPPF. Furthermore, it is considered that these public benefits are sufficient to meet the 'exceptional cases' test outlined in Saved UDP Policy CSV7. Also, the Heritage Statement has demonstrated, in accordance with London Plan Policy 7.8, that the heritage significance of the designated assets has been recognised and that the restoration of both Warmington House and the NTCA will act as catalysts for the regeneration of this part of the High Road.

Alternative Assessment of Harm

11.58 In the event that it is considered by others that the harm caused by the demolition of the locally listed buildings results in 'more than substantial harm' to the NTCA, this harm would need to be assessed against paragraph 133 of the NPPF, which provides that permission should be refused unless the substantial harm is necessary (our emphasis) to achieve the substantial benefits.

11.59 As outlined in paragraphs 11.34-11.38, and evidenced in the Crowd Safety Options Appraisal report at Appendix 3, the removal of the locally listed buildings is necessary to address the long-standing crowd safety issues that arise on this stretch of the High Road. Since securing planning permission back in 2011 for the previous stadium scheme, the Club is now aware that the consented scheme design, which relies on the 'canyon' solution to address crowd safety issues, would not be sufficient.

11.60 Furthermore, the proposed solution would also be necessary to deliver the successful integration of Warmington House into the proposed stadium development and consequently provide the 'at risk' building with an optimum-viable use in the form of the museum use. Without the Development as proposed, the future of Warmington House would remain uncertain, similar to its position under the consented scheme.

11.61 Based on the detailed work undertaken to date, the only viable and deliverable option to address the significant safety issues identified is to demolish the locally listed buildings. The removal of these locally listed buildings is necessary to securing these public benefits. On this basis, if it is considered that the loss of the locally listed buildings results in substantial harm, then the Development would comply with the policy test at paragraph 133 of the NPPF.

11.62 Should it be deemed that the Development results in substantial harm and that the harm is not necessary to deliver those public benefits, then it is considered that the overall public benefits that could be delivered by the proposals would be sufficient to outweigh the policy presumption in NPPF paragraph 133 against the refusal of planning permission; even when adopting the statutory duties imposed by Section 66 and 72 of the Planning (Listed Building Consent Application) Act as construed by the Barnwell Manor and Forge Fields cases to apply the strong presumption.

11.63 Overall, it is considered that the impacts of the Development on both designated and non-designated heritage assets are acceptable, whether the harm is deemed to be less or more than substantial. The significant public benefits to be

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delivered by the Development, for the reasons outlined above, are sufficient to outweigh any statutory or policy presumption to refuse planning permission.

12 Transport, Accessibility and Parking

- 12.1 This Section should be read in conjunction with the Transport Assessment and Travel Plan prepared by Tim Spencer and Co. These documents provide a comprehensive review of the Development and a robust assessment of the transportation impacts. The documents also identify any mitigation measures to ensure safe access to and from the site, and circulation within it.
- 12.2 The submitted Travel Plans provide a framework for delivering the vision for sustainable travel in and around the Site and identifies the potential measures that may be introduced at the Site to promote alternative means of travel other than by private car such as walking, cycling and public transport. The Travel Plan is also intended to provide a mechanism to monitor the use of car parking spaces and car club spaces. This will enable an appropriate provision of car parking and car club spaces to be identified as the Development is implemented over time.
- 12.3 The Site has good levels of public transport accessibility. The Site achieves PTAL 4. This is a high level and demonstrates the Site's suitability for high density mixed use development.
- 12.4 The Transport Assessment and Travel Plan address the following fundamental issues:
- Access and circulation for pedestrians, cyclists and vehicular traffic as well as access to public transport facilities.
 - Parking provision for bicycles, motorcycles and cars.
 - Development and cumulative schemes (both committed and planned) generated trip forecasts and associated impact on the local pedestrian, public transport and highway networks.
 - The effect of servicing and the impact of construction traffic.
 - Travel Planning measures to promote the use of more sustainable transport modes and to reduce dependency on private car usage.

Pedestrian and Cycle Network

- 12.5 A key benefit of the Development is that it will significantly increase the pedestrian and cycling permeability around and through the Site. The use of the podium space will improve east-west connectivity.

Public Transport

- 12.6 The Development comprises a significant amount of new floorspace, as such the Transport Assessment has considered the impact of the Development on existing public transport capacity.
- 12.7 The Transport Assessment concludes that the Site, which is already served well by public transport in the form of buses, National Rail and London Underground, will help to shape the way in future spectators choose to travel. The improvements proposed to station facilities coupled with the completion of the Victoria Line upgrade will also support the increased numbers of spectators travelling to the Site. The management strategy proposed for major event days will ensure that spectators are dispersed more efficiently than that of the existing stadium which will allow for the High Road closure to be reduced. In addition to this, bus services are considered to meet the proposed demand for spectators travelling to and from Seven Sisters Station.
- 12.8 New stops, changes to bus stop locations, a new diversion route and junction improvements will all serve to additionally support the increased demand.
- 12.9 As such, it is considered that with the proposed mitigation measures and transport management plans in place, Haringey Council, Transport for London, and the Metropolitan and British Transport Police Services, there is sufficient capacity to safely and effectively transport the anticipated spectator demand to and from the 61,000 capacity stadium.

Car Parking

- 12.10 The Development comprises a maximum of 1,224 car parking spaces which will be located within the Stadium (accessed from Worcester Avenue), the hotel, the residential flats and houses and further parking located on Worcester Avenue.
- 12.11 For the residential parking and hotel parking, electric vehicle charging facilities will be available with 20% active and 20% passive. For the Stadium car parking, it is proposed that 20% of the spaces will have electric vehicle charging facilities.

- 12.12 A quantum of car parking spaces equivalent to 10% of the residential units will be designed to disabled standards.
- 12.13 The submitted Transport Assessment and Travel Plan demonstrate how any impact from the car parking spaces can be mitigated. The submitted Travel Plan provides a framework for delivering the vision for sustainable to and from the Development and identifies the potential measures that may be introduced at the Site to promote alternative means of travel other than by private car such as walking, cycling and public transport. The Travel Plan is also intended to provide a mechanism to monitor the use of car parking spaces and car club spaces. This will enable an appropriate provision of car parking and car club spaces to be identified as the Development is implemented over time.
- 12.14 Accordingly it is considered the Development accords with London Plan Policy 6.2 and 6.3, Local Plan Policy SP7 and the objectives set out in the draft Tottenham AAP.

Conclusion

- 12.15 The Development is considered to accord with planning policy. Specifically, the London Plan and Local Plan which requires proposals to assess the accessibility by a means of transport including walking, cycling, public transport and the car and the effect of the proposals on the local highway network.
- 12.16 The Development fully accords with London Plan Policy 6.3 which requires proposals to be fully assessed to ensure there is sufficient road network capacity and London Plan 6.2 which requires developments to provide adequate safeguarding for future transport schemes.
- 12.17 The Development fully accords with Local Plan Policy SP7 which requires applications to demonstrate that any impacts are minimised, seek to promote public transport including walking and cycling (and maximising cycle parking) and to ensure that a range of sustainable transport options are provided.

13 Environmental Considerations

- 13.1 The purpose of this Section is to review the main chapters of the Environmental Statement (ES) against planning policy. A full assessment of the impacts of the Development is included in the ES. The ES also recommends any mitigation measures that may be required as a result of the Development.

Noise and Vibration

- 13.2 The ES assesses the likely impacts arising from noise and vibration associated with the demolition and construction activities related to the Development. The ES also assesses the potential noise climate on and around the Site during and in the absence of a football match. The noise impact of the stadium has been assessed at the existing dwelling closest to the Site. The assessment considers noise levels generated during football matches, music concerts and NFL games.
- 13.3 The assessment of construction noise and vibration shows that certain works will generate a high noise and to a lesser extent, vibration levels. The ES has considered measures to reduce the level of noise during works taking place. The various mitigation measures proposed will also be included within a comprehensive Construction Environmental Management Plan (CEMP) which takes legislative safeguards into consideration. It is proposed that Best Practicable Means will also be adopted in order to mitigate this impact.
- 13.4 The ES analysis also identifies that there will be a slight increase in noise levels during football matches which will be mostly due to increased crowd numbers but that this would be insignificant at the existing dwellings near to the Site. Noise during NFL games and music concerts will be slightly higher. The ES notes that the noise levels during these events meet the appropriate criterion at the existing dwellings.
- 13.5 The ES states that the noise impact from external fixed plant noise will be a direct, permanent, negligible effect.
- 13.6 The Development fully accords with London Plan Policy 7.15 and saved UDP Policies ENV6.

Air Quality

- 13.7 The main impact on local air quality during demolition and construction relates to dust, which is most likely to be generated from demolition activities and earthworks. A range of measures to minimise or prevent dust will be implemented through a Dust Management Plan (DMP), which could form part of a wider Construction Environmental Management Plan (CEMP). With these measures, it is expected that any residual effects will be 'not significant'.
- 13.8 The impacts of local traffic and the boiler and generator plant on the air quality for residents living in the Development have been shown to be acceptable at the worst-case locations assessed, with concentrations being well below the air quality objectives.
- 13.9 In summary, the Development complies with the requirement that all new developments in London should be at least air quality neutral. The Development is better than air quality neutral and the Development therefore fully accords with London Plan Policy 7.14 and Local Plan Policy SP14.

Daylight, Sunlight and Overshadowing

- 13.10 The potential impacts of the demolition of the existing buildings and other structures on the site would lead to a temporary improvement in daylight, sunlight and overshadowing to nearby adjacent properties and amenity areas.
- 13.11 Construction of the Development will have a gradually increasing impact on the levels of sunlight and overshadowing as the massing of the Development steadily increases. This would occur on a phase by phase basis impacting on those properties situated closest to each phase of the Development.
- 13.12 The operation of the Development is judged to have result in some adverse impacts on a number of surrounding properties in terms of daylight and sunlight. With regard to daylight, the assessment identified two instances of minor to moderate adverse impacts on neighbouring properties, three instances of moderate adverse on neighbouring properties, two instances of moderate to major adverse on neighbouring properties and two instances of major adverse on neighbouring properties. This presents a worst case scenario given that it has not been possible to establish the use of each of the rooms impacted and therefore some of these rooms may be bedrooms which would reduce their sensitivity to the impact or they may be bathrooms, circulation space or ancillary rooms in which case the daylight impacts are not

considered relevant for assessment for daylight and sunlight as per the BRE guidelines. Furthermore, given the scale of the Development, this level of impact is deemed acceptable given the urban environment. Also, it is a relevant consideration that there were adverse impacts on daylight resulting from the consented 2011 scheme that was previously judged to be acceptable on balance.

- 13.13 With regard to sunlight, the assessment identified six instances of minor adverse impacts on neighbouring properties and some moderate adverse effects on properties on Worcester Avenue. As with daylight, the sunlight assessment concludes that overall these impacts are acceptable given the site's urban location and the context of the consented scheme also resulting in similar impacts.
- 13.14 The overshadowing impacts of the Development will meet the BRE guidelines for the Sun Hours assessment and the effects will be minor to moderate adverse in significance. As with daylight, some parts of the site are currently open (e.g. the carpark) whereby there is little massing on the site. Given the aspirations for the site and surrounding area, such levels of overshadowing are not unusual and could be considered commensurate with a dense urban environment.
- 13.15 Further detailed assessments of daylight, sunlight and overshadowing will be prepared alongside the reserved matters applications where further detailed design of the buildings, including building form, articulation, façade treatment and fenestration will allow the opportunity for improved results.
- 13.16 On balance, it is considered that the Development accords with London Plan Policy 7.6 and saved UDP Policy UD3.

Water Resources and Flood Risk

- 13.17 The ground conditions and hydrogeology assessment found that the Site has a long industrial history. A risk of ground contamination from arsenic, chromium, lead as well as petroleum products has been identified from past usage and results from the ground investigation. There could be a moderate adverse impact on groundwater and construction workers if these contaminants are encountered during construction and piling into groundwater if the proposed mitigation measures are not adopted. Through the CEMP, risk of contamination of the identified receptors will be minimised. The Development would not increase flood risk on the Site or elsewhere beyond the Site boundary, this accords with national, regional and local planning policy, specifically London Plan Policy 5.12 and Local Plan Policy SP6.

Ecology

- 13.18 The site is largely occupied by buildings, bare ground and hard standing with limited areas of amenity grassland and scattered semi-mature/mature trees. Buildings and trees typically provide shelter and breeding opportunities for bats and birds and therefore surveys for both species groups have been completed.
- 13.19 Previous bat transect surveys undertaken by CSA Environmental Planning in 2008 confirmed low levels of bat activity in association with the Site and found no evidence to suggest that bats roost at the Site. Update transect surveys undertaken in 2015 again confirmed low levels of activity in association with the site and found no evidence to suggest that bat roost are present on site.
- 13.20 A nesting bird survey undertaken in 2014 recorded kestrel and starling nests on the Site. Both species are well adapted to urban environment and therefore are not considered to be at risk of adverse effects resulting from the Project. Nesting birds are not considered to be a VER as part of the ecological assessment.
- 13.21 No mitigation measures are required in relation to any VER and no residual or cumulative effects are anticipated.
- 13.22 The ecological value of the Site will therefore be enhanced as a result of the Development due to the provision of a range of roosting/nesting features measures. These will benefit a range of locally important species including bats, kestrels, starlings, swifts and a range of other bird species commonly found in urban environments.
- 13.23 For the above reasons, the Development fully accords with planning policy, specifically, London Plan Policies 2.18, 7.19 and 7.21, Local Plan Policies SP11 and SP13 and saved UDP Policies UD3, ENV7 and OS17 .

Wind

- 13.24 An assessment of the likely wind conditions as a result of the Development and the suitability of these in terms of pedestrian comfort has been undertaken. The demolition and construction works would not be expected to have a significant impact on the wind conditions on, and immediately surrounding the Site.

- 13.25 London Plan Policy 7.7 states that tall buildings should not affect their surroundings in terms of wind turbulence. In general, the wind conditions likely to be experienced within and surrounding the Development are considered to be largely suitable for the intended uses. Further detailed design of the buildings for which outline planning permission is sought, will allow sufficient opportunity for mitigation measures to be incorporated into the design of the development. Such mitigation measures would be tested to ensure, validate and demonstrate that the expected wind conditions would be suitable.
- 13.26 It is therefore considered that this fully accords with planning policy and best practice.

14 CIL and Planning Obligations

Mayor's Community Infrastructure Levy

- 14.1 The Mayor of London's Community Infrastructure Levy ("CIL") is a tariff charged by the GLA on new development following 1st April 2012. The Mayoral CIL is charged in the Borough of Haringey at £35 per sqm (GIA).

Haringey CIL

- 14.2 Haringey CIL was adopted on 14th November 2014. The associated charge for residential floorspace is £15 per sqm (GIA). There is no charge associated for the other uses proposed as part of the Development.

Planning Obligations

- 14.3 The NPPF emphasises that local authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations (paragraph 203). In doing so, the NPPF (at paragraph 204) reiterates the statutory tests set out at Regulation 122(2) of the CIL Regulations 2010 (as amended) which mean that planning obligations can only be taken into account in determination of a planning application if they satisfy the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 14.4 The NPPF identifies that pursuing sustainable development requires careful attention to viability and costs in decision-taking.
- 14.5 The London Plan identifies planning obligations as a tool for mitigating a range of planning matters. Policy 8.2 notes that when considering applications of strategic importance the Mayor will take into account, among other issues including the economic viability of each development concerned, the existence and content of planning obligations. These should address strategic as well as local priorities.
- 14.6 Haringey Council has adopted its own Planning Obligations Supplementary Planning document (2014). This outlines those obligations that the Council will seek to secure from development, where necessary, that are not covered by the council CIL.
- 14.7 With regard to Section 106 obligations, these will be discussed and agreed with the Council during the application determination period. It is currently envisaged that, subject to the provision of Regulation 122(2) (as above) and paragraph 204 of the NPPF, obligations will cover the following matters:

(a) Stadium Development

Event Day Management

- Stadium Major and Minor Event Travel Plans
- Local Area Management Plan
- Modal Split Targets
- Event Day Monitoring Programme and Review Mechanisms
- Controlled Parking Zone Extension
- Stage 1 and Stage 2 Shuttle Bus
- Home Supporter Travel Initiative
- Retention of Visitors Measures

Podium and Public Access Space

- Public Access requirements
- Management and Maintenance requirements
- Cultural /Community Events

Business and Skills

- Employment and Skills
- Business Support

Community Health Centre

- Community Health Centre travel plan

Heritage

- Heritage Management Plan
- Warmington House / Tottenham Experience
- Retention/Reuse Of Features From 746, 748 And 750
- Works to and use of 796 High Road
- Works to and use of 810 High Road
- Works to other THFC owned heritage buildings

Highways

- Stadium Highways Works
- Event Day CPZ

Energy

- Energy Strategy
- Connection to District Energy Network
- Carbon reductions / BREEAM "Very Good"

Miscellaneous

- Television Reception Mitigation
- Season Tickets For Local People
- Educational Visits
- Electric Car Parking Spaces
- Considerate Constructors Scheme
- Public Art/Public Art Strategy

(b) Hotel Development

- Hotel Travel Plan
- Business and Skills
- Energy/Sustainability – Connection to DEN and Carbon reductions
- Electric Car Parking Spaces
- Hotel Phase Highways Works

(c) Residential Development [Residential, Community/Commercial, Extreme Sports Centre]

Travel Plans

- Residential Travel Plan
- Community/Commercial space Travel Plan
- Extreme Sports Travel Plan

Energy/Sustainability

- Connection to DEN
- Carbon reductions
- Equivalent to Code for Sustainable Homes Level 4

Highways

- Car club
- Electric Car Parking Spaces

Miscellaneous

- Business And Skills
- Television Reception Mitigation
- Public Art/Public Art Strategy

- 14.8 As explained at paragraph 9.32 above the Applicant is assessing the viability of the proposed development for the purpose of considering the amount of affordable housing that can be delivered as part of the development.
- 14.9 The Council has appointed independent consultants to advise on matters of viability and to undertake an independent review of the Applicant's viability analysis.
- 14.10 Discussions will continue between the Applicant and the Council regarding affordable housing which will inform the Section 106 Agreement

15 Conclusions

- 15.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the Development Plan unless other material considerations indicate otherwise. This Statement assesses the Development against the Development Plan and other relevant national, regional and local planning policy and guidance.
- 15.2 The proposed Development provides an opportunity to deliver much needed regeneration in this part of Tottenham. The importance of the Football Club to this part of Tottenham was recognised in the 2011 Panel Report following the Tottenham riots, with the Club's commitment to redevelop its existing site identified as carrying significant regeneration potential and providing a catalyst for wider regenerative change the area. The strong support for the redevelopment of the NDP for a mixed-use scheme is understandable given the substantial public benefits that the Development will deliver, as outlined earlier in this statement, including:
- Securing the long term future of the grade II listed Warmington House by providing the heritage asset with an optimum viable as part of the Club's visitor experience offer.
 - Enhancing the character and setting of the NTCA, with the Development strengthening the historic High Road frontage, with new and retained buildings reflecting the historic street pattern in the area.
 - The delivery of a new museum for Tottenham that provides the opportunity to showcase the area's historic and cultural heritage. The museum will be a resource for the archiving and deposit for both the Club's history and the history of Tottenham the place.
 - Significant enhancements to public safety on event days, with the long-standing safety issues associated with the 1.9m pinch point at the front of No. 750 being addressed.
 - The delivery of a new community health centre will provide much needed health services and facilities for the residents of Tottenham, helping to address the existing chronic health inequalities suffered in this part of the Borough.
 - The new sports and recreation facilities provided through the delivery of the Extreme Sports building, the multi-use activity areas within the podium public space and the use of the stadium for community sports events will provide increased access to sports facilities and programmes that will help to tackle Tottenham's long-standing health issues, particularly child and adult obesity.
 - The delivery of 585 new, high quality, homes will broaden the quality and attraction of housing within Tottenham. The need to greatly improve and rebalance the housing stock was recognised as one of the key challenges to the securing the regeneration of Tottenham identified in the Panel Report to the 2011 Riots.
 - The Development would significantly enhance the economic prospects of this part of Tottenham, helping to address the economic inequalities of this deprived area. The Development as a whole, will generate:
 - Up to an additional 700 full-time equivalent (FTE) jobs on-site, which is a very significant increase from the previously consented scheme which would 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;
 - The residential element itself will generate £7.9m of household spending, much of which will be focussed on the local area;
 - The use of the stadium for at least two NFL American football matches per year has 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 8 per year, has the potential to generate up to £12m of additional spend in the area;
 - The hotel and serviced apartments has the potential to generate up to £560,000 of additional spend in the area; and
 - The Extreme sports Centre has the potential to generate between £200,000 to £2.4m of additional spend in the area.
- 15.3 It is clear therefore that the scheme will deliver many substantial public benefits that should weigh in its favour.
- 15.4 Overall, the Development is considered to accord with adopted and emerging planning policy. The likely impacts of the Development have been fully assessed by the Environmental Statement and other application documents. The Development is considered to be entirely appropriate for its location.

- 15.5 The development proposals are considered to accord with the up to date development plan and therefore benefit from the presumption in s38(6) of the 1990 Act. Furthermore, it accords with the policies of the NPPF as a whole, and is deemed to be 'sustainable development' in terms of Paragraph 14, which benefits from the presumption in favour. The Development therefore should be granted planning permission.

Appendix 1 – Relevant Planning History for the Application Site

Application Number	Description of Development
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.
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.
HGY/2010/1002	Listed Building Consent for internal and external alterations of Warmington House and part demolition to remove later additions.
HGY/2010/1003	Listed Building Consent for demolition of Fletcher House 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.
HGY/2011/2200	Application for a non-material amendment following a grant of planning permission HGY/2010/1000 for insertion of a new condition to list the approved plans.
HGY/2012/0096	Non- material amendment following a grant of planning permission HGY/2010/1000.
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.

HGY/2012/0983	Non-material amendment following a grant of planning permissions HGY/2011/2350 for minor changes to the substation in north west corner of the site to include minor alterations to the siting and size of the proposed substation.
HGY/2012/1210	Non - material amendments following a grant of planning permission HGY/2011/2350 to Green Wall (small section) adjacent to sub-station reduced in height by 1750mm to accommodate store signage, Green Wall (main section) moved in an eastern direction by 500mm to provide building tolerance, 27 Sheffield bike stands added against west facing elevation, Intermediate landing on Fire Stair D added and stair position amended, Additional Fire Exit door added to north elevation superstore cafe, Sheffield bike stands added outside cafe area for store usage, Elevational Position and treatment to travelator area amended and closed off, Roller shutters added to car park entrance, Taxi office removed and replaced by car pick-up point, Store sub-station relocated from car park into service yard (double doors removed from east elevation) and 3 additional parking bays added, Service yard entrance gates amended and access gate added, Service yard plant equipment and sub-station relocated, Total number of parking bays amended, Roller shutters added to the North and West facing car park entrances for security purposes, Height Restriction Bar added to the North and West facing car park entrances for security purposes. Fire Exit doors from SW corner adjacent to stair D adjusted, Revelatory position adjusted, Glazed Bay windows along north face elevation adjusted to avoid column clashes and reflect original 2010 application rhythm, Service yard plant equipment adjusted.
HGY/2012/1682	Non - material amendment following a grant of planning permission HGY/2011/2350 for the introduction of a modest atrium space, remove windows to the south facade at podium, minor adjustment to the line of the building at upper level.
HGY/2011/2351	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.
HGY/2015/0797	Approval of reserved matters relating to scale in respect of outline consent 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; and altered footways, roads and vehicular accesses.
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

Appendix 2 –Outline Planning Application Detail

(i) Proposed Application Detail for Southern Residential

Reserved Matter	DMPO 2015 Reserved Matter Requirement	Permission sought	Submission Detail	Controlling Mechanism
Access	"The accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network"	Detailed Approval Sought	Plans for approval showing: - Layout plans will show fixed vehicular, pedestrian and cycle access in to and out of the site; - Access routes through the site and how they integrate with the local area will be confirmed, with the layout of the development blocks submitted for approval	Implementation in accordance with approved plans
Appearance	"The aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture"	Reserved for subsequent approval	Residential Design Code covering the following matters: - Internal layout - Appearance	(1) Condition ensuring any subsequent reserved matters application for 'appearance' is submitted with : <i>A Design Code Compliance Statement to demonstrate that the design of the elevations and the selection of materials accords with the mandatory "Appearance Design Codes"</i> (2) Approval of Reserved Matters application for 'appearance'. (3) Legal obligation in the s106 to ensure high quality architectural practice is retained for the reserved matters stage
Landscape	"The treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes:	Reserved for subsequent approval.	Indicative landscape plan submitted	Approval of Reserved Matters application for 'landscape'.

	- screening by fences, walls or other means; - the planting of trees, hedges, shrubs or grass; - the formation of banks, terraces or other earthworks; - the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and - the provision of other amenity features."			
Layout	"The way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development"	Detailed Approval Sought	Plans for approval showing: The layout of development blocks showing how the blocks relate spatially relate to each other and to the spaces around them	Implementation in accordance with approved plans
Scale	"The height, width and length of each building proposed within the development in relation to its surroundings"	Detailed Approval Sought	Plans for approval showing: The height, width and length of each building	Implementation in accordance with approved plans

(ii) Proposed Application Detail for Extreme Sports Centre

Reserved Matter	DMPO 2015 Reserved Matter Requirement	Permission sought	Submission Detail	Controlling Mechanism
Access	"The accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network"	Detailed Approval Sought	Plans for approval showing: - Layout plans will show fixed vehicular, pedestrian and cycle access to the block; - Access routes through the site and how they integrate with the local area will be confirmed	Implementation in accordance with approved plans

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Appearance	“The aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture”	Reserved for subsequent approval	The Design and Access Statement will set out design principles to guide any subsequent reserved matters application for appearance	Approval of Reserved Matters application for ‘appearance’.
Landscape	“The treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: • screening by fences, walls or other means; • the planting of trees, hedges, shrubs or grass; • the formation of banks, terraces or other earthworks; • the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and • the provision of other amenity features.”	Detailed approval sought	Plans for approval showing landscape treatment surrounding the building	Implementation in accordance with approved plans.
Layout	“The way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development”	Detailed Approval Sought	Plans for approval showing: • The layout of the building. The layout is defined by the layout of the hotel and the ‘pitch pocket’ which are submitted for full approval.	Implementation in accordance with approved plans
Scale	“The height, width and length of each building proposed within the development in relation to its surroundings”	Reserved for subsequent approval	Plans for approval showing: • The maximum parameters for the height, width and length of the building.	Approval of Reserved Matters application for ‘scale’ in accordance with approved parameters.

(iii) Proposed Application Detail for Community Health Building

Reserved Matter	DMPO 2015 Reserved Matter Requirement	Permission sought	Submission Detail	Controlling Mechanism
Access	"The accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network"	Detailed Approval Sought	Plans for approval showing: - Layout plans will show fixed vehicular, pedestrian and cycle access in to and out of the block; - Access routes through the site and how they integrate with the local area will be confirmed	Implementation in accordance with approved plans
Appearance	"The aspects of a building or place within the development which determine the visual impression the building or place makes, including the external built form of the development, its architecture, materials, decoration, lighting, colour and texture"	Reserved for subsequent approval	The Design and Access Statement will set out design principles to guide any subsequent reserved matters application for appearance	Approval of Reserved Matters application for 'appearance'.
Landscape	"The treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated and includes: - screening by fences, walls or other means; - the planting of trees, hedges, shrubs or grass; - the formation of banks, terraces or other earthworks; - the laying out or provision of gardens, courts, squares, water features, sculpture or public art; and - the provision of other amenity features."	Detailed Approval Sought	The outline application line will be drawn around the development block so the landscaping will fall within the full application for the stadium.	Implementation in accordance with approved plans
Layout	"The way in which buildings, routes and open spaces within the development are	Detailed Approval Sought	Plans for approval showing:	Implementation in accordance with approved plans

PLANNING STATEMENT

	provided, situated and orientated in relation to each other and to buildings and spaces outside the development”		The layout of the building. The layout is defined by the layout of the stadium and the podium which are submitted for full approval.	
Scale	“The height, width and length of each building proposed within the development in relation to its surroundings”	Detailed Approval Sought	Plans for approval showing: The height, width and length of each building	Implementation in accordance with approved plans

Appendix 3 – Crowd Safety Options Appraisal

Crowd Safety Options Appraisal

Tottenham Hotspur Athletic Football Club Limited

September 2015

Jointly produced by:

Movement Strategies

Populous

Tim Spencer & Co.

Executive Summary

This report has been produced to consider crowd safety issues, and the feasibility and implications of retaining the following three locally listed buildings on High Road:

- No. 746 High Road (known as the Edmonton Dispensary)
- No. 748 High Road (known as the Redhouse Coffee Palace)
- No. 750 High Road (formerly Valentino's Nightclub)

All three of these buildings were retained in the previously approved scheme (HGY/2010/1000) ("the Consented Scheme"). However, as detailed in the Planning Statement prepared by DP9, circumstances have changed since the previous proposals were approved in 2011.

Movement Strategies (MS) on behalf of THFC has undertaken a detailed assessment of current conditions at the existing stadium. This assessment has identified large numbers of spectators walking in the High Road before a match as a consequence of the 'pinch point' created by the narrow footpath in front of nos. 746/748 and 750 High Road.

The Consented Scheme provides a "canyon" behind the three buildings, which was designed to divert spectators away from this recognised pinch point. MS has concluded that the canyon would not be effective in diverting spectators from the natural route along the High Road.

As such, the retention of the four buildings in the Consented Scheme will deliver a clear risk to pedestrian safety.

Having identified this risk, THFC and its design team are committed to securing a design to reduce the degree of risk to spectators and the general public to as low as reasonably practicable ("ALARP"), which presumes that change is made in favour of safety unless the cost is grossly disproportionate to the benefit.

MS has undertaken a detailed assessment to determine acceptable levels of service in this situation, as a basis for evaluating a series of alternative options to seek to reduce the risk to ALARP.

The proposed new scheme designed by Populous, which involves the removal of the three locally listed building, has been tested using the same methodology.

This option has been found to be acceptable in crowd safety and highways and transport terms. This option reduces the risk to spectators and the public to ALARP.

A number of options have been considered, ranging from the introduction of intensive stewarding and barriers, to the temporary and permanent closure of the bus lane and both south bound lanes, to more radical options including moving the High Road, providing a flyover or tunnel, or constructing an elevated walkway in front of the NDHA. MS conclude that the retention of the three buildings, delivery of the 'canyon' and the provision of intensive stewarding and barriers on the Eastern and Western sides of the High Road would not provide a satisfactory solution to the identified safety concerns.

The MS analysis excludes the additional impacts arising from reoccupation of the buildings by food and beverage ("F&B") operators, which are the only viable source of commercial occupier demand for the three buildings. However this demand is conditional on the provision of external space for smoking/drinking on match days. This external space would need to be limited and contained spatially, and access and queuing managed to minimise congestion in the canyon.

Based on the views of Davis Coffey Lyons, it is uncertain whether the imposition of such management restrictions would be compatible with operators' requirements for these units. In these circumstances the viability of these units for F&B uses is uncertain given the constraints imposed by safety considerations.

The series of options involving the temporary/permanent closure of the southbound bus lane, or the closure of both southbound lanes all cause significant highways and transport issues, including congestion, unacceptable route diversions, and loss of public transport accessibility, which are inconsistent with the transport strategy and wider accessibility objectives. In any event, none provides a satisfactory, permanent solution to the identified safety concerns.

The more radical options have been discounted on the basis that they are not deliverable, (without fundamentally undermining the viability of the project and/imposing unacceptable delays to delivery), and that any possible benefits in terms of the retention of the three buildings would be outweighed by very significant highways, traffic and heritage impacts elsewhere. These options would be likely to lead to significantly more harm to heritage assets than the proposed scheme.

In these circumstances, the revised proposals, involving the removal of the three buildings (but the retention of the statutorily listed Warmington House), provide the only deliverable solution which is acceptable in highways and transport terms and reduces the identified risk to spectators and the public ALARP. This is a very important material consideration, which must be weighed in the overall planning and heritage balance, which is set out in the Planning Statement.

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1.0 Introduction

- 1.1 This report has been produced to consider crowd safety issues, and the feasibility and implications of retaining the following three locally listed buildings on High Road:
- No. 746 High Road (known as the Edmonton Dispensary)
 - No. 748 High Road (known as the Redhouse Coffee Palace)
 - No. 750 High Road (formerly Valentino's Nightclub)
- 1.2 All three of these buildings were retained in the previously approved scheme (HGY/2010/1000) ("the Consented Scheme"). However, as detailed in the Planning Statement prepared by DP9, circumstances have changed since the previous proposals were approved in 2011.
- 1.3 As part of a detailed review of the Consented Scheme THFC commissioned Movement Strategies ("MS") to undertake a review of the crowd safety matters.
- 1.4 Although Nos. 744 - 750 High Road have traditionally been treated as group for the purposes of preparing and evaluating previous planning applications for the replacement stadium scheme, there are important distinguishing characteristics that separate No. 744 High Road from Nos. 746 - 750 High Road.
- 1.5 No. 744 High Road is set back from the back of pavement by 14.5m, providing an effective footpath width of 10.2m¹ for crowd flow.
- 1.6 In contrast No. 746 is set back by 4.2m; No. 748 by 2.2m; and No. 750 High Road by 2.6m.

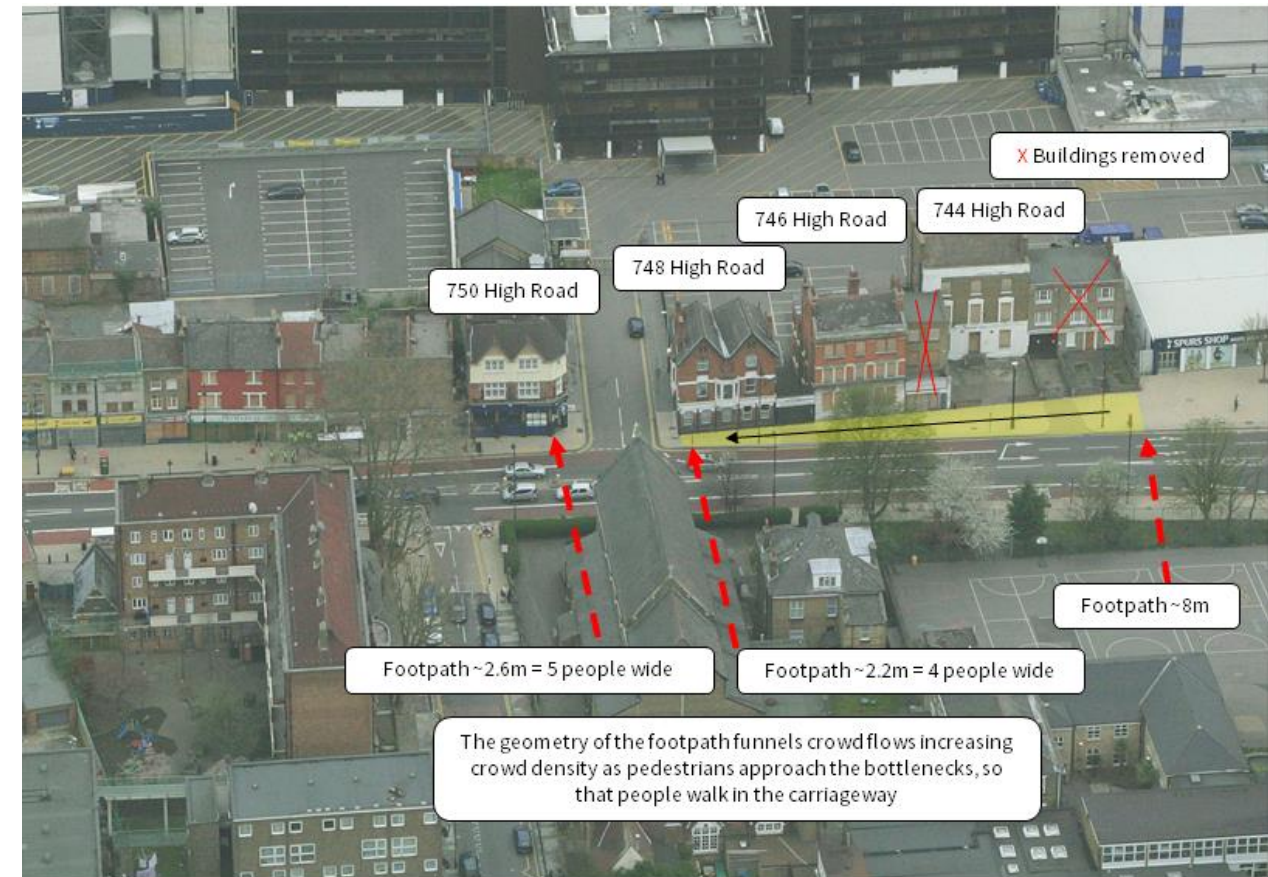


Figure 1 Aerial view of 744 – 750 High Road

- 1.7 Whereas the footpath width formed by No. 744 High Road is sufficient to allow safe crowd movement, the narrow and narrowing pavement width caused (Fig. 1) by the much smaller set-backs in front of Nos. 746 - 750 High Road causes significant numbers of pedestrians to walk in the road before a match. Evidence for this is shown from the numerous crowd flow surveys undertaken during the 2014/15 season.
- 1.8 The significant numbers of pedestrians in the road presents risks to pedestrian and driver safety.
- 1.9 The A1010 High Road is a Strategic Road within the TfL road hierarchy – only one level below the Priority (Red) Routes such as the A10 south of Bruce Grove. The Northumberland Development Project is unusual in that it proposes a large stadium immediately adjacent to such a major road.
- 1.10 LB Haringey is the highway authority but TfL have an effective control over any works and traffic management within the public highway. Both authorities have a responsibility to safely manage the adopted highways. There are significant additional safety considerations associated with the operation of a stadium, and the licensing regime, which also have to be taken into consideration. Crowd safety is a key issue.
- 1.11 The relationship between the stadium and the use of the High Road gives rise to a number of important crowd safety and transport issues. Figure 2 shows stills from video surveys during the 2014/5 season, which illustrate the typical pre match situation at the pinch point. The pedestrian and vehicular conflicts, and resultant safety issues are self evident.

¹ Width reductions applied for the proposed new bus stop (2m) accepting that the bus stop furniture could be less obtrusive with appropriate design but would still attract waiting passengers, the stairs for Warmington House (1.9m), and a 0.2m edge effect on the bus stop and building edge in line with TfL Pedestrian Comfort Guidance.



Figure 2 Stills from video surveys during the 2014/15 season

1.12 This report:

- Explains why crowd safety issues arise;
- Sets out an analysis of current crowd flows;
- Explains the approach taken to minimise crowd safety risks;
- Identifies suggested targets to minimise risks to acceptable levels;
- Sets out predicted crowd flows for the new stadium;
- Analyses the relationship between crowd flow issues and the future use of the three locally listed buildings; and
- Explains the relationship between crowd flow issues and the wider transport strategy for the new stadium.

1.13 Against the background of this information the report analyses a number of design and management options retaining the three buildings and evaluates those options in terms of:

- Whether they will adequately resolve the crowd safety issues;
- Their implications for the local and strategic transport network;
- Their impact on the viability of the ongoing use of the three buildings; and
- Their deliverability.

1.14 This report has been jointly produced by Movement Strategies (crowd movement consultants); Populous (joint architects for the proposed stadium and Tottenham Experience); and Tim Spencer & Co. (transport consultants). The report should be read in conjunction with the Heritage Impact Assessment chapter of the Environmental Statement (and the separate Heritage Statement), which have been prepared by Donald Insall Associates, and the report by Davis Coffey Lyons which considers occupier demand for these units and potential occupiers operational requirements.

1.15 The Planning Statement (prepared by DP9) draws together all the relevant considerations, including safety, deliverability, transport and highway issues, heritage, and the wider heritage, regeneration and other substantial public benefits which the scheme delivers, to assess the justification for the removal of the three buildings in the context of the relevant legal and planning tests.

2.0 Analysis of Crowd flow survey data

2.1 Count locations and time

2.1.1 Counts of people walking on the road and walkway were undertaken from video footage of ingress to a number of matches in the 2014/15 season. The results from the match vs. Hull City on 16th May 2015, 15:00 are described below. This match represents a typical Saturday afternoon fixture.

2.1.2 Each minute from 13:35 to 15:05 was counted separately. Three locations were counted on the eastern footpath of the High Road:

- Outside 748 High Road where the total width is 2.2m, and effective width 1.8m
- Outside 750 High Road where the total width is 2.6m, and effective width 2.2m
- Just north of Paxton Rd where the total width is 4.5m and effective width 4.1m

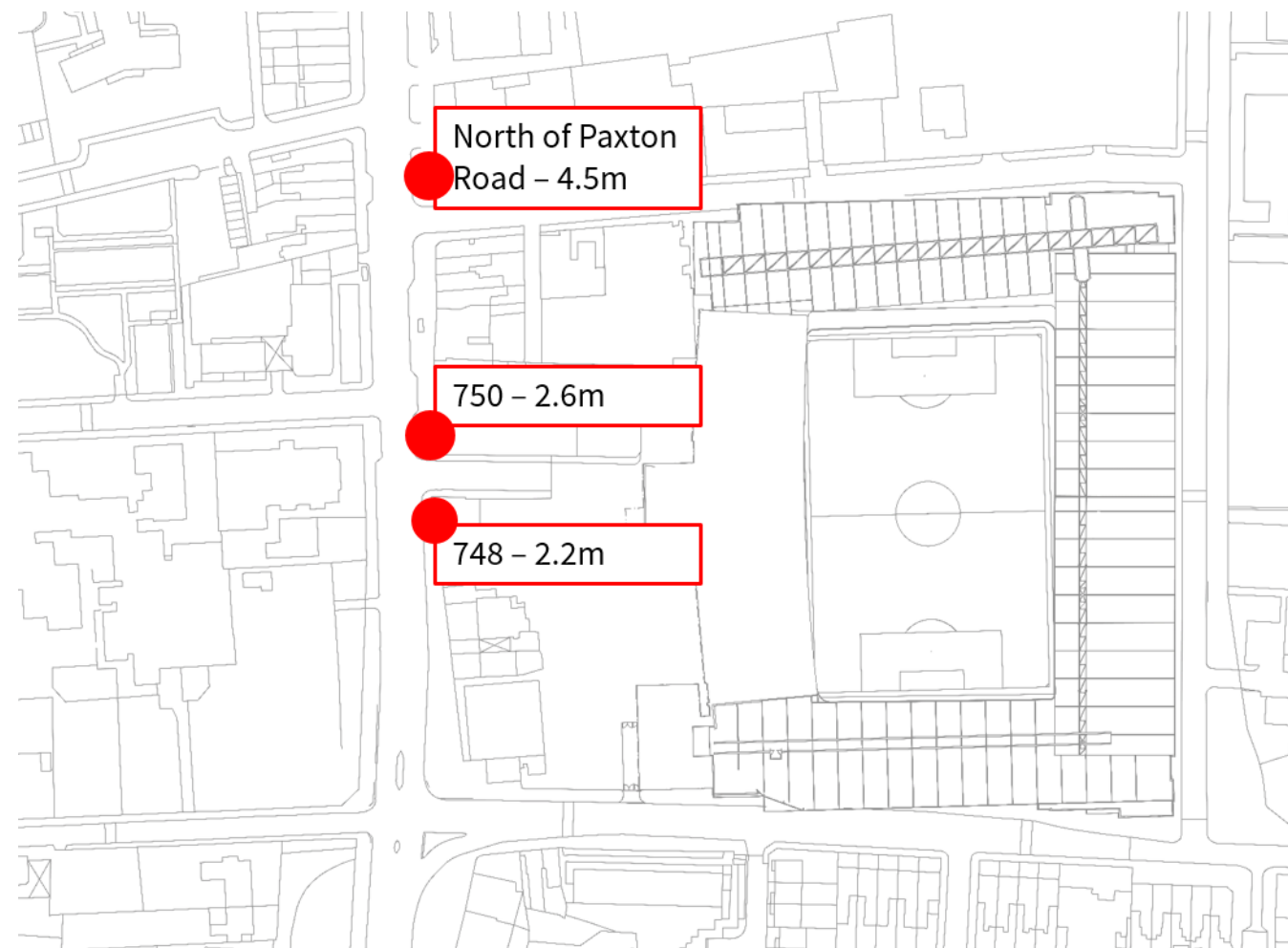


Figure 3 Locations where video surveys have been analysed and widths of walkways at these locations

2.2 Results

2.2.1 The number of people in the road is significant throughout the assessment period.

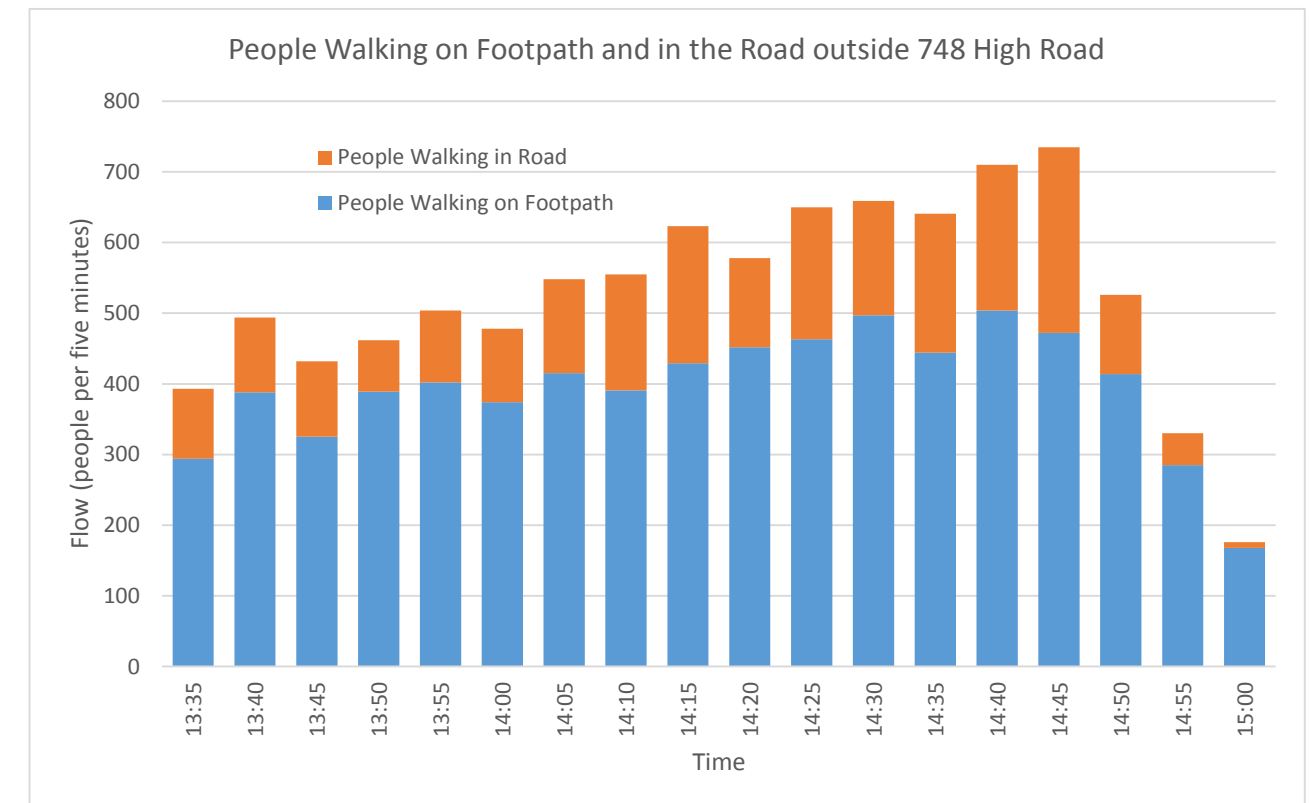


Figure 4 Flows each 5 minutes past 748 High Road during the match vs. Hull City 16th May 2015 15:00 kick-off

2.2.2 Throughout the assessment period, 2,388 (25% of) people walked in the road outside 748 High Road.

2.2.3 During the hour before the match this percentage was higher (27%), and higher again in the peak fifteen minute period (30 minutes to 15 minutes before kick-off) (32%) and peak five minutes (15 minutes before kick-off) (36%).

2.2.4 Survey data from other matches produced similar results. For example, in the hour before the West Ham match on 22 February 2015, 12:00pm kick off, 2,436 people walked in the road. That was 33% over the hour, and up to 40% during the peak periods.

2.3 Contraflow

2.3.1 Outside 748 and 750 High Road the flow was two-directional, with at most 61% observed in one direction during any five minute period. The direction which had the majority of flow was sometimes northbound and sometimes southbound. On average the flow in each direction was almost equal with 53% at 748 High Road and 56% at 750 High Road going northbound.

2.3.2 In contrast, north of Paxton Rd and thus north of the whole stadium, during the hour before kick-off, the flow was predominantly one directional southbound towards the stadium. There was only 3.5% contraflow over the hour and 1.5% during the peak fifteen minutes. Prior to that hour there was an average of 19% contraflow.

2.4 Analysis of Proportion in the road vs. flow rate

2.4.1 The total number of people in both on the walkway and on the road (people per minute) has been divided by the walkway width (metres) to produce a flow rate (people per metre per minute) for the three locations.

2.4.2 Outside 748 High Road

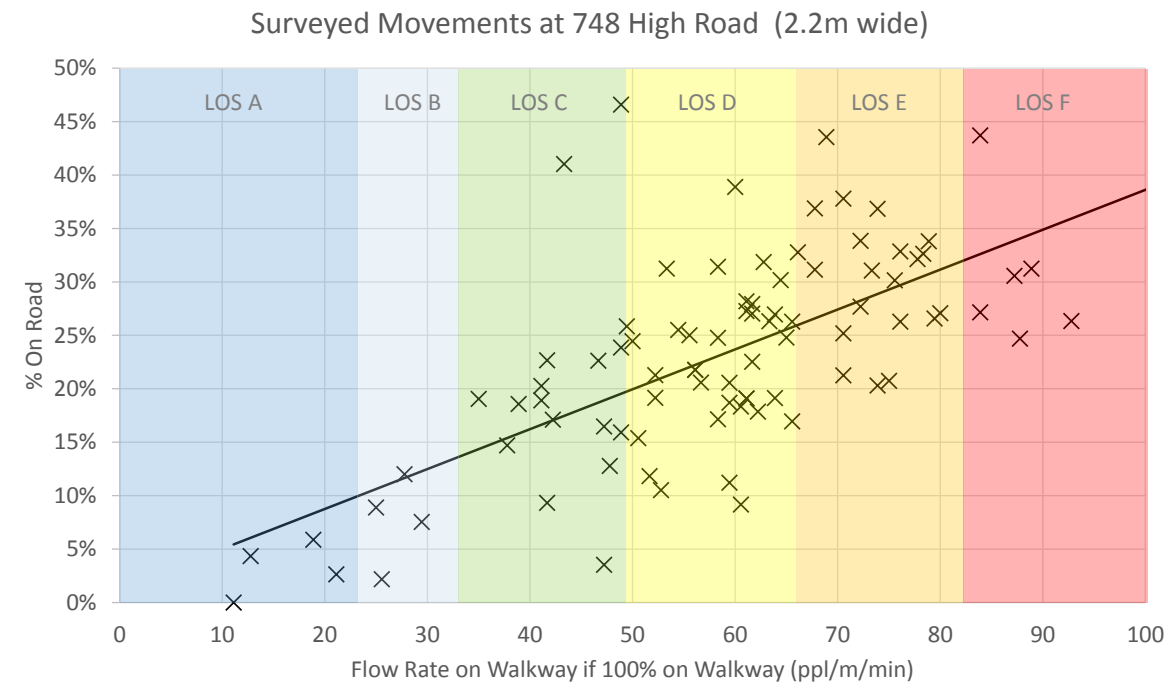


Figure 5 Percentage of pedestrians in road vs implied flow rate if all people on the footpath, outside 748 High Road

- 2.4.3 There was only one minute at the end of the survey period (shortly after the match had kicked-off) during which no people were observed in the road. The survey identified that people walked in the road at low flow rates.
- 2.4.4 The graph demonstrates a positive relationship between the flow rate on the footpath and the number of people who will walk in the road. However, from the information collected, it is impossible to establish a flow rate below which no people will walk in the road.

2.4.5 Outside 750 High Road

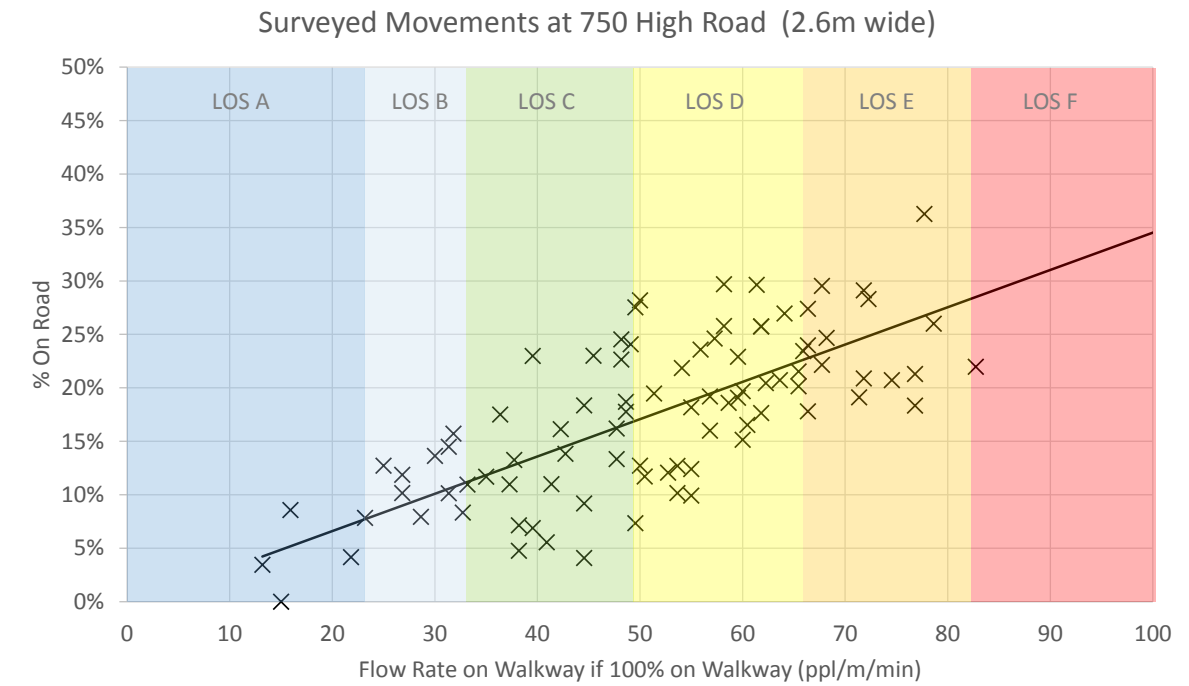


Figure 6 Percentage of pedestrians in road vs implied flow rate if all people on the footpath, outside 750 High Road

- 2.4.6 There was only one minute, two minutes after kick off, during which no people were observed in the road.
- 2.4.7 Again the graph demonstrates a positive relationship between the flow rate on the footpath and the number of people who will walk in the road.
- 2.4.8 The percentage of people in the footpath (width 2.6m) is higher than outside 748 (width 2.2m) at the same flow rates.

2.4.9 North of Paxton Road

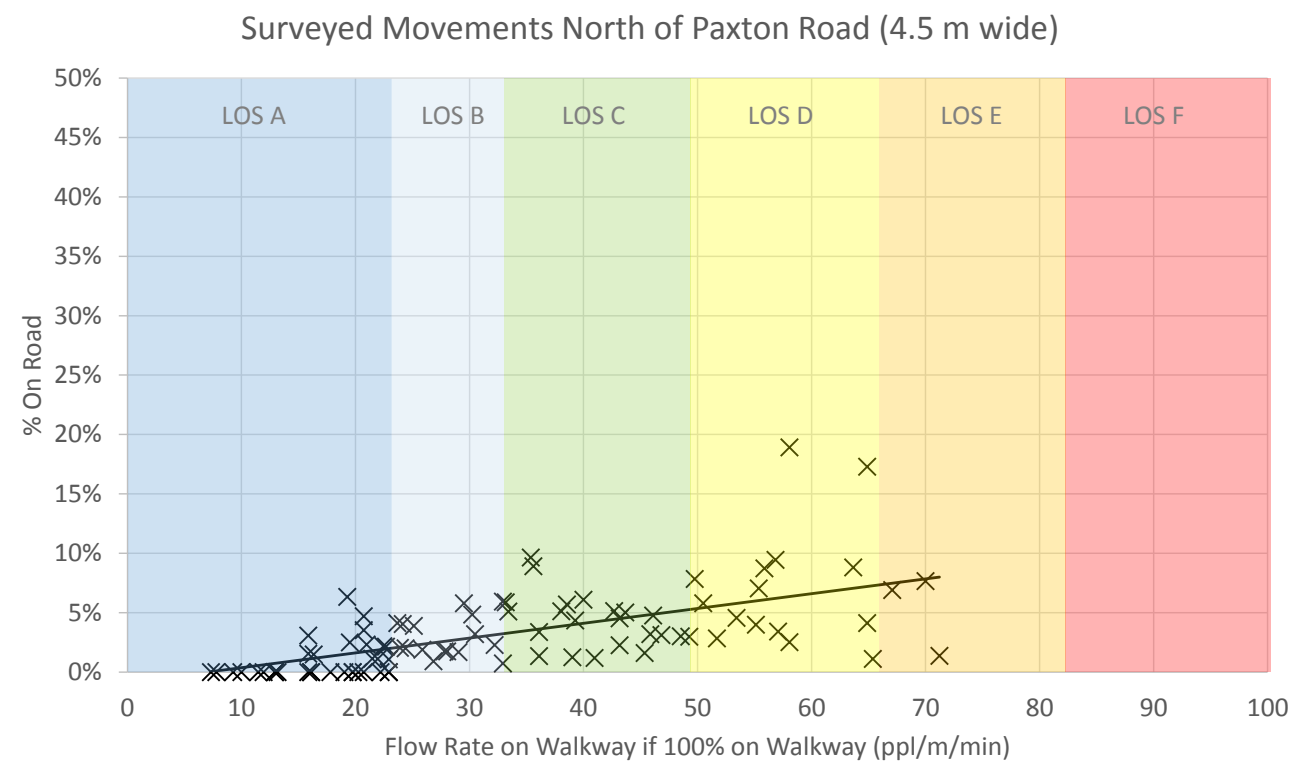


Figure 7 Percentage of pedestrians in road vs implied flow rate if all people on the footpath, north of Paxton Road

- 2.4.10 Across the 90 minutes surveyed there were 23 minutes during which no people were observed walking in the road. Almost all of these observations were outside the peak hour before kick-off. During the period 14:00-14:57 there was only one minute (at 14:22) during which no people were observed walking in the road.
- 2.4.11 There is a positive relationship between the flow rate and the number of people walking on the road.
- 2.4.12 The percentage of people in the road was lower than at 748 and 750 at the same flow rates.

2.5 Comparison of all three locations

- 2.5.1 Results from the three sites have been plotted on the same chart, with linear trend lines fitted to each to aid in comparison.

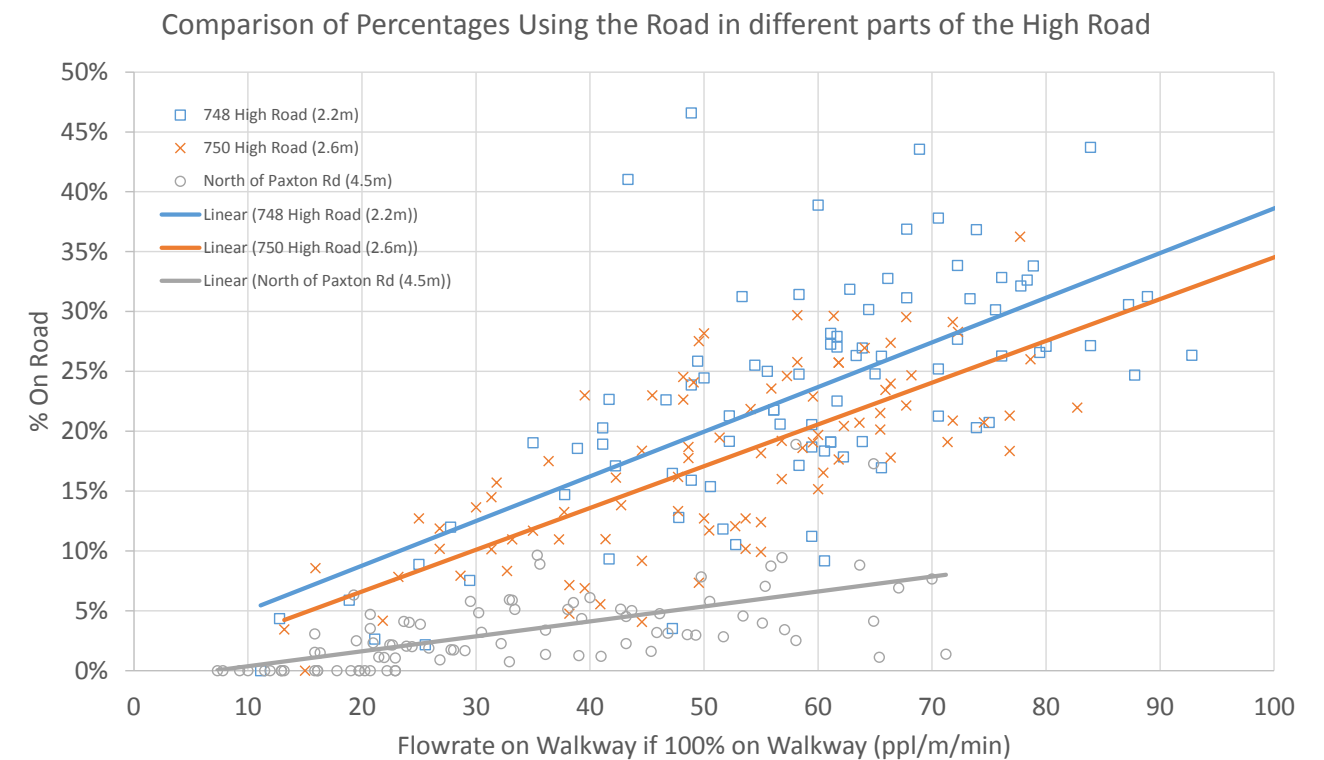


Figure 8 Comparison of flow rate on road and percentage in the road at the three locations.

- 2.5.2 As the width of the footpath increases, the percentage of people walking in the road decreases.

- 2.5.3 As the flow rate increases, the percentage of the people in the road increases.

2.6 Conclusions from the survey data

- 2.6.1 On the High Road approaching the stadium fans walked in the road even at low flow rates at all three sites.
- 2.6.2 The width of 4.5m north of Paxton Rd was not sufficient to encourage all of the fans to remain on the footpath.
- 2.6.3 Results from video surveys along the High Road demonstrate that:
- the proportion of people walking in the road increases as the flow rate increases;
 - the narrower the pavement width the higher proportion of pedestrians who will walk in the road; and
 - At narrow footpath widths pedestrians walk in the road even at low flow rates as there is little opportunity for them to manoeuvre past other pedestrians and remain on the walkway. This problem is exacerbated due to the number of spectators who arrive at the stadium in groups.

3.0 Crowd Flows

3.1 Safety Defining Appropriate Standards

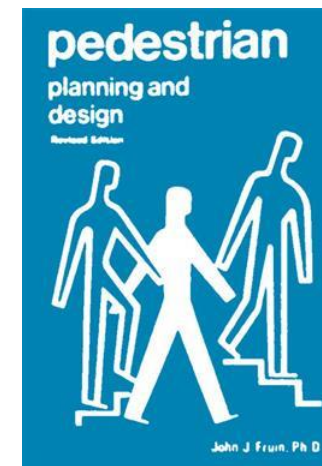
- 3.1.1 The analysis of the current conditions experienced by spectators at the existing stadium identifies a significant risk to safety as a consequence of the number of spectators walking in the road in the period before matches.
- 3.1.2 The risk arises from the narrow, and narrowing, footpath along the High Road outside the buildings. There is insufficient space so that the pedestrians bypass slower moving pedestrians or avoid conflict - or anticipated conflict - with counter flows by stepping into the available space in the bus lane. The frequency of conflicts is increased in this situation by the presence of a high proportion of groups visiting the stadium, and the narrowing footpath that creates higher crowd densities.
- 3.1.3 Against this background THFC and its design team have sought to design the new stadium and its environs to reduce risks to spectators to be As Low as Reasonably Practicable ("ALARP").
- 3.1.4 *"Making sure a risk has been reduced ALARP is about weighing the risk against the sacrifice needed to further reduce it. The decision is weighted in favour of health and safety because the presumption is that the duty-holder should implement the risk reduction measure."*
- 3.1.5 *To avoid having to make this sacrifice, the duty-holder must be able to show that it would be grossly disproportionate to the benefits of risk reduction that would be achieved. Thus, the process is not one of balancing the costs and benefits of measures but, rather, of adopting measures except where they are ruled out because they involve grossly disproportionate sacrifices."*²
- 3.1.6 This report assesses the proposed scheme against this objective, and considers whether it is feasible to reduce risks to ALARP while retaining the three locally listed buildings.
- 3.1.7 The starting point of the analysis is to consider appropriate flow rates at which the risk is reduced to ALARP.
- 3.1.8 This requires consideration of the concept of the Level of Service that pedestrian visitors to the stadium will enjoy. Level of Service relates the circumstances and conditions experienced by pedestrians (including whether they are likely to experience conflict) to flow rates and crowd densities.
- 3.1.9 It is necessary to consider both the flow rates at which there are few pedestrian conflicts and also whether the width of footway is sufficient to avoid conflicts even at low flow rates.
- 3.1.10 Our methodology for evaluation of the flow rates, Level of service, and whether there is sufficient clear width for flow in the various options has been to:
- Determine forecast for crowd flows (people/minute) during the peak 15 minutes in the vicinity of the stadium for the options being considered. The forecast is based on the Transport Assessment (which describes when and where people arrive into the area, what local facilities they use in the local area and the time profile over which they arrive in the immediate vicinity of the stadium); their ultimate destination in the stadium, and the use of the Club shop;

- Determine the effective widths of the walkways for the walkway under consideration by reducing the width to take account of obstructions in the walkways and edge effects;
- Determine flow rates (people/metre/minute) by dividing flows by the effective widths of the walkway;
- Relate flow rates to the conditions experienced by pedestrians (e.g., whether there are likely to experience conflict) using the concept of Level of Service; and.
- Determine whether this Level of Service is acceptable for the option under consideration.

3.1.11 We have then considered whether the options presented create other crowd safety risks arising from mitigation measures.

3.1.12 Two sets of guidance were considered in our crowd flow and safety evaluation.

3.2 Fruin Levels of Service



3.2.1 The Level of Service concept for pedestrian flow was developed by Professor Fruin, (described in Pedestrian Planning and Design, Fruin, 1971) and is the most widely applied basis of quantitative assessments of crowded places. The concept relates crowd density, flow rates and pedestrian experience. It forms the basis of standards applied in different types of buildings and places, particularly those applying to high crowd flow environments, for example London Underground's Station Planning Standards and Guidelines. The Guide to Safety at Sports Grounds guidance, published by the Sports Grounds Safety Authority, includes crowd densities and flow rates in its guidance.

3.2.2 Fruin describes six Levels of Service for walkways (as opposed to stairs or queuing areas) which are illustrated in Fig. 5 over the page.

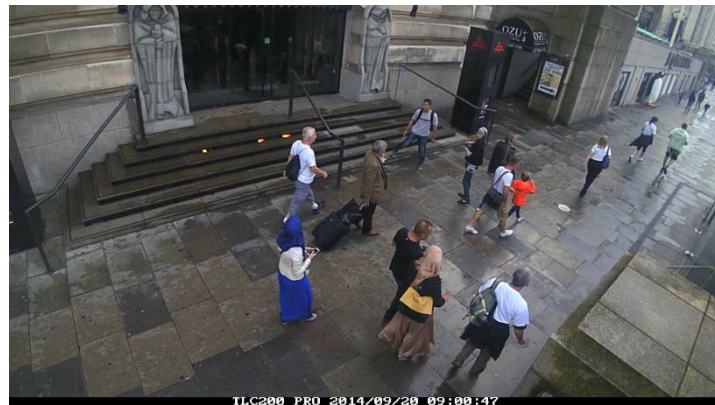
Figure 9 Pedestrian Planning & Design, John J Fruin, 1971 available from Elevatorbooks.com

3.3 TfL Pedestrian Comfort Guidance for London

- 3.3.1 In 2010 Transport for London published its Pedestrian Comfort Level Guidance, 2010, to assist those planning London's streets to create excellent pedestrian environments. It can be downloaded from <https://tfl.gov.uk/cdn/static/cms/documents/pedestrian-comfort-guidance-technical-guide.pdf>.
- 3.3.2 Its focus is on the space needed to facilitate a successful street, in terms of comfort and experience, and therefore usage, rather than a focus on safety. Its guidelines apply to places that require more space than places designed for crowd flow (such as stadium vomitories). Its scope is equivalent to Fruin Levels of Service A to C, i.e., the more comfortable, lower flow rate environments.

² Health and Safety Executive website; <http://www.hse.gov.uk/risk/theory/alarplance.htm>

- 3.3.3 As well as a set of Levels of Service (different and more generous in space/person terms than Fruin's) the Guidance includes more detail than Fruin of the real impact of street furniture based on measurements in London, and the recommended minimum widths for pavements.



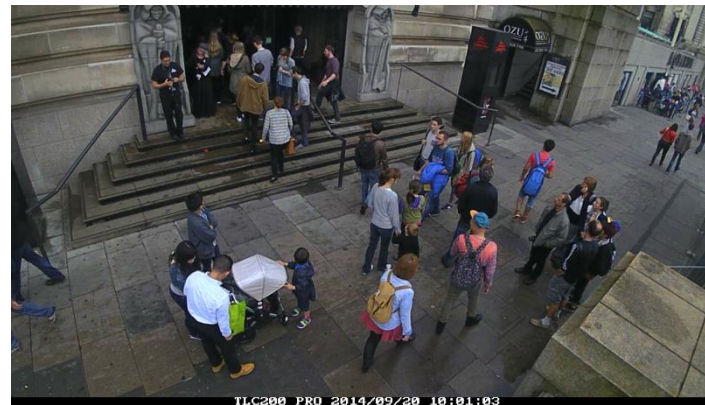
Level of Service A

Flow rate: 0-23 p/m/min

Density: > 3.23 m²/person

Normal walking speed can be freely selected and slower pedestrians can be overtaken easily.

Crossing conflicts can be easily avoided.

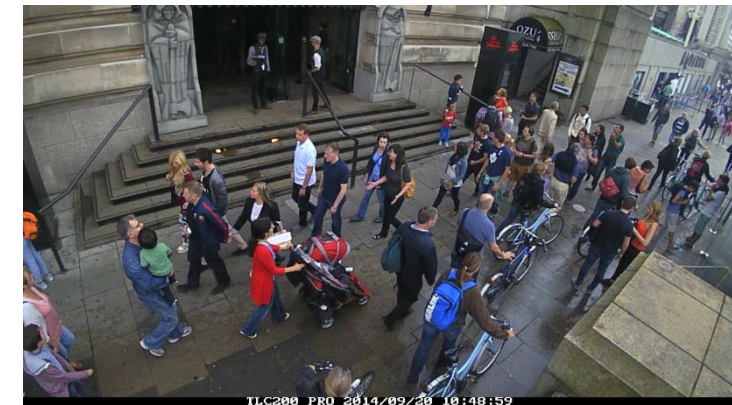


Level of Service B

Flow rate: 23-33 p/m/min

Density: 3.23 - 2.33 m²/person

Sufficient space is available to select normal walking speed and to bypass other pedestrians in primarily one-directional flows. Where there are reverse-direction or crossing movements, minor conflicts will occur.

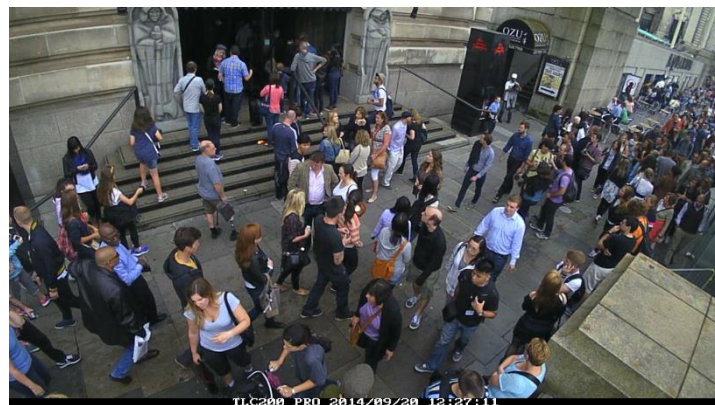


Level of Service C

Flow rate: 33-49 p/m/min

Density: 2.33 - 1.39 m²/person

Restricted ability to select normal walking speed and pass others. High probability of conflict where crossing movements and counter-flows exist. Conflict avoidance requires frequent adjustment of walking speed and direction. However flow is reasonably fluid.

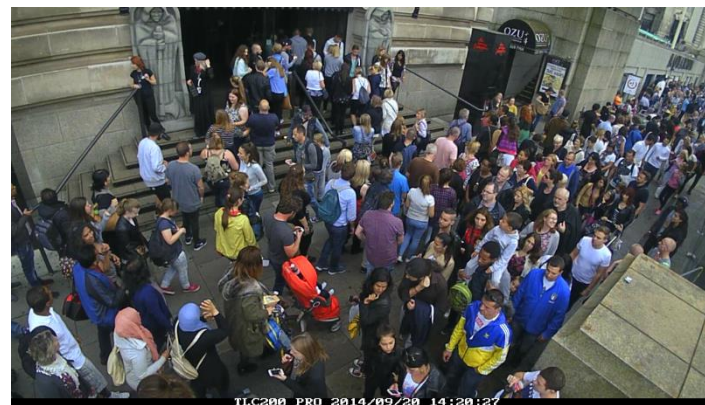


Level of Service D

Flow rate: 49-66 p/m/min

Density: 1.39-0.93 m²/person

Restricted walking speed. Overtaking is difficult, cross-flows are restricted. There is some probability of intermittently reaching critical density, causing momentary stoppages of flow.



Level of Service E

Flow rate: 66-82 p/m/min

Density: 0.93 - 0.46 m²/person

Restricted walking speed and passing ability. Forward movement only by shuffling. Counter-flows and crossing movements extremely difficult. Flow volumes approach limit of walking capacity.



Level of Service F

Flow rate: restricted, lower than LoS E

Density: <0.19 m²/person

Severely restricted walking speed. Frequent contact. Cross-flows are virtually impossible. Pedestrian flow is sporadic & unstable.

Figure 10 Fruin Walking Levels of Service

3.3.4 MS has concluded from a consideration of Fruin that the appropriate target to reduce risk ALARP should be the limit of Fruin LOS A/B (if practicable) and otherwise LOS B provided there is sufficient footway width for minor conflicts to occur without the requirement to step off the pavement. Fruin states that at LOS B there is sufficient space to select normal walking speeds and to bypass other pedestrians in primarily one-directional flows, as is the case outside 746 – 750 High Road in some of the future schemes considered. However, conflicts would still occur considering the high prevalence of groups in a stadium crowd.

3.3.5 At LOS C there is a restricted ability to select normal walking speed and pass others, and consequently a high probability of conflict, and pedestrians will be likely to walk in the road.

3.4 TfL Pedestrian Comfort Guidance for London: Pedestrian Comfort Levels



Figure 11 Transport for London’s Pedestrian Comfort Guidance: Page Pedestrian Comfort Levels

- 3.4.1 Levels PCL A and B would meet the objective of reducing the risk of conflicts to acceptable levels. However PCL A and B are only achievable with very low flow rates which it is not practicable to achieve in the vicinity of a stadium.
- 3.4.2 A lower PCL rating will mitigate the risk ALARP provided that there is sufficient space and opportunity for pedestrians to avoid conflict without stepping into the road. A low rating would therefore require a sufficiently wider footpath.
- 3.4.3 In these circumstances it is considered that an appropriate target to mitigate the risk ALARP is PCLC. PCL D and E will not mitigate conflicts sufficiently to reduce the risk to ALARP and are therefore unacceptable, without further mitigation to prevent people walking into the road.

3.5 Conclusion

- 3.5.1 From a consideration of both standards Fruin LOS A/B equivalent to PCL Guidance C has been identified with a target flow rate of 23p/m/min together with sufficient width in order to reduce the identified crowd safety risk to ALARP.

3.6 Usable widths of footpaths

The measured width of the footpath does not represent the effective width for considering crowd safety issues.

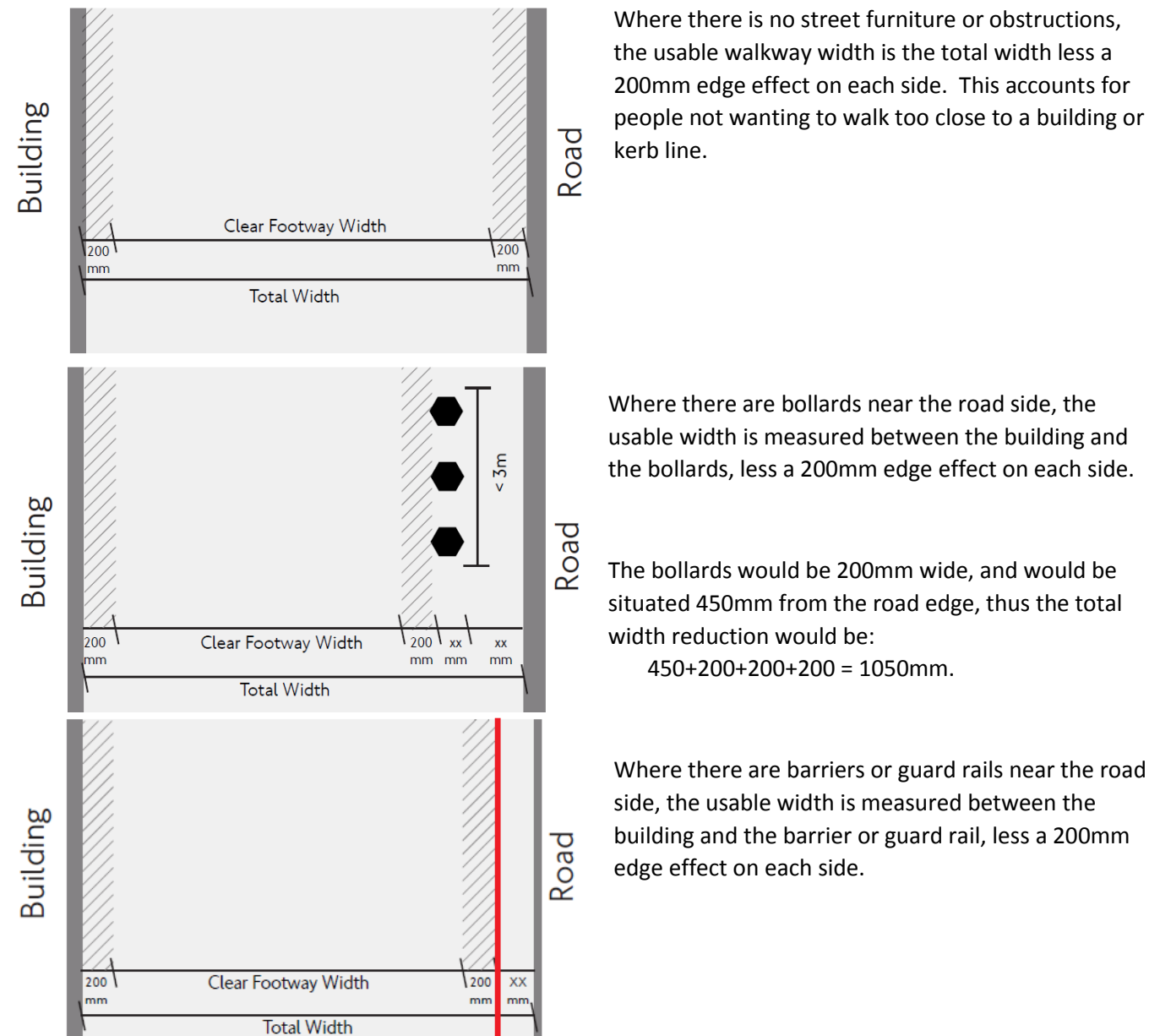


Figure 12 Pedestrian Comfort Guidance on effective usable walkway width to calculate Level of Service

3.7 Minimum widths of footpaths

The Transport for London Pedestrian Comfort guidance copied in Figure 13 below suggests minimum widths for walkways. The forecast non-event weekday evening flow of 640 people per hour puts the current footpath outside 748 and 750 High Road into the Active Flow category. This would require a minimum of 3.3m, or 4.2m if there is street furniture present. Therefore the current footpath is not compliant with the Transport for London Guidance even on a non-event day.

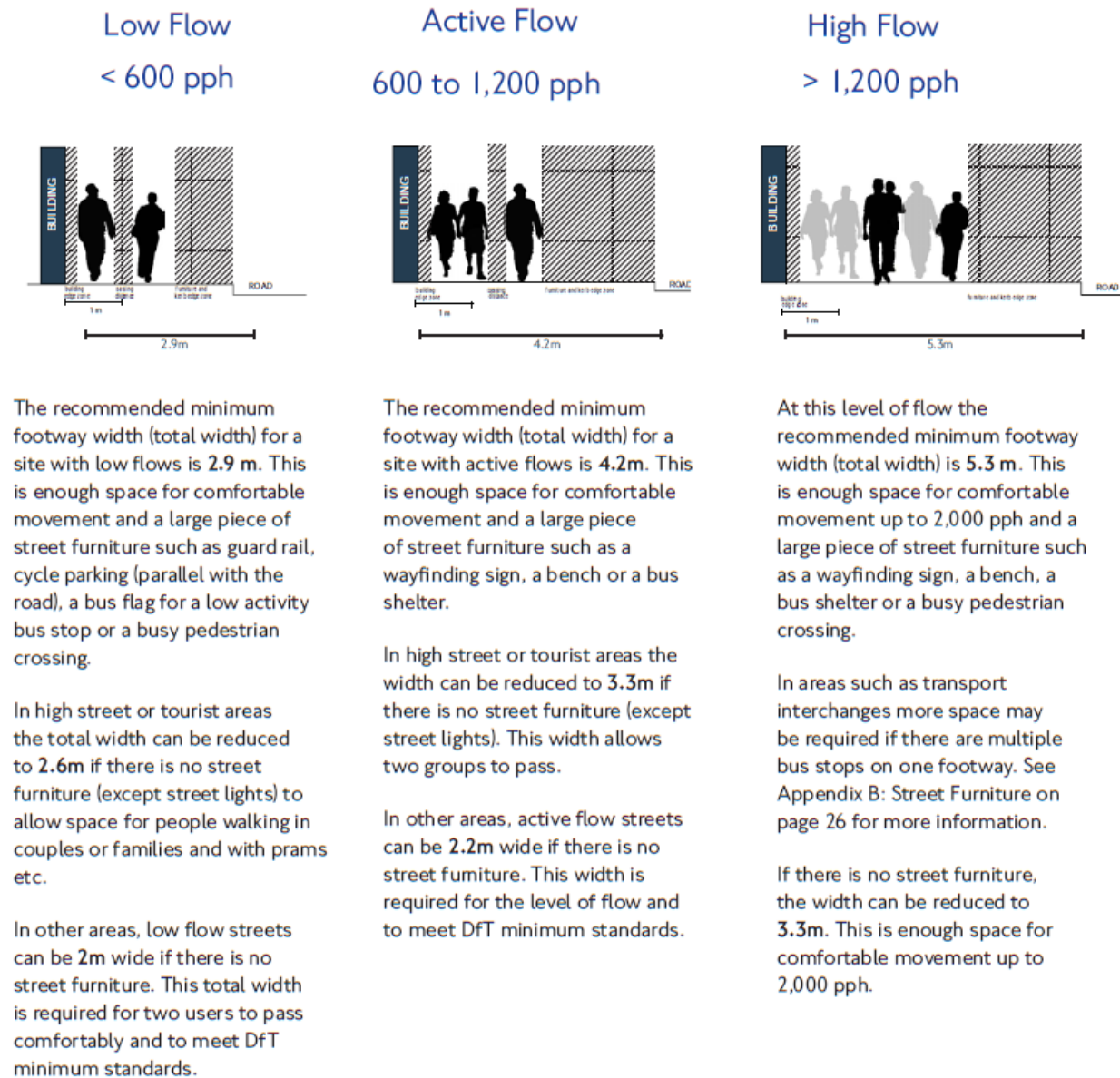


Figure 13 Transport for London Pedestrian Comfort Guidance Page 25: Recommended Widths

4.0 Evaluation of the Proposed and Approved Schemes

4.1 In this section we evaluate the Consented Scheme and the proposed Populous scheme against the identified standards and safety considerations.

4.1.1 This evaluation is based on estimates of the future crowd flows set out in the Major Event Day Transport Assessment 2015.

4.2 Flows considered in this analysis

4.2.1 The following crowd flows have been considered in this analysis

- General attendance spectator movements from transport hubs and local pubs to the stadium seating areas; and
- Flows to and from the Club shop.

4.2.2 The forecasts do not include any flows associated with:

- VIP Spectators who are considered to have entered the stadium outside the peak period; and
- Background pedestrian demand.

4.2.3 The flows do not consider the additional effects of the use of the three buildings for food and beverage uses. The reactivation of these buildings would only increase crowd flow in this area. In addition there would be an inherent conflict between the proposed use of the canyon for general spectator movements with people entering/leaving the buildings particularly if there are large numbers of people drinking outside. The proposed re-use of the three buildings is therefore only likely to act as a further deterrent from the use of the canyon and increase the crowd flow along the High Road in front of the buildings.

4.3 Time Profile

4.3.1 The Transport Assessment identifies a weekday evening kick-off as the worst case crowd flow scenario. A future forecast arrival for a weekday evening match is set out below.

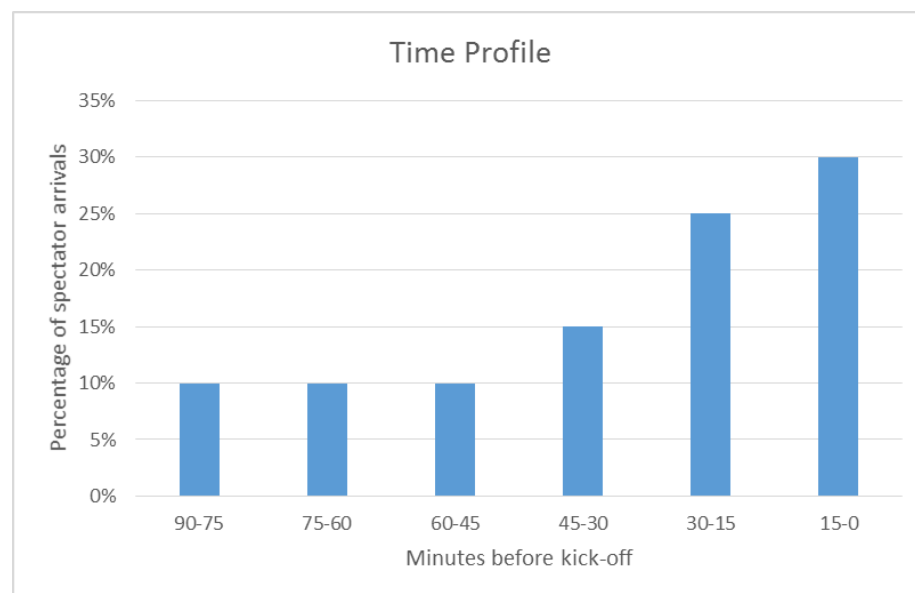


Figure 14 Future forecast arrival profile, Transport Assessment

4.3.2 The crowd flow analysis therefore focuses on the peak 15 minutes arrival during which 30% of people arrive. Figure 15 illustrates the peak flows arising in the Populous scheme.

4.4 The Populous Scheme

4.4.1 In order to reduce the risks arising from pedestrians moving into the road before a match the design has evolved by moving the Tottenham Experience east as far as possible while remaining consistent with the objectives of the scheme to maximise the available pavement width.

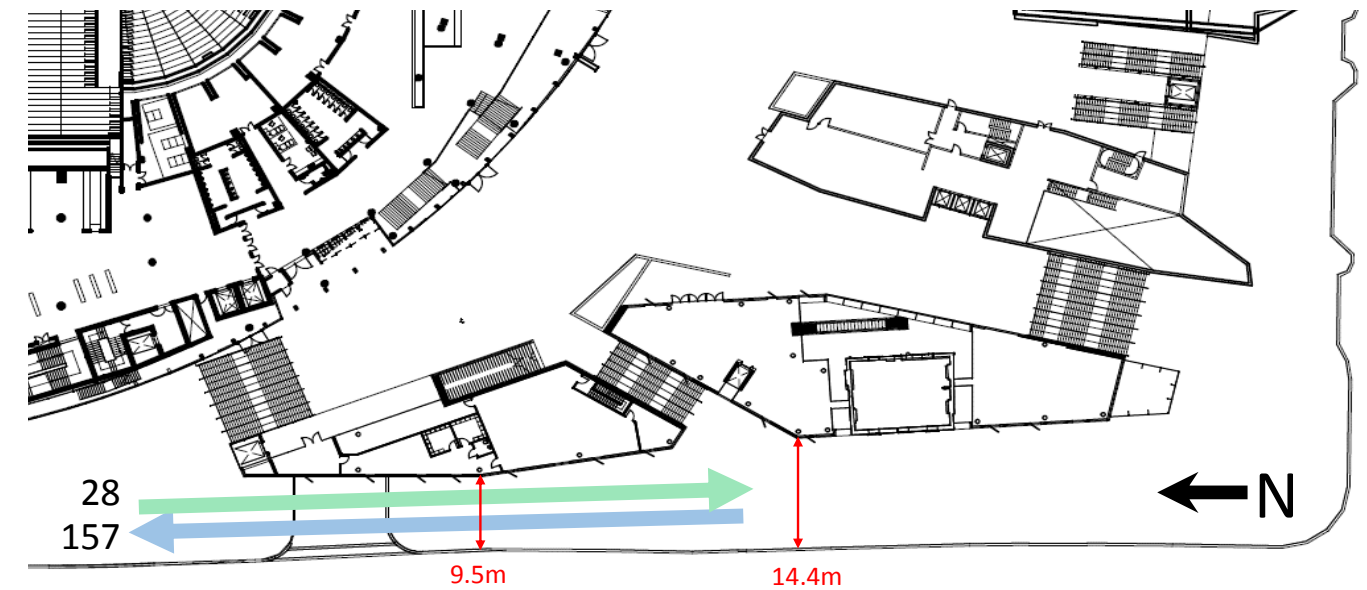


Figure 15 Forecast flows per minute past the bottleneck for the Populous Scheme

4.4.2 The forecast flow is 185 people per minute through the narrowest part of the footpath, which is 9.5m wide. This includes flows for access to and from the Club shop.

4.4.3 The scheme has bollards set back 0.45m from the edge of the road to allow for vehicle overhangs in accordance with the Manual for Streets. The bollards themselves would be 0.2m wide. A further 0.2m is subtracted from the effective width on the inside edge of the bollard and on the building edge. Thus the effective width is 8.45 metres wide.

4.4.4 In addition to this clear width, sited 0.85 metres from the road, there is an additional width between the road and the walkway. This increases the safety of the footpath as people would have to walk more than 0.85m outside of the effective clear width to be within the road.

4.4.5 With the forecast flow of 185 people per minute, the predicted flow rate would be 22 people per metre per minute.

4.4.6 This achieves the target flow rate of 23 people per metre per minute and the desired Fruin Level of Service A, and Pedestrian Comfort Level C. Taken with the increased width of footway, so that any manoeuvring is away from the walkway edge, the Populous scheme therefore reduces the crowd safety risk to ALARP.

4.5 The Consented Scheme

4.5.1 The Consented Scheme has been tested on the same basis. This assumes the retention of the three buildings, and the provision of a 'Canyon' to the rear of the buildings which is intended to divert flows away from the recognised pinch point along the High Road.

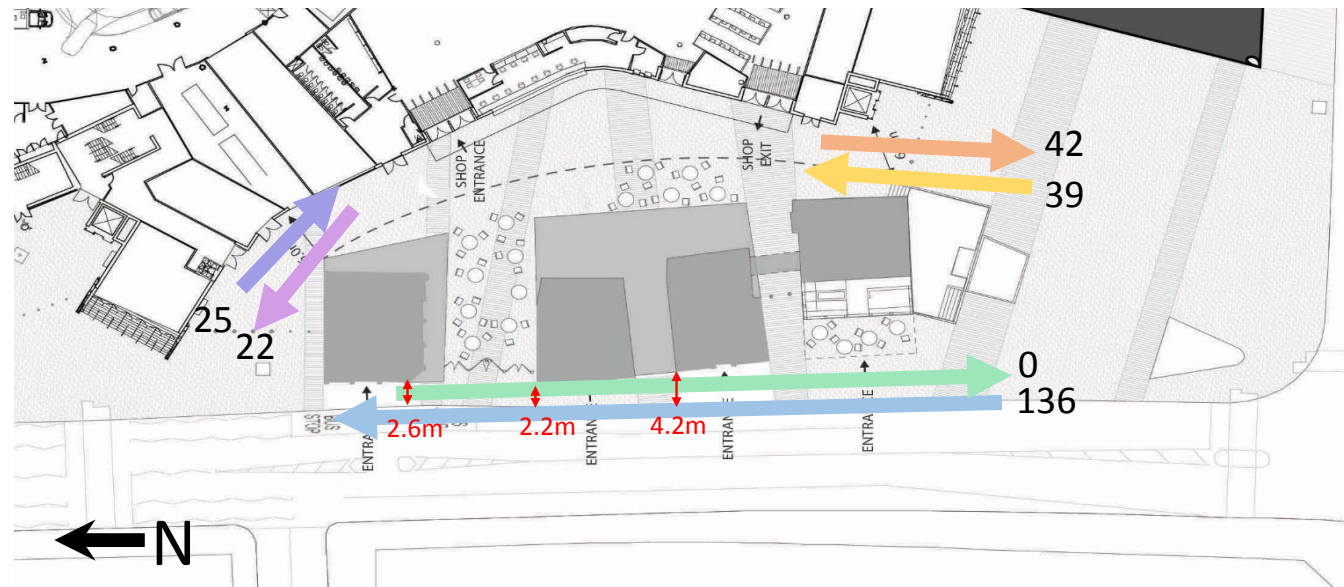


Figure 16 Forecast Flows per minute in the Consented Scheme

4.5.2 It is first necessary to identify the effective width for the Consented Scheme.

4.5.3 In the Consented Scheme, security bollards will be sited between the three buildings rather than between the locally listed buildings and the roadway.

4.5.4 The effective width in front of:

- 746 High Road is 3.8m
- 748 High Road is 1.8m
- 750 High Road is 2.2m

4.5.5 The forecast flow between Park Lane and the north of 750 High Road is 136 people per minute. Although this is shown as one-way, in practice there would be a small amount of contraflow similar to the survey North of Paxton Rd (see section 1).

4.5.6 A further 47 people per minute (25 + 22 p/min) would move between the north and the Club shop. Thus the combined flow to or from the north would be 184 people per minute. 81 people per minute (42 + 39 p/min) would move between the south and the Club shop. Thus the combined flow to or from the south of the stadium is 218 people per minute.

4.5.7 Based on the forecast flows and effective widths, the predicted flow rate in the Consented Scheme (in front of 746-750 High Road) is 76 people per minute per metre equivalent to Fruin Level of Service E. At this flow rate pedestrians are certain to walk in the road. The Consented Scheme does not therefore reduce risk to ALARP.

4.5.8 In order to achieve Level of Service A (23 people per metre per minute) the Consented scheme would need to provide a minimum footpath width of 6.4 metres – close to three times the width actually provided.

4.5.9 The above analysis assumes no general pedestrian movements through the canyon.

4.5.10 If some flows are diverted into the canyon, as was originally anticipated, the crowd flows on the footpath in front of the three buildings would decrease by the same volume to the level of flow through the canyon.

4.5.11 It is therefore necessary to consider the likelihood of general crowd movements through the canyon.

4.5.12 The route through the canyon is longer than the route along the High Road, without a clear line of sight to the end location, and off the desire line. There is no reason for spectators to do this unless they wish to wait for friends entering the Club shop or visiting the possible food and beverage outlets in the three buildings.

4.5.13 The additional flows generated by the reoccupation of the three buildings for food and beverage uses have not been taken into account in this assessment. In accordance with the commercial advice of DCL, the occupier demand for these units would be dependent on having outdoor areas for drinkers and smoking.

4.5.14 Furthermore the volume of demand for these units is likely to be high, and is effectively unconstrained. This presents a further problem of how to manage high volumes of spectators congregating in the canyon and the High Road. Access to the units and queuing would need to be managed so as not to have crowds creating congestion in the canyon. It would be difficult for this to be managed to allow the scheme to operate as intended.

4.5.15 As a consequence, the reuse of the three buildings would create additional flows and groups of spectators gathering to drink and/or waiting for friends which in turn would represent a further significant constraint to free flows through the canyon – acting as a deterrent.

4.5.16 Two examples showing the importance of designing for the desire line are shown below. Even in the case of very minor diversions, the evidence demonstrates that people will take the most direct route.



Figure 17 Design vs User Experience: the design needs to cater for the desire line

4.5.17 A further football example is the informal path created by fans approaching the Emirates Stadium through, Highbury Fields. These fans follow their own desire line, rather than the longer formal route on the path around the park, off the desire line. It is highly likely that a similar pattern would arise in the Consented Scheme.



Figure 18 Spectators on their way to Emirates Stadium in Highbury Fields

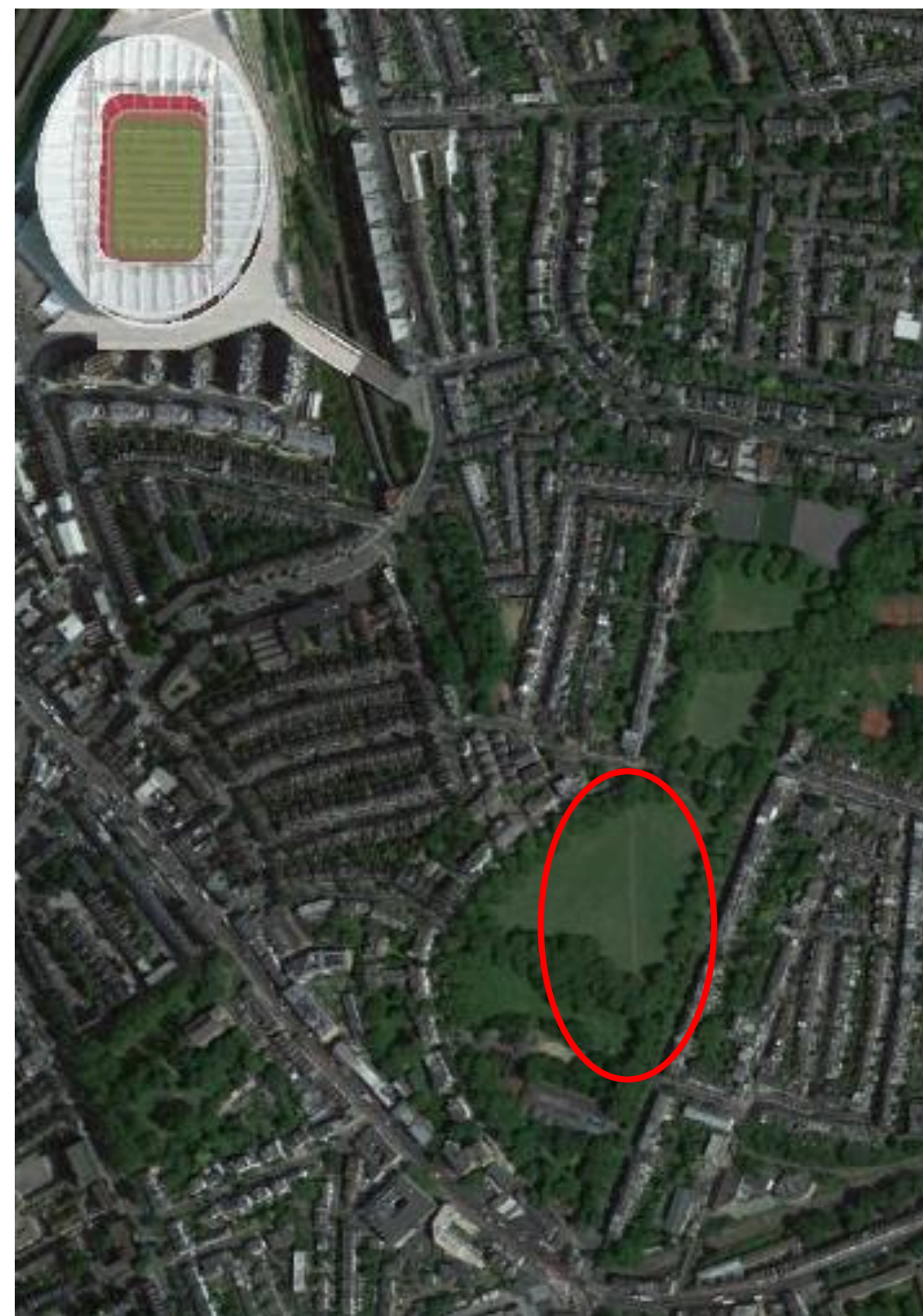


Figure 19 Satellite Imagery from Google Earth showing route across Highbury Fields

4.5.18 Against this background the canyon will not sufficiently reduce crowd flow in front of the three buildings.

- 4.5.19 In order to achieve the target flow rate, 70% of the crowd flow would have to deviate through the canyon. For the reasons set out above MS do not consider that there is a realistic prospect of this percentage of pedestrians choosing to use the canyon.
- 4.5.20 By way of direct comparison as set out above it is predicted that the Populous scheme will achieve a flow rate of 22 people per metre per minute.
- 4.5.21 For the Consented Scheme to achieve the same flow rate as the Populous Scheme 71% of the crowd would be required to use the canyon.
- 4.5.22 Even in the unlikely event that this level of diversion could be achieved, the Consented Scheme would not be as safe as the Populous scheme for the following reasons:
- At low widths people are more likely to manoeuvre round others by walking in the road
 - There is a smaller physical margin at the walkway - road boundary – and not marked by bollards
 - There is less scope for further mitigation – this is explored in the options assessment.
- 4.5.23 In conclusion it is MS's opinion based on these assessments that the Consented Scheme would not achieve the target flow rate and Level of Service necessary to reduce the volume of pedestrians walking in the road and would not therefore reduce the crowd safety risk to ALARP.**
- 4.5.24 Furthermore it is MS's opinion backed up by empirical evidence and TfL Comfort Guidance that the 2.2m width provided in the Consented Scheme would be too narrow to be ALARP for a new stadium.**

5.0 Alternative Options

- 5.1 Having concluded that the Consented Scheme would result in unacceptable crowd safety conditions, the team has examined alternative options to seek to retain the three buildings, to deliver the required levels of service and comfort levels, and to reduce risks to ALARP.
- 5.2 On the basis that our starting point has been to try to retain all the NDHA, the range of options tested is largely based upon the consented scheme, and how this could be adapted to make this scheme acceptable in crowd safety and transportation terms. We have also considered the viability and deliverability of each option.
- 5.3 The list of options is broadly in ascending order of physical intervention. The options analysed are in summary:-
1. The Consented Scheme with no crowd management
 2. The Consented with barriers and stewarding and policing
 3. The Consented Scheme with temporary closure of the Southbound bus lane
 4. The Consented Scheme with permanent closure of the Southbound bus lane
 5. The Consented Scheme with the temporary closure of both Southbound lanes
 6. The Consented Scheme with the temporary closure of both Southbound lanes and contraflow on the Northbound carriageway
 7. The Consented Scheme moving High Road westwards
 8. The Consented Scheme and shared surface on the High Road
 9. The Consented Scheme with a tunnel the High Road
 10. The Consented Scheme and Flyover above the High Road
 11. The Consented Scheme and pedestrian Bridge/walkways over the three buildings
 12. The Consented Scheme with an increased Podium
 13. The Populous Scheme
- 5.4 The more radical options raise very significant issues in terms of their impact on viability, deliverability, programme, and ultimately in some cases are likely to cause significant harm to other heritage assets, but are included for the sake of completeness. A full evaluation of each option is set out in section 8.0.

6.0 Viability and Deliverability

- 6.1 In parallel with the review of technical flow and crowd safety issues THFC has considered the viability and deliverability of alternative options to retain the three buildings.
- 6.2 The delivery of the new stadium is a critical component of the wider regeneration strategy for the area, and in particular the requirements of THFC and the NFL. Any significant delay to the delivery of the scheme would severely prejudice the wider regeneration aspirations held by LB Haringey, the GLA and central government.
- 6.3 Notwithstanding these wider issues, the practical impact of retaining the three buildings requires careful consideration in the light of the detailed crowd flow analysis.
- 6.4 This report should be read in conjunction with the addendum report prepared by Davis Lyons Coffey, which considers the commercial viability of the reuse of the three buildings. The most appropriate, and only viable commercial use identified is for food and beverage uses.
- 6.5 The report sets out how the ground floor areas of each of the buildings would need to be accessed and arranged (including the need for associated outdoor space) in order to accommodate the requirements of food and beverage operators.
- 6.6 The provision of external spaces to the rear would have a significant impact on the canyon, which already represents a narrow space, illustrated by the section below.

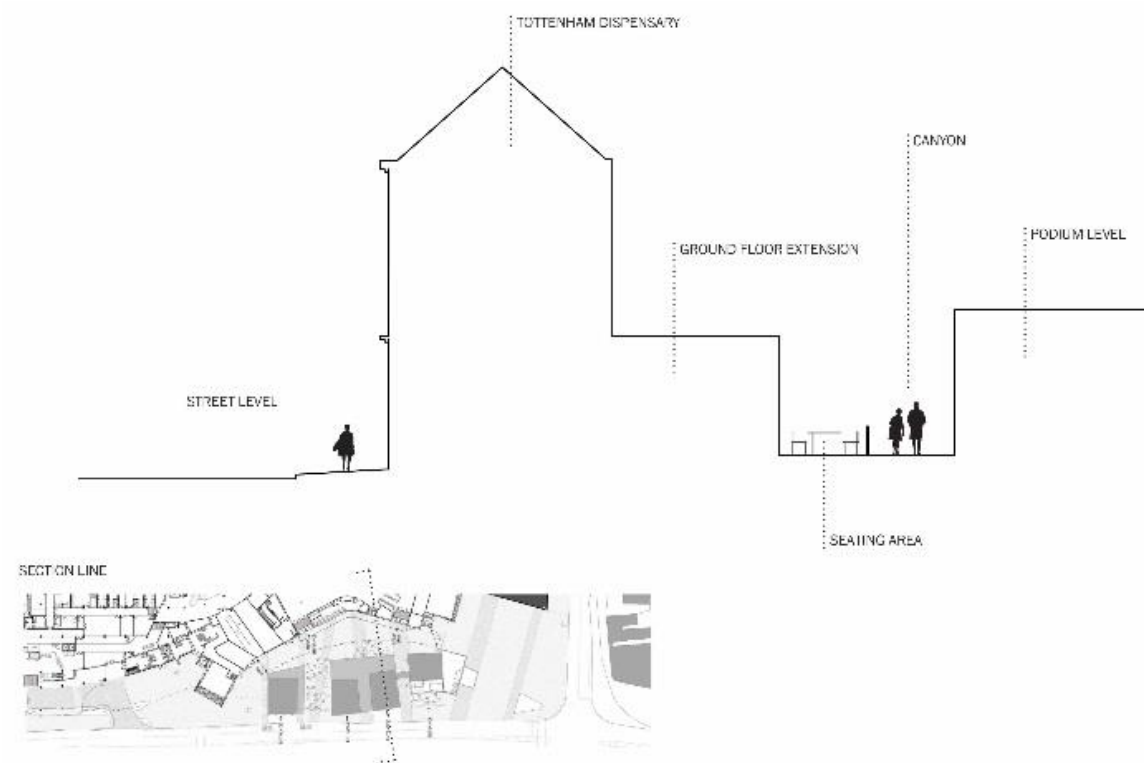


Figure 20 Cross-section showing the canyon

- 6.7 The way the buildings would need to be operated in order to accommodate viable uses has a material impact upon some of the options considered in the assessment, including for example:

- Any entrances to these buildings on the High Road would create additional flows through the existing constraints, and would create new counter- and cross-flows, both of which would exacerbate congestion, including on non-match days;
 - On match days any crowds waiting or assembling outside entrances on the High Road would restrict flows and need to be managed (which would itself create congestion) to prevent people spilling into the road or further into the carriageway, which would be difficult to achieve;
- As a consequence, any entrances on the High Road would have to be closed on match days reducing commercial viability;
- External spaces and entrance/exits to external spaces in the canyon could be provided. However, these spaces (and therefore capacities) would have to be limited and contained to avoid congestion in the canyon. Severe congestion in the canyon would prevent spectators' access the stadium or the Club shop, and even less than severe congestion (including queuing for F&B) would encourage use of the High Road through the pinch point. Management controls would be needed to control access and any queuing in the event that demand is high, and it would be difficult in practice to prevent congestion for commercially successful F&B uses.
 - On non-match days entrances / exits on the High Road would create cross-flows in a narrow pavement, which may push people into the road, when it is not expected by drivers of vehicles and buses. We have considered whether entrances on the High Road would be viable on non-match days for the options;

- 6.8 There is a fundamental conflict between the retention of the three buildings for their optimum (and only) viable use, and achieving acceptable crowd conditions which reduce risks to ALARP.
- 6.9 The evidence suggests that either the buildings would fail to attract occupiers capable of operating within the constraints imposed on the buildings and/of the reuse would lead to unacceptable risks to public safety.
- 6.10 The closure of the bus lane and southbound lanes of the High Road would lead to significant traffic and highways issues, outlined in the following section.
- 6.11 The delays and uncertainty associated with seeking such controls, given the limited justification and wider impacts arising, would seriously affect the programme and delivery of the stadium and wider regeneration of the area.
- 6.12 The more radical options, involving the relocation of the High Road, provision of a tunnel/flyover or elevated bridge would all impose significant additional costs and delays on the scheme, even if feasible. The viability of the Project is marginal at present, and as a consequence any additional costs associated with such major infrastructure works would make the scheme unviable and unfundable.
- 6.13 Furthermore, even if a sound technical case could be put forward for such measures, the costs, delays, uncertainty and traffic and heritage impacts of those proposals would be entirely disproportionate to any benefits realised.
- 6.14 In practice, none of these options would be viable or deliverable. The only option which is deliverable, acceptable in highways terms, and which reduces risk ALARP is the Populous Scheme.

7.0 Transport

- 7.1 The preceding chapters explain the crowd safety risk that will arise in the Consented Scheme.
- 7.2 The assessment of any alternative proposal to resolve this issue needs to consider the impact on the transport strategy for the new stadium and the wider highway network.
- 7.3 The transport strategy is complex and relies on the full exploitation of the transport services on the High Road and in the Tottenham area generally. The stadium is being actively promoted as a 'Public Transport Destination'. On major event days there will be extensive parking controls in both Haringey and Enfield that will oblige spectators to switch to more sustainable transport modes. THFC has set a modal split target of 77% of football spectators arriving in the vicinity of the stadium by non-car modes.
- 7.4 The only compromise to this strategy is that the High Road is closed to all traffic during the busiest part of the post-event dispersal period.
- 7.5 The crowd safety issue that is the subject of this report therefore exists solely in the pre-game situation. Consideration has been given to the feasibility of closing the High Road before a match to seek to resolve the crowd safety issue.
- 7.6 After the match the auditorium is empty 10 minutes after the final whistle and only small numbers of spectators will remain in the building – mostly those enjoying corporate entertainment. Although one of the aspirations of the Stadium Travel Plan will be to retain a greater percentage of spectators in the stadium for a longer period after the end of the match.
- 7.7 The majority of spectators disperse from the local area very quickly and therefore the High Road is able to be re-opened 30 minutes after the final whistle depending upon advice from the police.
- 7.8 There is an unavoidable requirement to close the High Road for a short period to allow the spectators to disperse because of the location of the stadium immediately adjacent to a Strategic Road. This closure results in significant local traffic congestion which often takes an hour to clear.
- 7.9 In contrast before a match the stadium area becomes progressively busier over a longer time period – 90-120 minutes before kick-off depending on the day of the game and its significance. The issues of pre match crowd management and safety are compounded by spectators arriving, meeting, and drinking in the vicinity of the stadium before the game.
- 7.10 The closure of the High Road for a short 30 minute period before kick-off (replicating the position after a game) would not therefore resolve the crowd safety issue. In practice the High Road would need to be closed for a considerably longer period – likely to be at least two hours before a game.
- 7.11 The temporary road closure after the game requires the implementation of bus and general traffic diversion routes. The post-match closure is implemented 5 minutes before the final whistle and is easy to implement because the traffic and pedestrian levels at that time are generally quite low – in contrast to the situation before a game. These bus and general traffic diversion routes would need to be implemented before a match.
- 7.12 The existing bus diversion after the game takes the services a mile away from the stadium which is very inconvenient for general travellers and means that there are no post-match bus service available in the High Road corridor for spectators.
- 7.13 Whereas the current post match all-traffic diversion might only apply for 30 minutes after the final whistle, the buses divert to the east side of the stadium well in advance and don't return to a full service for over 1 hour after the game.
- 7.14 In all likelihood if the road was closed pre-match (together with the existing post-match diversions) the buses would never return to the High Road for the period between the closures.
- 7.15 In practice the bus diversions are likely to be operate for at least 4 hours every event day.
- 7.16 This would have significant implications for spectators, local residents reliant on these services as well as travellers using these routes to travel longer distances on the network but who would ordinarily pass through this stretch of the High Road.
- 7.17 Any proposal to close part or all of the High Road before a game, could result in traffic congestion over an extended period in the approach routes to the stadium. This congestion would arise at a time when the stadium is fully occupied and in the worst-case situation could persist for the full duration of the of the road closure – potentially over 4 hours.
- 7.18 This traffic congestion would result in disruptions to access to the stadium by emergency service vehicles. All 3 emergency services would be equally disrupted which would be a significant concern for the Stadium licensing body (Stadium Advisory Group as led by LBH Building Control). There will be a number of ambulances stationed on site but they could only deal with a small incident.
- 7.19 There will also be a police vehicle presence but those vehicles would need to be able to quickly move around the area to respond to calls for assistance. Fire tenders do not sit on site because they respond to calls from the fire station base and different incidents require different response vehicles.
- 7.20 Included below are two key plans which are proposed to be implemented with the new stadium to minimise the disruption caused by the short-term post-match closure of the High Road. The east side diversion for buses and general traffic is much shorter than the existing west side diversions by between 1 and 3 km. However, both would result in significant additional disruption.
- 7.21 The first priority is to divert buses by as little as possible in terms of travel distance and for the least possible time. Highway improvement works have been completed at the High Road junctions at Northumberland Park and Lansdowne Road to make the diversions possible in terms of the vehicle swept paths.
- 7.22 If the diversion was also to be pre-match the precise timings would determine the management strategy. However it would never be advisable to divert HGV's into what are residential areas.
- 7.23 If large number of cars were diverted to the east side over an extended period it would cause significant congestion for the diverted buses, which would defeat the object of the strategy.
- 7.24 The implementation of these proposed measures for the extended period would not therefore satisfactorily resolve the likely impacts on the wider transport network caused by the pre-match closure.
- 7.25 As a result the closure of part or all of the High Road before a game is likely to both prejudice the transport strategy for the stadium and adversely impact upon the wider highway network.

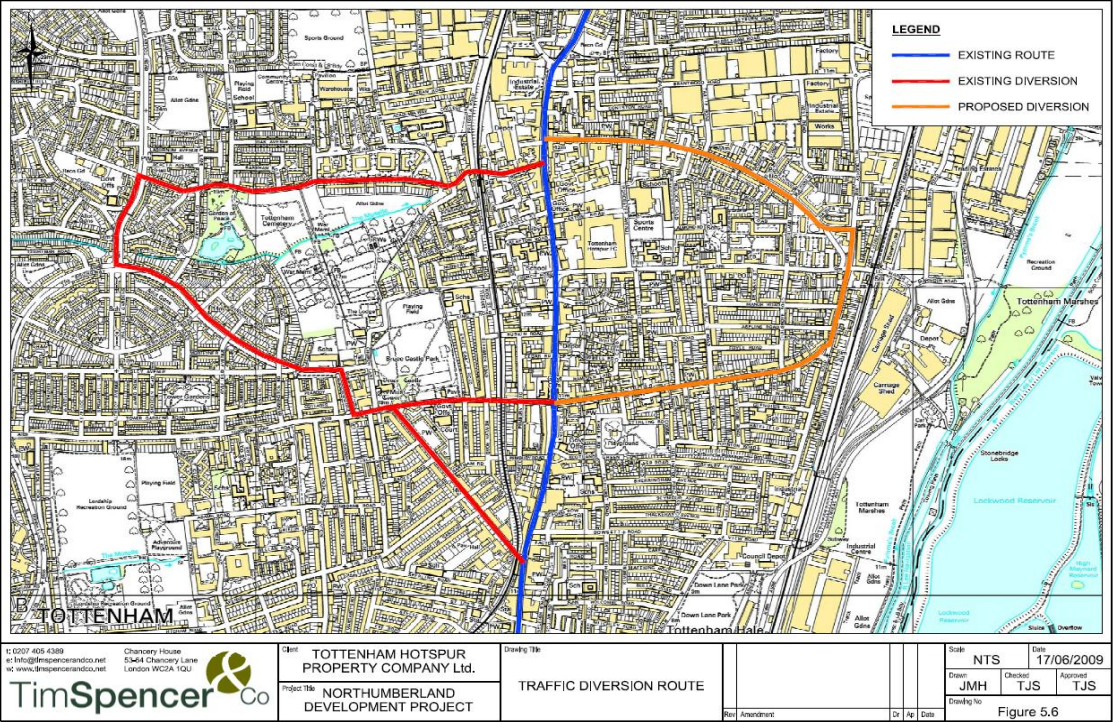


Figure 21 Traffic Diversion Routes

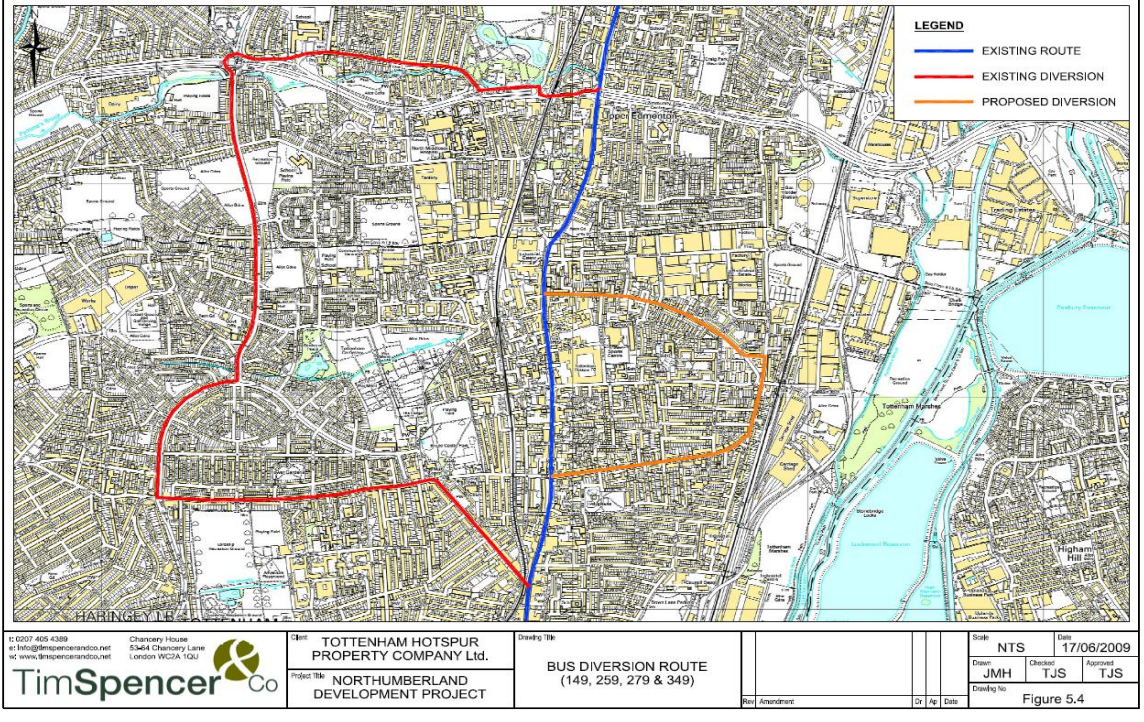


Figure 22 Bus Diversion Routes

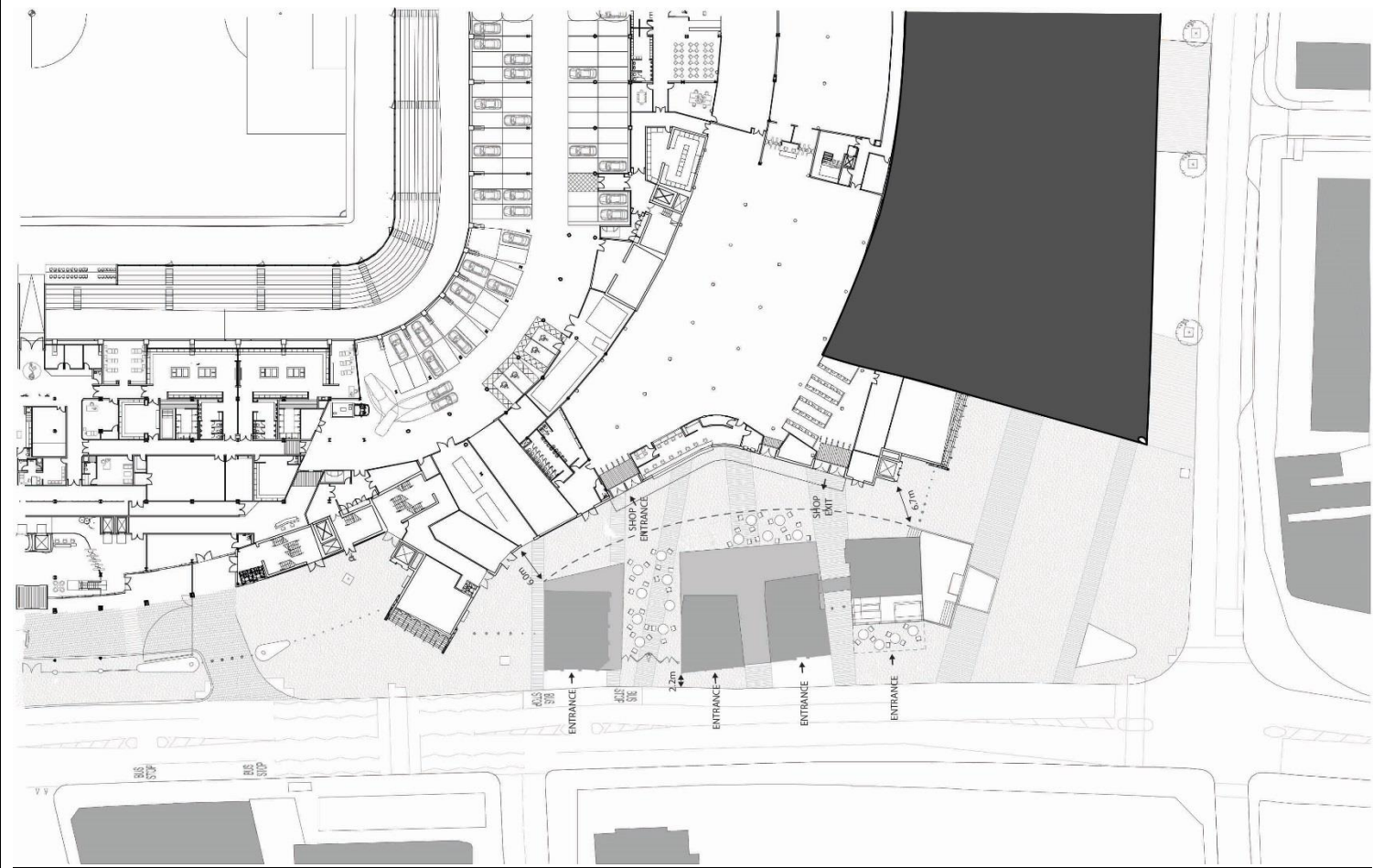
8.0 Evaluation of Each Option

1. KSS Consented Scheme with No Crowd Management

Assessment

OPTION SUMMARY

- The consented KSS scheme (HGY/2010/1000) with no additional crowd management.



CROWD SAFETY

Assessment against Target Flow Rate:

The forecast for the flow per minute for the peak 15 minutes between Park Lane and the north of 750 High Road is 136 people per minute, (which excludes the flows for the Club shop), although this forecast excludes any demand created by provision of Food and Beverage.

This scheme is predicated on fans moving through the ‘canyon’ behind 744 - 750 High Road.

Assuming no diversion through the canyon and the flows along the High Road through a 2.2m width (1.8m considering edge effects) gives a flow rate of 76 people/metre/minute (Fruin LOS E).

At this flow rate pedestrians will be certain to walk in the road.

However, the spectators’ desire line and shortest route is along the High Road, and most will continue to use that route.

It would require 70% of forecast match day flows to divert through the canyon to achieve LOS A/B.

It is very unlikely that this level of diversion would be achieved. The scheme will not therefore achieve the objective of reducing risks to pedestrian safety to ALARP.

If the three buildings are used for Food and Beverage retail then entrances/exits cannot be retained on the High Road on match-day due to increasing demand, congregation and cross flows on the High Road. If access is provided to the rear than the external areas - and the capacity - of the three buildings would have to limited and contained, to avoid congestion in the canyon. Access to the buildings via the canyon, and queuing outside the buildings would have to be controlled to prevent high volumes of spectators gathering outside the F&B units, and this would be difficult to achieve. This could block circulation through the canyon and access to the Club shop. Management of over-demand for the F&B units at the entrances to the canyon, while allowing access and circulation, would also be difficult to achieve.

The re-use of the buildings will also increase crowd flows and congestion in the canyon, which will deter pedestrians from using that route.

Additional safety issues:

The kerb edge is a trip hazard which adds the possibility of slip/trip/fall.

Even if the target flow rate was achieved the narrow footpath width means that pedestrians will step into the road to avoid conflicts made more likely by the presence of groups of spectators.

The width at the pinch point is less than recommended by the TfL Comfort Guidance section 3.6 (minimum 3.3m) for an ‘Active flow’ environment (>600p/hr; 10p/min).

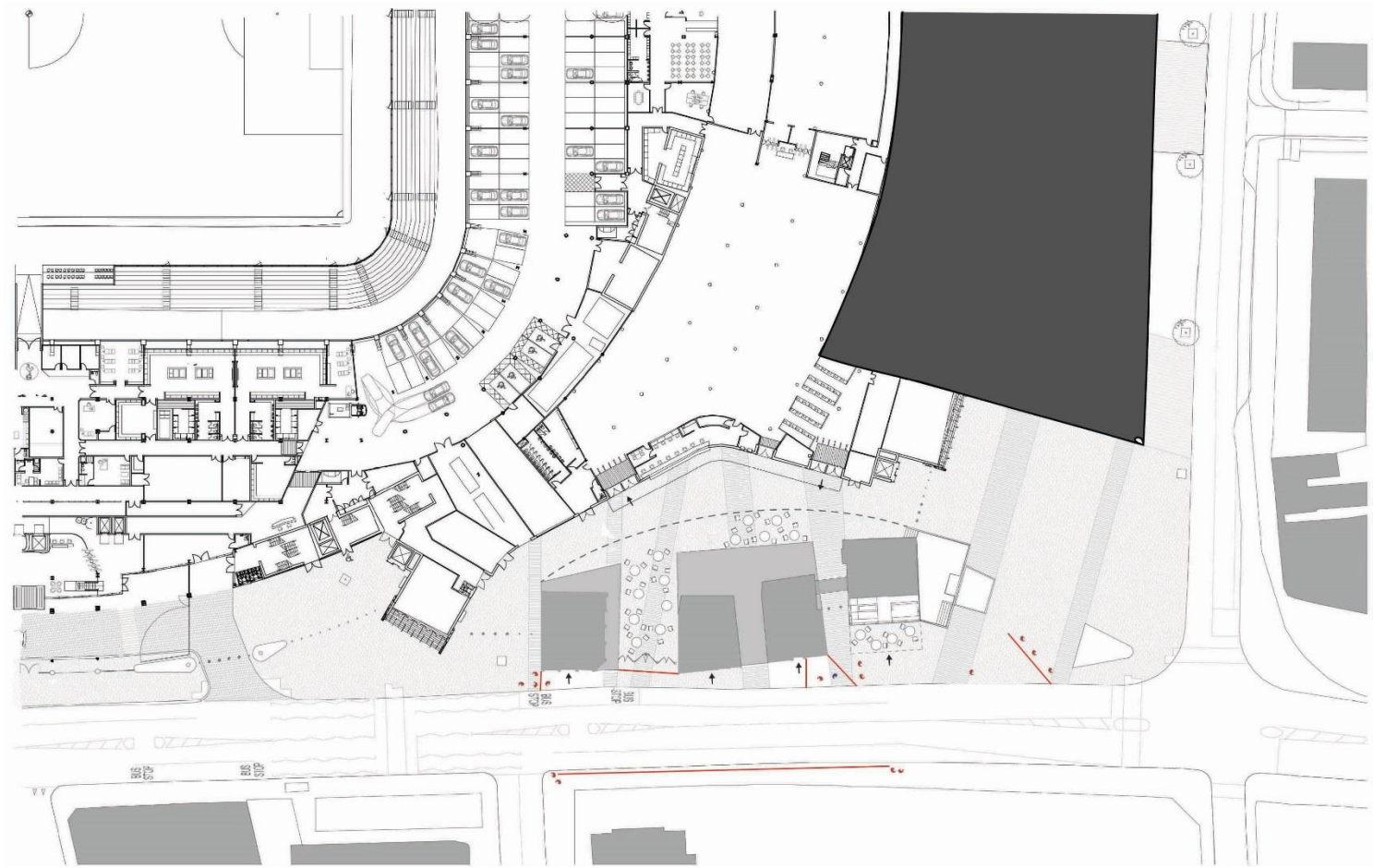
	HIGHWAYS AND TRANSPORT The existing southbound bus stop would need to be relocated further north perhaps to a point in front of the west side corporate spectator access or be removed without replacement.
	DELIVERABILITY This option depends on securing suitable occupiers for the three buildings. The optimum, and only viable use will be for F&B, and this use is dependent on match and event day trade. DCL advise that the units are currently too small to attract F&B operators (the only potential commercial occupier) without external space. The Crowd Flow Analysis demonstrates that entrances on the High Road are not viable in the base KSS option because of conflicts with crowd flow. They would exacerbate an already unacceptable and unsafe situation. External space in the Canyon will need to be limited and contained, with access managed and any queuing tightly controlled, which is likely to be difficult with risk that it cannot be achieved. This will impact upon the viability of the three buildings.
	CONCLUSION The scheme will not work as intended, with most pedestrians expected to continue using the High Road rather than the canyon and therefore not achieve the objective of reducing risks to pedestrian safety to ALARP. The footway width at the pinchpoint is less than recommended by TfL. 746-750 High Road do not appear viable.

2. Consented Scheme with Barriers & Stewarding & Policing

Assessment

OPTION SUMMARY

- Consented scheme with insertion of physical barriers on eastern and western pavements enforced by stewarding and Policing to close stretch of pavement between 746 and 750 High Road.
- Formalise non-use of 'bus lane'.



CROWD SAFETY

This management solution requires compliance from spectators and successful management over the lifetime of the project.

It contemplates 100% of the crowd flow using the canyon.

The predicted flow through the canyon in this option is 218 people/minute people, which includes football spectator flows associated with the Club shop (although flows for the Club shop during a NFL match are likely to be higher).

The Canyon is 6.7m wide less 0.4m edge effect. The predicted flow rate per metre is therefore 35 people/metre/minute representing LOS C.

Furthermore, this flow does not include any crowd flows or congregation associated with the use of three buildings for F&B. Access to the buildings from the High Road would be blocked on match day in this option.

The external areas - and the capacity - of the three buildings would have to be limited and contained, to avoid congestion in the Canyon. Access to the buildings via the canyon, and queuing outside the buildings would have to be controlled to prevent high volumes of spectators gathering outside the F&B units. This could block circulation through the canyon and access to the Club shop. Management of over-demand for the F&B units at the entrances to the canyon, while allowing access and circulation, would be difficult to achieve.

In any event spectators and other pedestrians will want to follow their natural desire line.

It will be difficult to achieve 100% compliance of spectators and other pedestrians using the canyon. It is very likely that some pedestrians will try to walk round the barriers, or move along the High Road from before the barrier line to bypass the system, or cross in the road demarcated by the barrier line.

When this occurs there will be a higher risk for the individuals than exists currently or as proposed in the Consented Scheme, as non-compliant spectators will have their attention focused on stewards rather than vehicles. Vehicle drivers will not expect pedestrians in the road, and stewards and police would also be at risk of conflict with vehicles if they step out to block the paths of non-compliant spectators.

Even if 99% of spectators comply approximately 68 people will be in the road outside these buildings during the ingress period before each match.

The eastern footpath closure may cause increased use of the western footpath. Any people that choose to walk road-side of the western barrier there would find themselves stuck between vehicles and the barrier.

It will not be apparent to pedestrians why the diversion is necessary increasing frustration for people that have to walk further. Police and stewards would be instructing people to walk the long way around, off their desire line, and away from the path they can see goes where they want, to one with limited visibility. This may lead to some frustration/aggression from spectators in conflict with Police and stewards.

If the solution is not successful, the risk is built-in for the lifetime of the stadium.

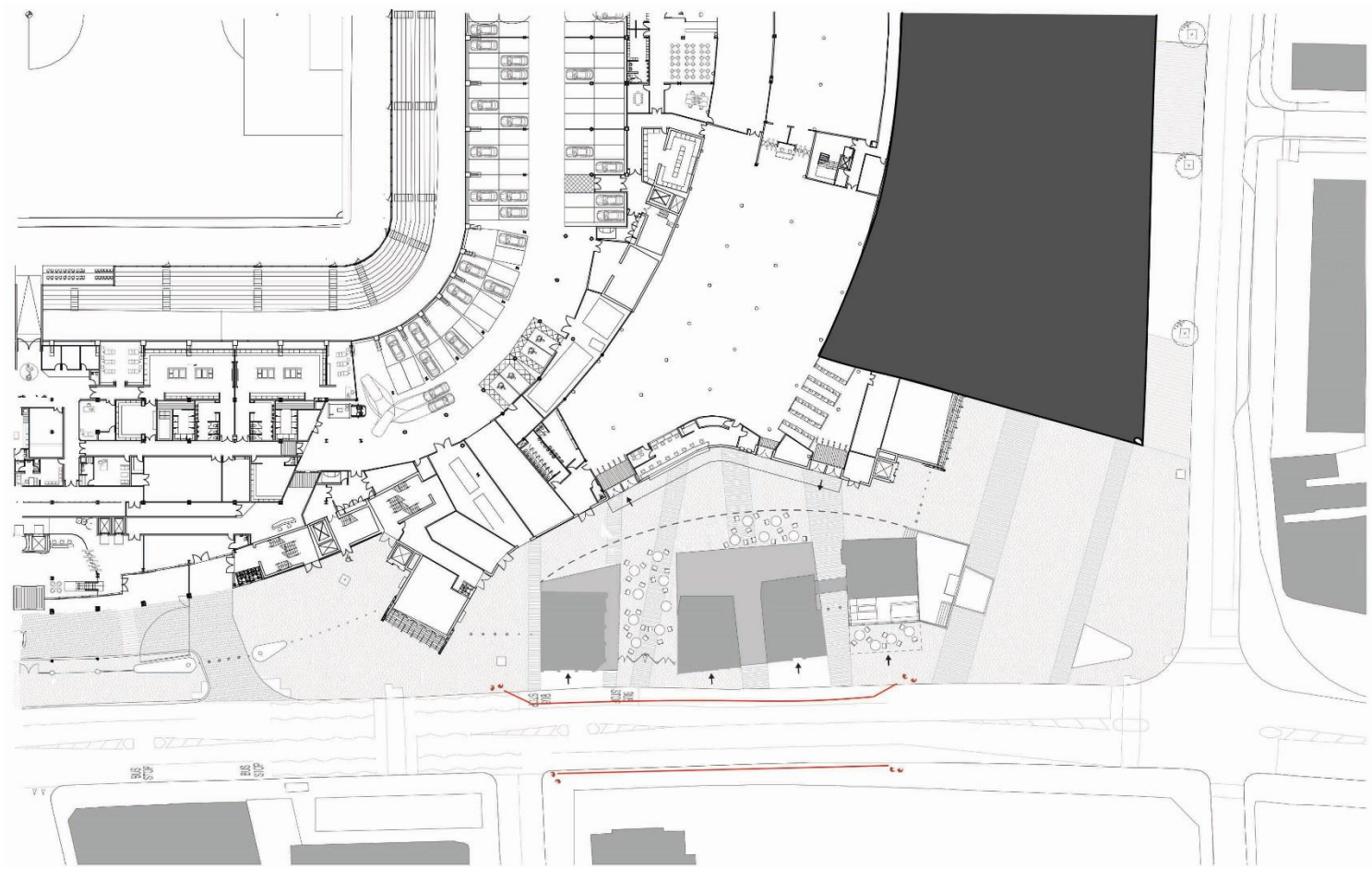
	HIGHWAYS AND TRANSPORT The southbound bus stop would need to be relocated further north for example to a point in front of the west side corporate spectator access or be removed without replacement. The traffic management restrictions would need to be implemented at the very least an hour and a half before the start of the major event.
	DELIVERABILITY The same issues apply as Option 1. The introduction of barriers would remove any prospect of entrances/access to the three buildings from the High Road on match days, channelling all the through the Canyon. The resultant conflicts with crowd flow would require additional intensive management and may impact upon external space provided for each of the buildings. This would further undermine the commercial viability of these units for F&B operators.
	CONCLUSION This option relies on successful management and pedestrian compliance of spectators and other pedestrians throughout the lifetime of the project for pedestrians to not be on the road. This is very unlikely to be achieved. The scheme does not allow for access to 746-750 High Road from the High Road on match day. The use of 746-750 High Road as F&B will create significant crowd management issues, likely to make the scheme unworkable due to the risk of severe congestion in the canyon and on the High Road. The risks of this scheme are built in for the lifetime of the stadium and there is little opportunity to provide further risk mitigation should it be required It does not achieve the objective of reducing the risk ALARP

3. Consented Scheme with Temporary Closure of the Southbound Bus Lane

Assessment

OPTION SUMMARY

- Consented scheme with temporary closure of southbound road both pre and post-match
- Barriers at western edge of road supported by stewards
- Temporary rerouting of bus services
- Allows pedestrians to use 'bus lane'
- Barriers along road



CROWD SAFETY

The narrow point would now be 5.2m wide outside 748 High Road. Accounting for a 0.4m edge effect, the usable width would be 4.8m. Subtracting a further 1m for a barrier set back from vehicle traffic 3.8m is available for crowd circulation.

The forecast for the flow per minute for the peak 15 minutes between Park Lane and the north of 750 High Road is 136 people per minute, (which excludes the flow for the Club shop).

The forecast flow of 136 people per minute through this bottleneck (assuming no diversion to the canyon) gives a flow rate of 36 people/metre/minute (Fruin LOS C).

If there is some limited diversion via the canyon then the width could be LOS B. Although this forecast excludes any demand created by provision of Food and Beverage.

This LOS is worse than the targeted LOS A. It is likely that some people would walk on the wrong side of the barriers putting themselves at increased risk.

The temporary barriers proposed for this option would increase the risk for pedestrians who find themselves in the roadway. Those people would be stuck between barriers on both sides of the road and vehicles for over 60m. That would put them at increased risk of a severe collision with a vehicle. Whilst the number of people in the road way would be reduced by the barriers, the increased risk for those in the roadway would increase the risk overall. This option does not reduce the risk to ALARP.

Additionally the kerb edge would form a trip hazard. With this management solution directing people to walk diagonally across and parallel to this level change, it is almost certain to cause minor injuries. This would be an unacceptable risk which would not be consistent with reducing the risk to ALARP.

This trip hazard would require mitigation such as making the roadway at the same level as the kerb. Such mitigation would require TfL approval and would not be feasible. The kerb is necessary for the safety of pedestrians at times when the barriers are not in place to separate vehicles and pedestrians. Without the kerb some form of protection such as bollards, barrier or guard rail would be needed. The 2.2 metre width is already too narrow and would not be sufficient to accommodate bollards, barrier or guard rail.

Entrances to 746 – 750 on the High Road would not be operationally viable due to the impact on crowd flow. The external space at the rear would have to be bounded to allow circulation in the canyon, and control of access and queuing to the rear of the buildings external space when demand is unconstrained would require crowd management to prevent the risk of severe congestion in the canyon. This would be difficult to achieve while allowing circulation and access to the Club shop

The width at the pinch point is less than recommended by the TfL Comfort Guidance section 3.6 (minimum 3.3m) for an 'Active flow' environment (>600p/hr; 10p/min).

HIGHWAYS AND TRANSPORT

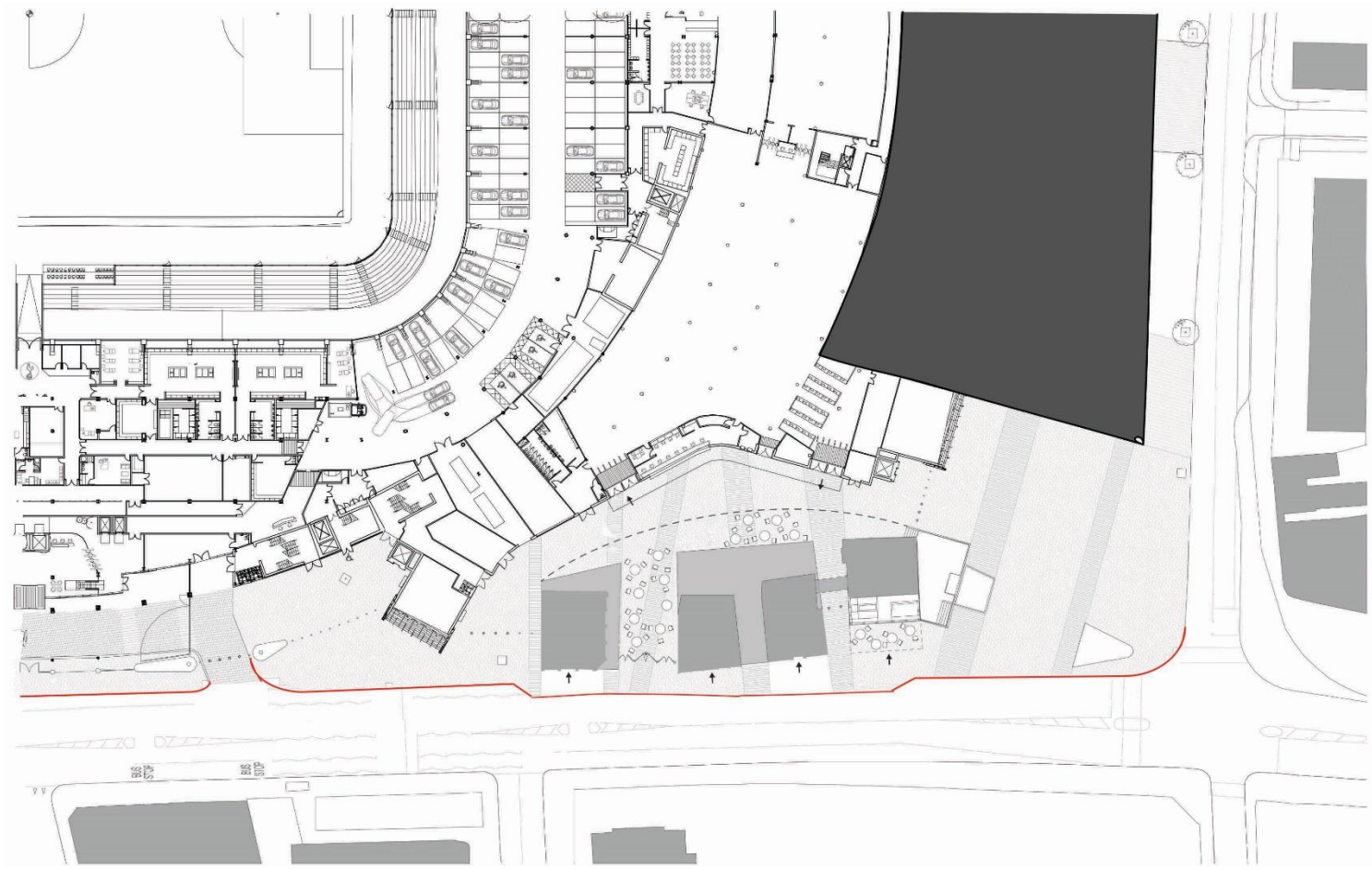
	The temporary 50-60 metre kerb build out would interfere with the new proposed pedestrian crossing of the High Road and the southbound bus stop. Buses would continue to use second southbound lane. Any additional traffic management measures/restrictions would result in a modest risk of causing local traffic congestion which would result in disruptions to access by emergency service vehicles. All 3 emergency services would be equally disrupted which would be a concern for the Stadium licensing body (Stadium Advisory Group as led by LB Haringey Building Control). DELIVERABILITY Access to the three buildings from High Road would not be achievable in this option. The requirement for external space to the rear still creates conflicts between the F&B use and the crowd flow through the Canyon. The external space at the rear would have to be bounded to allow circulation in the canyon, and control of access and queuing to the rear of the buildings when demand is unconstrained would require crowd management to prevent the risk of severe congestion in the canyon. As such, in terms of deliverability, there is no improvement on Option 1. The ability to secure a viable economic use for the three buildings is still uncertain. CONCLUSION This option relies on successful management and compliance of spectators and other pedestrians throughout the lifetime of the project for pedestrians to not be on the road. This is very unlikely to be achieved. It introduces additional risks for any spectators or other pedestrians not following the system, the vehicle drivers at risk of collision, and risks to the staff implementing the system. The option builds in a trip hazard, which is almost certain to cause minor injuries. It does not achieve the objective of reducing risk ALARP. The scheme does not allow for access to 746-750 High Road from the High Road on match day. The use of 746-750 High Road as F&B will create significant crowd management issues, likely to make the scheme unworkable due to the risk of severe congestion in the canyon. Therefore the operational and commercial viability of the use of 746-750 High Road for F&B is uncertain. The risks of this scheme are built in for the lifetime of the stadium and there is little opportunity to provide further risk mitigation should it be required.
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4. Consented Scheme with Permanent Closure of the Southbound Bus Lane

Assessment

OPTION SUMMARY

- Consented scheme with permanent closure of southbound road
- Increase width of pavement in front of 746 – 750 High Road
- Permanent rerouting of bus services



CROWD SAFETY

The narrow point outside 748 High Road would be 5.2m wide.

Accounting for a 0.4m edge effect, the usable width would be 4.8m. The forecast flow of 136 people per minute through this bottleneck gives a flow rate of 28 people/metre/minute (Fruin LOS B). This exceeds the proposed target flow rate.

The boundary of the walkway would be against the busier central road lane. People walking into this lane are at greater risk than people walking into the outside southbound lane in the other options.

People move to avoid pedestrian - pedestrian conflicts even at low flow rates so a risk remains during peak ingress periods.

Barriers and stewards could be introduced as further mitigation along both eastern and western pavements (this latter to stop informal crossing into a barrier on the eastern side) to manage this risk as per option 3.

However, introduction of barriers would reduce the available width and increase the flow rate, and creates risks described in other options: any non-compliant spectators or other pedestrians would now be forced into the main carriageways, where there would be more traffic.

Entrances to the three buildings from the High Road would not be viable for match-day as no queuing, waiting or congestion can be allowed on this stretch of walkway.

External space at the rear would have to be limited and contained to allow circulation in the canyon, and control of access and queuing to the rear of the buildings external space when demand is unconstrained would require crowd management to prevent the risk of severe congestion in the canyon. Queueing into the F&B would have to be controlled, while allowing circulation and access to the Club shop, which would be difficult to achieve.

HIGHWAYS AND TRANSPORT

The southbound nearside lane is painted red as a “bus lane” however it is available for general traffic at most times when there would be a major event at the new stadium. The operational hours of the north to south bus lane are 7am till 1pm Monday to Friday (and occasionally Saturday)

It is still a traffic lane used by a large number of buses and general traffic does tend to avoid the use of the bus lane even when it is not operational.

The removal of this lane to create a wider walkway, would need to satisfy highway design standards.

The longer permanent 100+ metre kerb build out would interfere with the new pedestrian crossing of the High Road and the southbound bus stop as well as removing the local bus priority at all times.

Any additional and permanent traffic management measures/restrictions would result in a significant risk of causing local traffic congestion which would result in disruptions to access by emergency service vehicles. All

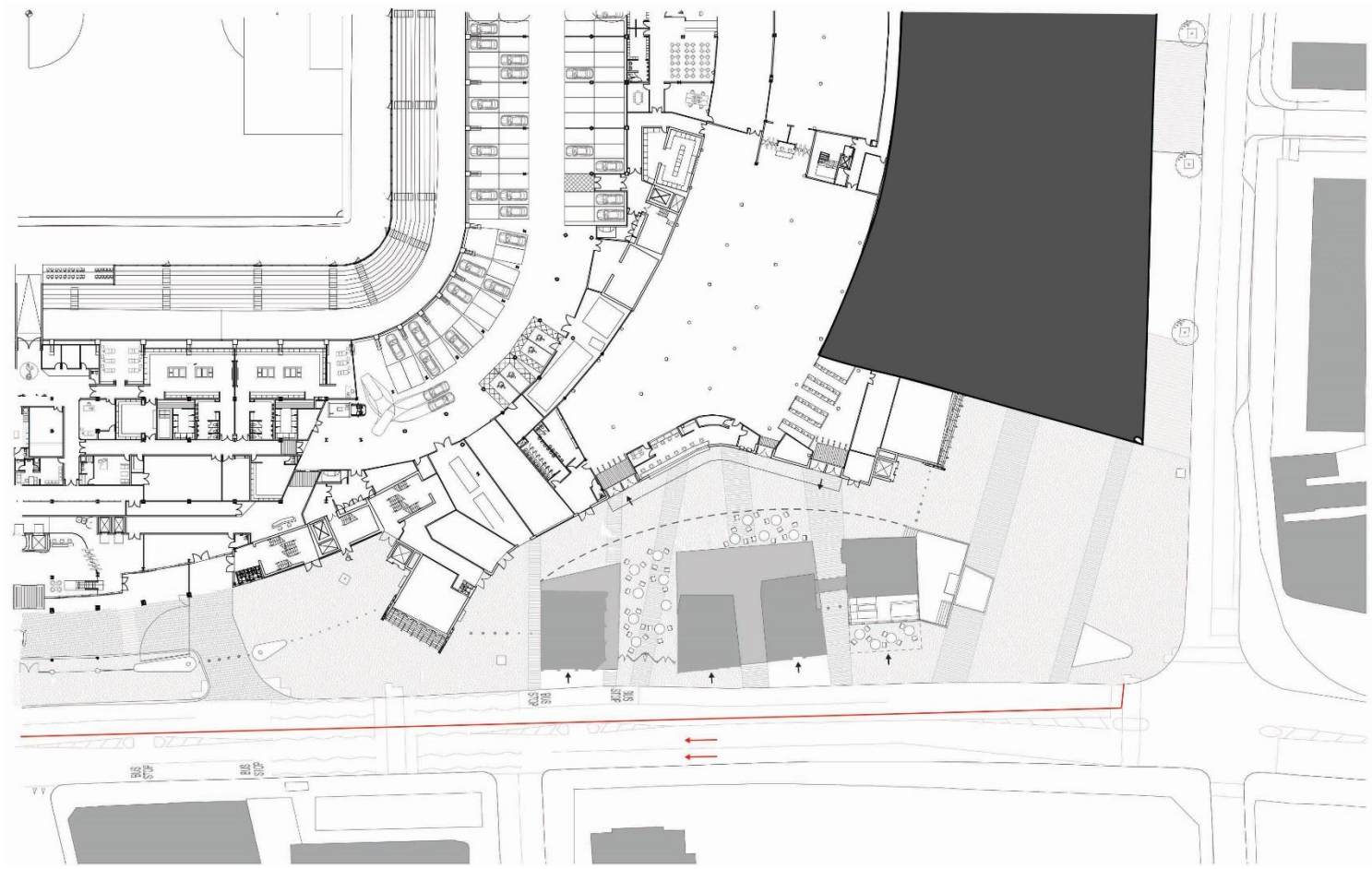
	3 emergency services would be equally disrupted which would be a concern for the Stadium licensing body (Safety Advisory Group as led by LBH Building Control). The permanent removal of a section of the road to provide the increased walkway width would cause delays to each and every bus service which would amount to a substantial financial penalty in terms of social and economic dis-benefits. This section of the High Road is a strategically important bus corridor – particularly so given the level of use during the weekday commuter AM peak periods.
	DELIVERABILITY There is a marginal improvement as it creates more space in front of the three buildings outside event days, but the viability of reoccupying the buildings for F&B and their ability to operate satisfactorily in this option remains uncertain.
	CONCLUSION This option moves the pedestrian – vehicle boundary to the central carriageway, where any pedestrians straying into the road are at risk of pedestrian-vehicle conflicts. The conditions would be LOS B making it more likely that pedestrians will step into the road than other options. This can be managed by introduction of barriers and stewards, but then this retains the risk arising from spectator non-compliance as in option 3. It does not provide as much space or as low flow rates as other options. It does not achieve the objective of reducing the crowd safety risk ALARP. The scheme does not allow for access to 746-750 High Road from the High Road on match day. The use of 746-750 High Road as F&B will create significant crowd management issues, likely to make the scheme unworkable due to the risk of severe congestion in the canyon. Therefore the operational and commercial viability of the use of 746-750 High Road for F&B is uncertain. The risks of this scheme are built in for the lifetime of the stadium and there is little opportunity to provide further risk mitigation should it be required.

5. Consented Scheme with Temporary Closure of Both Southbound Lanes

Assessment

OPTION SUMMARY

- Consented scheme with temporary closure of southbound lane and road pre- and post-match
- Temporary increase in width of pavement to include road
- Rerouting of bus services and southbound vehicular traffic



CROWD SAFETY

This would deliver a significant benefit for crowd flow.

The narrow point would now be approximately 8.2m wide. Accounting for a 0.4m edge effect, the usable width would be 7.8m. The forecast flow of 136 people per minute through this bottleneck gives a flow rate of 17 people/minute (Fruin LOS A).

The road-walkway boundary could be demarcated by a barrier, if required, in the second lane to provide a buffer vs. traffic however this would put people at risk of being stuck between the barrier and a vehicle lane.

On match day, entrances to 746 – 750 High Road would need to be controlled to prevent queueing and assembly outside the buildings on the High Road, which would require stewarding and be difficult in practice (itself likely to create congestion). There is also the problem of managing demand so that any queueing or waiting outside the buildings does not become unmanageable. Access to the front of the buildings is not recommended. There is a risk of congestion in the canyon, preventing access to the Club shop.

Additionally the kerb edge would form a trip hazard. With this management solution directing people to walk diagonally across and parallel to this level change, it is almost certain to cause minor injuries. This would be an unacceptable risk which would not be consistent with reducing the risk to ALARP.

This trip hazard would require mitigation such as making the roadway at the same level as the kerb. Such mitigation would require TfL approval and would not be feasible. The kerb is necessary for the safety of pedestrians at times when the barriers are not in place to separate vehicles and pedestrians. Without the kerb some form of protection such as bollards, barrier or guard rail would be needed. The 2.2 metre width is already too narrow and would not be sufficient to accommodate bollards, barrier or guard rail.

The width at the pinch point is less than recommended by the TfL Comfort Guidance section 3.6 (minimum 3.3m) for an ‘Active flow’ environment (>600p/hr; 10p/min) on non-match-day.

HIGHWAYS AND TRANSPORT

Pre-match bus diversions to the west of the stadium (the existing post-match diversion) would result in increased operating costs and reduced passenger revenue.

Pre-match bus diversions to the east of the stadium (a modified diversion) would also result in increased operating costs and reduced passenger revenue. It is very unlikely that diverted bus services would ever return to the High Road during the major event.

This would be an issue at any time but particularly in the tail of the weekday evening peak hour. The priority of the bus operator is to maintain the bus frequency, per hour, and average waiting time, minutes per bus. This is particularly the case for the much longer west side diversion. The west side bus diversion would render the services unusable by spectators pre-match which would undermine the major event transport strategy.

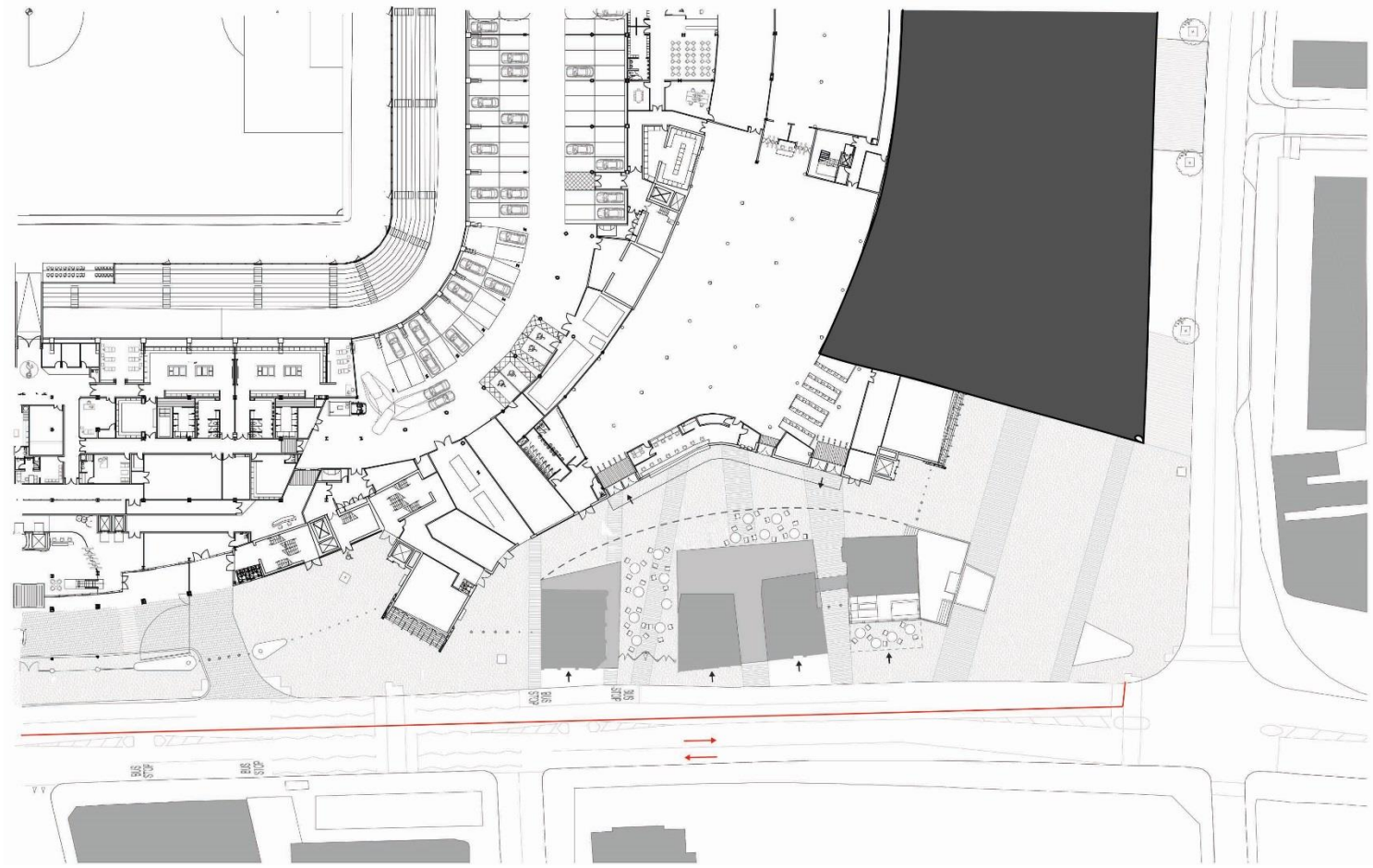
	Up to 10% of spectators are expected to use scheduled bus services pre-match. The west side diversion takes services away from the regeneration area which would result in considerable 'accessibility' difficulties if the diversion was to last up to 4-5 hours. The use of the shorter east side bus diversion would not materially reduce the timescale and inconvenience of the bus diversions. Any additional traffic management measures/restrictions would run a very high risk of causing considerable local traffic congestion which would result in disruptions to access by emergency service vehicles. All 3 emergency services would be equally disrupted which would be a significant concern for the Stadium licensing body (Stadium Advisory Group as led by LBH Building Control).
	DELIVERABILITY As Option 3. This option also depends on the ability to secure the necessary consent for the temporary closure of both southbound lanes, which would be challenging given the issues outlined above. This would also present uncertainty and delay in respect of the delivery of a workable solution.
	CONCLUSION This delivers benefits for crowd flow, but the introduction of a level change introduces risk and the proposal does not reduce risk to ALARP. The option would have a significant detrimental impact on the wider transport issues and in particular the overall transport strategy for the stadium.

6. Consented Scheme with Temporary Closure of Both Southbound Lanes and Contraflow on Northbound Carriage

Assessment

OPTION SUMMARY

- Consented scheme with temporary closure of southbound lane and road pre- and post-match
- Temporary increase in width of pavement to include road
- Contraflow introduced on northbound carriage to allow for two way flow of traffic



CROWD SAFETY

This would deliver a significant benefit for crowd flow. The narrow point would now be approximately 8.2m wide. Accounting for a 0.4m edge effect, the usable width would be 7.8m. The forecast flow of 136 people per minute through this bottleneck gives a flow rate of 17 people/minute (Fruin LOS A).

The road-walkway boundary could be demarcated by a barrier, if required, in the second lane to provide a buffer vs. traffic.

On match day, entrances to 746 – 750 High Road would need to be controlled to prevent queueing and assembly outside the buildings, which would require stewarding and be difficult in practice (itself likely to create congestion). There is also the problem of managing demand so that any queueing or waiting outside the buildings does not become unmanageable. Access to the front of the buildings is not recommended. There is a risk of congestion in the canyon, preventing access to the Club shop.

Additionally the kerb edge would form a trip hazard. With this management solution directing people to walk diagonally across and parallel to this level change, it is almost certain to cause minor injuries. This would be an unacceptable risk which would not be consistent with reducing the risk to ALARP.

This trip hazard would require mitigation such as making the roadway at the same level as the kerb. Such mitigation would require TfL approval and would not be feasible. The kerb is necessary for the safety of pedestrians at times when the barriers are not in place to separate vehicles and pedestrians. Without the kerb some form of protection such as bollards, barrier or guard rail would be needed. The 2.2 metre width is already too narrow and would not be sufficient to accommodate bollards, barrier or guard rail.

The width at the pinch point is less than recommended by the TfL Comfort Guidance section 3.6 (minimum 3.3m) for an ‘Active flow’ environment (>600p/hr; 10p/min) on a non-match day.

HIGHWAYS AND TRANSPORT

Southbound traffic cannot operate safely as a contra-flow within the northbound carriageway without causing considerable congestion and safety issues.

The existing northbound traffic lane is too narrow to allow temporary 2-way operation so the carriageway would need to be significantly widened coupled with removable street furniture such as, guard railings, traffic islands and traffic signal poles.

All the traffic lights would need to be turned off and covered and the temporary centre line would need to be coned/barriered – there is insufficient width available to do this without undermining the benefit to pedestrians of the temporary carriageway closure

The traffic management restrictions would probably need to be put in place and removed overnight when traffic flows are very low. This would therefore involve the all day closure of the roads and bus stops which would be a particular problem for TfL with regard to midweek fixtures.

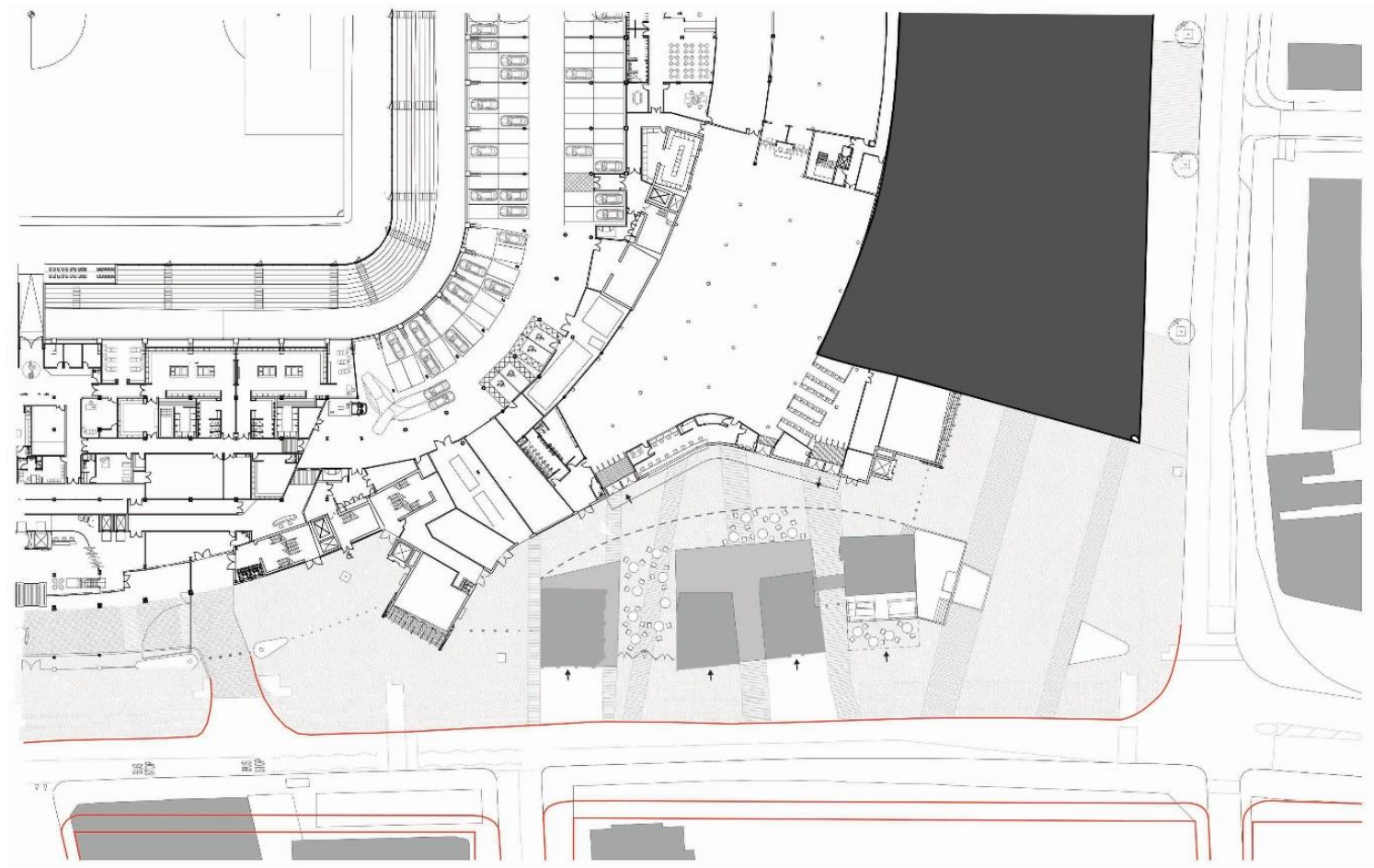
	Any additional traffic management measures/restrictions would run a very high risk of causing considerable local traffic congestion which would result in disruptions to access by emergency service vehicles. All 3 emergency services would be equally disrupted which would be a significant concern for the Stadium licensing body (Stadium Advisory Group as led by LBH Building Control).
	DELIVERABILITY As Option 3. This option also depends on the ability to secure the necessary consent for the permanent closure of both southbound lanes, which would be very challenging given the issues outlined above. This would also present uncertainty and delay in respect of the delivery of a workable solution
	CONCLUSION This delivers benefits for crowd flow, but the introduction of a level change introduces risk and the proposal does not reduce risk to ALARP. This option would have a considerable detrimental impact on the highways network and on the transport strategy for the new stadium

7. Consented Scheme and Move High Road Westwards

Assessment

OPTION SUMMARY

- Consented scheme with increased footpath width on eastern side outside 746 -750 High Road
- Alignment of High Road moved further westwards



CROWD SAFETY

Potentially of significant benefit if the High Road is moved far enough west. If the road is moved 5m west and there are no entrances to 746 - 750 High Road on the High Road then the scheme would provide similar flow rates to the Populous scheme.

With 5m additional width, the total width would be 7.2m at the narrowest point (6.8m considering edge effects). This gives a flow rate of 20 people/metre/minute.

On match day, entrances to 746 – 750 High Road would need to be controlled to prevent queueing and assembly outside the buildings, which would require stewarding and be difficult in practice (itself likely to create congestion). There is also the problem of managing demand so that any queueing or waiting outside the buildings does not become unmanageable. Access to the front of the buildings is not recommended. Congestion in the canyon due to high demand for F&B units would inhibit access to the Club Shop/

HIGHWAYS AND TRANSPORT

There is a strong likelihood that the recent TfL design guidance would support much wider walkways for 365 day activity levels on both sides of the High Road so the impact on existing buildings on the west side of the street might be even greater than shown in the sketch.

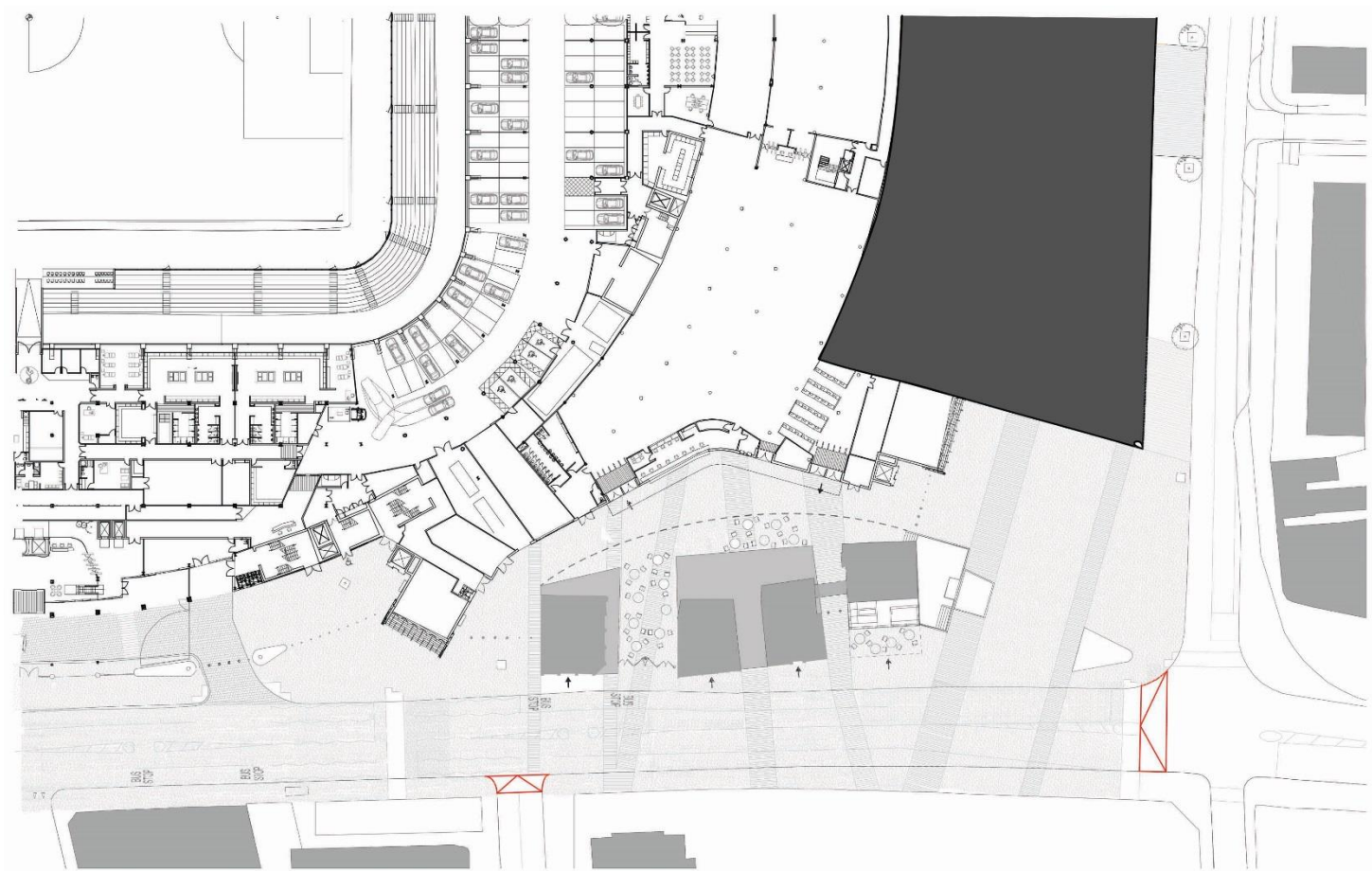
	DELIVERABILITY This improves the commercial attractiveness of the three buildings. However the cost of delivery in terms of highways, utilities, land assembly, and likely impact on other heritage assets make this option undeliverable. It would also impact upon LB Haringey’s wider regeneration aspirations for the High Road West area. This option would fundamentally change the nature of the street, changing the road's historic alignment and would require the removal of designated heritage assets on the west side of the High Road. This would be very harmful to the North Tottenham Conservation Area. There would not be sufficient justification to promote the necessary compulsory purchase order, even if commercial viable.
	CONCLUSION This option would potentially resolve the crowd safety issue but in practice is likely to be undeliverable <u>and</u> would have a greater detrimental effect on the North Tottenham Conservation Area that the proposed Populous scheme. Access to 746-750 High Road used as F&B could be allowed depending on the width available at the front but management of queuing would need to be tightly controlled, which would be difficult if demand is unconstrained. No congregation in the front of the building could be allowed. Constraints would reduce the building’s viability.

8. KSS Consented Scheme and Shared Surface on High Road

Assessment

OPTION SUMMARY

- KSS scheme with shared surface on High Road from Park Lane to White Hart Lane



CROWD SAFETY

As per the Highways and Transport assessment below, a shared space scheme is not feasible on a match day.

Pedestrians would fill the road and present significant risks of pedestrian-vehicle conflicts, particularly if drivers are frustrated by delays.

Crowd congregation, associated with use of 746-750 High Road for F&B, could not be allowed as it would interfere with traffic.

HIGHWAYS AND TRANSPORT

The High Road is a busy and highly regulated street so the light touch shared surface approach would be very dangerous. This would result in substantial numbers of road traffic accidents with the existing level of use of the High Road. High frequency bus services and large pedestrian crossing movements require proper management and regulation. In the pre-event period it is likely that the dominant pedestrian movements would take control of the street and this would result in traffic gridlock.

The High Road traffic flow next to the four building on a typical weekday is over 20,000 vehicles a day including substantial number of buses, coaches and commercial vehicles. This street is not a candidate street for the same shared surface approach adopted at Exhibition Road in Kensington where there are very few buses, coaches or commercial vehicles.

The High Road hourly traffic flows on a weeknight from 6:45 to 7:45, the minimum pre-match traffic management period as assessed in this report, are as follows;

Total vehicles – 1042 (including 84 cyclists)
Car/taxis – 802
Light Goods Vehicles – 85
Medium Rigid Commercial Vehicles – 3
Articulated HGV – 0
Buses and Coaches – 77 (1 every 47 seconds)
Motorcycles - 27

Any additional traffic management measures/restrictions would run a very high risk of causing considerable local traffic congestion which would result in disruptions to access by emergency service vehicles. All 3 emergency services would be equally disrupted which would be a significant concern for the Stadium licensing body (Stadium Advisory Group as led by LBH Building Control).

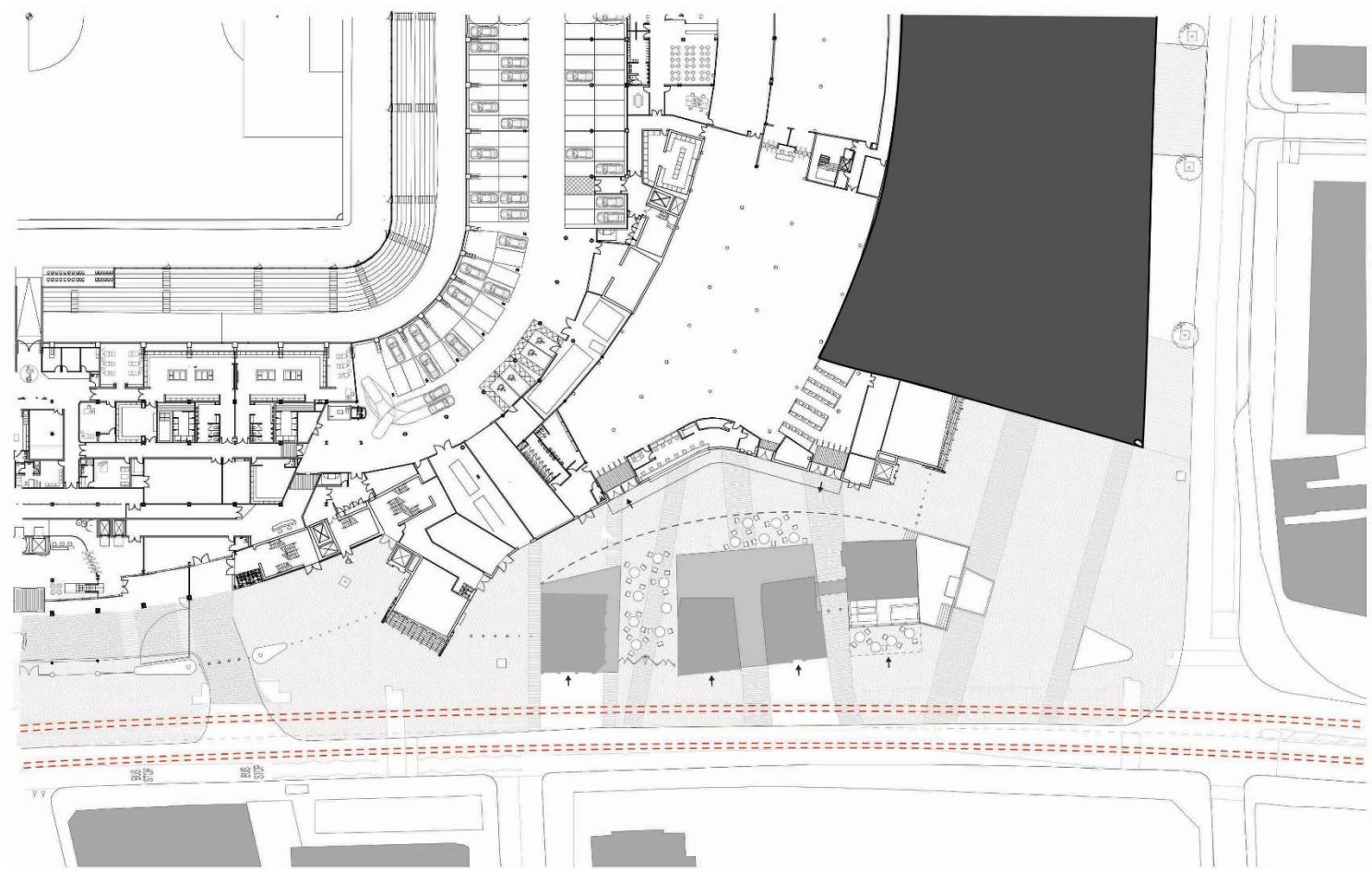
	DELIVERABILITY The viability of three buildings could be marginally improved in this option however for the crowd safety and highways issued described above it is not deliverable.
	CONCLUSION This option is not feasible for the High Road. It would give rise to even greater risk of pedestrian-vehicle conflict and would result in traffic gridlock before a game.

9. Consented Scheme and Tunnel the High Road

Assessment

OPTION SUMMARY

- Consented scheme with vehicular traffic diverted under a tunnel to increase pavement width at ground floor level



CROWD SAFETY

It is assumed that one vehicle lane in each direction would remain, and that this would carry local traffic only. The relative density of vehicles in the tunnel and above ground is not yet known.

The alignment of the remaining lanes would provide need to provide additional walkway width to the eastern side of the High Road, sufficient to provide capacity for spectators to move without the need to move into the road.

If the two remaining vehicle lanes are aligned with the central lanes now but wider, then the additional width would be less than that provided by the road, suggesting that the alignment would need to be towards the western pavement.

Barriers (and supporting stewarding) may still be required to demarcate the pedestrian-vehicle boundary.

HIGHWAYS AND TRANSPORT

It would be very difficult to locate the tunnel portals to the north and south without extensive demolition of existing buildings. The tunnel section would be very expensive to build and would disrupt existing utility services. It would take many years of highly disruptive construction to implement even with the simplest cut and cover option.

The local traffic and bus services would remain at grade in a 2 lane carriageway which would need to be almost as wide as the existing 4-lane cross-section.

DELIVERABILITY

This would change the nature of the street and would significantly harm this Conservation area (and potentially others) as well as any HAs in the vicinity of the tunnel entrances. While adjacent to the application site a tunnel would lead to an improvement of environmental conditions, at the entrances it would fundamentally harm the townscape, changing the relationship with the road and the buildings flanking it. Leaving aside the technical issues involved, and the delay and uncertainty in securing the necessary consent, the cost of this option makes it unviable, and disproportionate to any benefits.

CONCLUSION

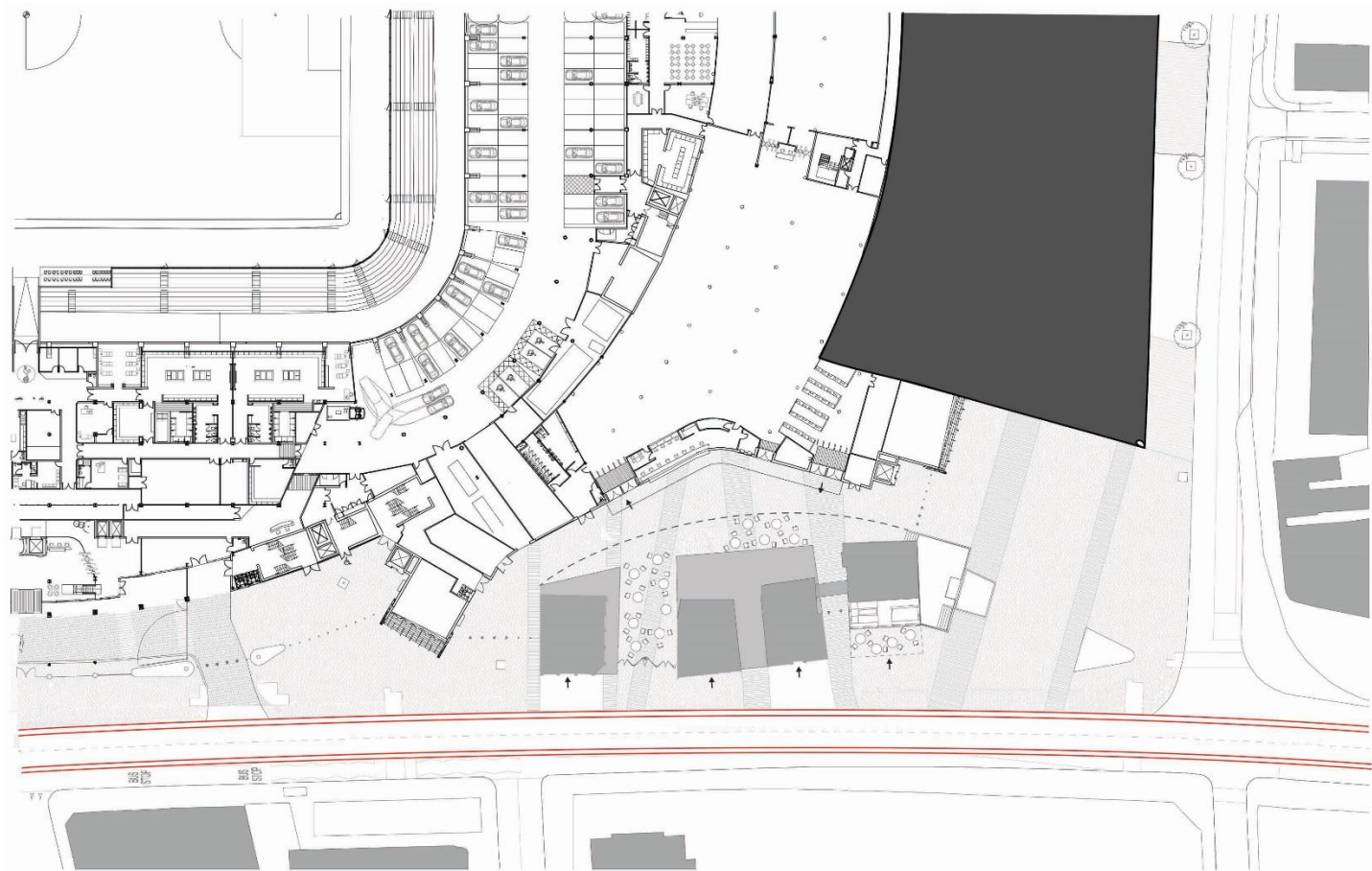
This option is considered undeliverable. In any event it is likely to have a significantly more harmful impact in heritage terms than the Populous Scheme.

10. KSS Consented Scheme and Flyover

Assessment

OPTION SUMMARY

- KSS scheme with vehicular traffic diverted over a flyover to increase pavement width at ground floor level



CROWD SAFETY

It is assumed that one vehicle lane in each direction would remain, and that this would carry local traffic only. The relative density of vehicles on the flyover and at grade is not yet known.

The alignment of the remaining lanes would provide need to provide additional walkway width to the eastern side of the High Road, sufficient to provide capacity for spectators to move without the need to move into the road. If the two remaining vehicle lanes are aligned with the central lanes now but wider, then the additional width would be less than that provided by the road, suggesting that the alignment would need to be towards the western pavement.

Barriers (and supporting stewarding) would still be required to demarcate the pedestrian-vehicle boundary.

HIGHWAYS AND TRANSPORT

It would be very difficult to locate the up/down ramps to the north and south without extensive demolition of existing buildings. The flyover section would be very expensive to build and would disrupt existing utility services. It would take many years of highly disruptive construction to implement even with the simplest central support option.

The local traffic and bus services would remain at grade in a 2 lane carriageway which would need to be almost as wide as the existing 4-lane cross-section – particularly given the overhead structure.

DELIVERABILITY

This would change the nature of the street and would significantly affect the setting of the Conservation area and all the Heritage Assets in it. A flyover would fundamentally harm the townscape, changing the relationship with the road and the buildings flanking it. In addition the up and down ramps may require substantial further demolition of HAs, presumably on the West side of the High Road.

Leaving aside the technical issues involved, and the delay and uncertainty in securing the necessary consent, the cost of this option makes it unviable, and disproportionate to any benefits.

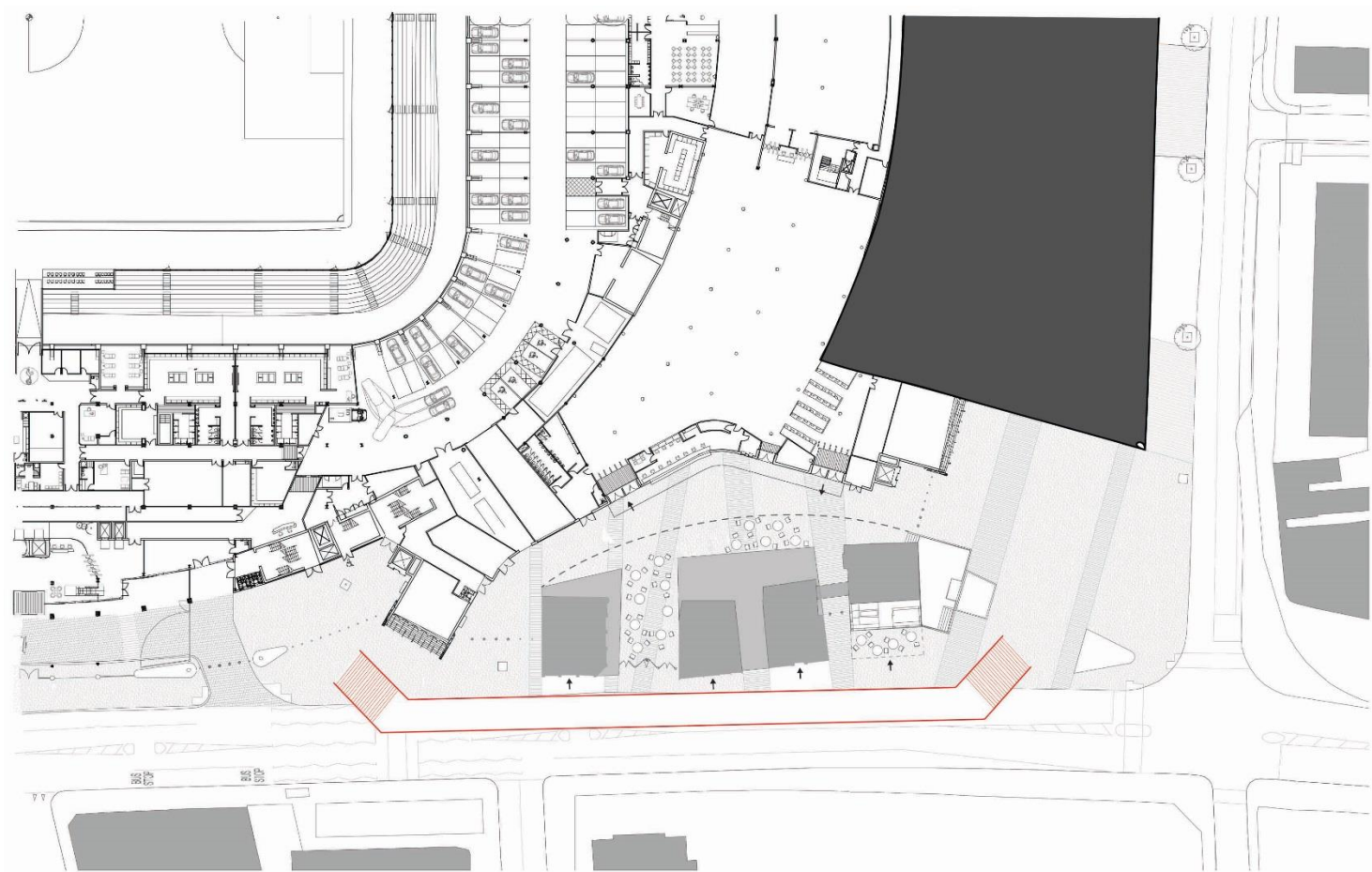
	CONCLUSION This option is considered undeliverable. In any event it is likely to have a significantly more harmful impact in heritage terms than the Populous Scheme.
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11. KSS Consented Scheme and Pedestrian Bridge / Walkways

Assessment

OPTION SUMMARY

- KSS scheme with new pedestrian walkway along eastern side of High Road that separates the pavement from vehicular traffic.



CROWD SAFETY

This is worse than option 1.

People will be unwilling to go up and back down again to use an overpass (more so than using the canyon).

This would only be effective if it catered for the desire line in three dimensions. People would continue to use the narrow footpath unless it was blocked off completely.

The stairs/ramps to the raised walkway would reduce footpath width for other movements and would likely more people to walk into the roadway

If the footpath was blocked there would be a risk of people walking in the road without any escape from oncoming vehicles.

HIGHWAYS AND TRANSPORT

Assuming that any structural supports for the pedestrian bridges do not impact on the roadway, and that the roadway would be unchanged in this option from option 1, the analysis is therefore the same as option 1.

DELIVERABILITY

This would fundamentally change the nature of the street. The raised walkway would cause substantial harm to the Conservation Area and numerous heritage assets. Leaving aside the technical issues involved, and the delay and uncertainty in securing the necessary consents, the cost of this option makes it unviable, and disproportionate to any benefits.

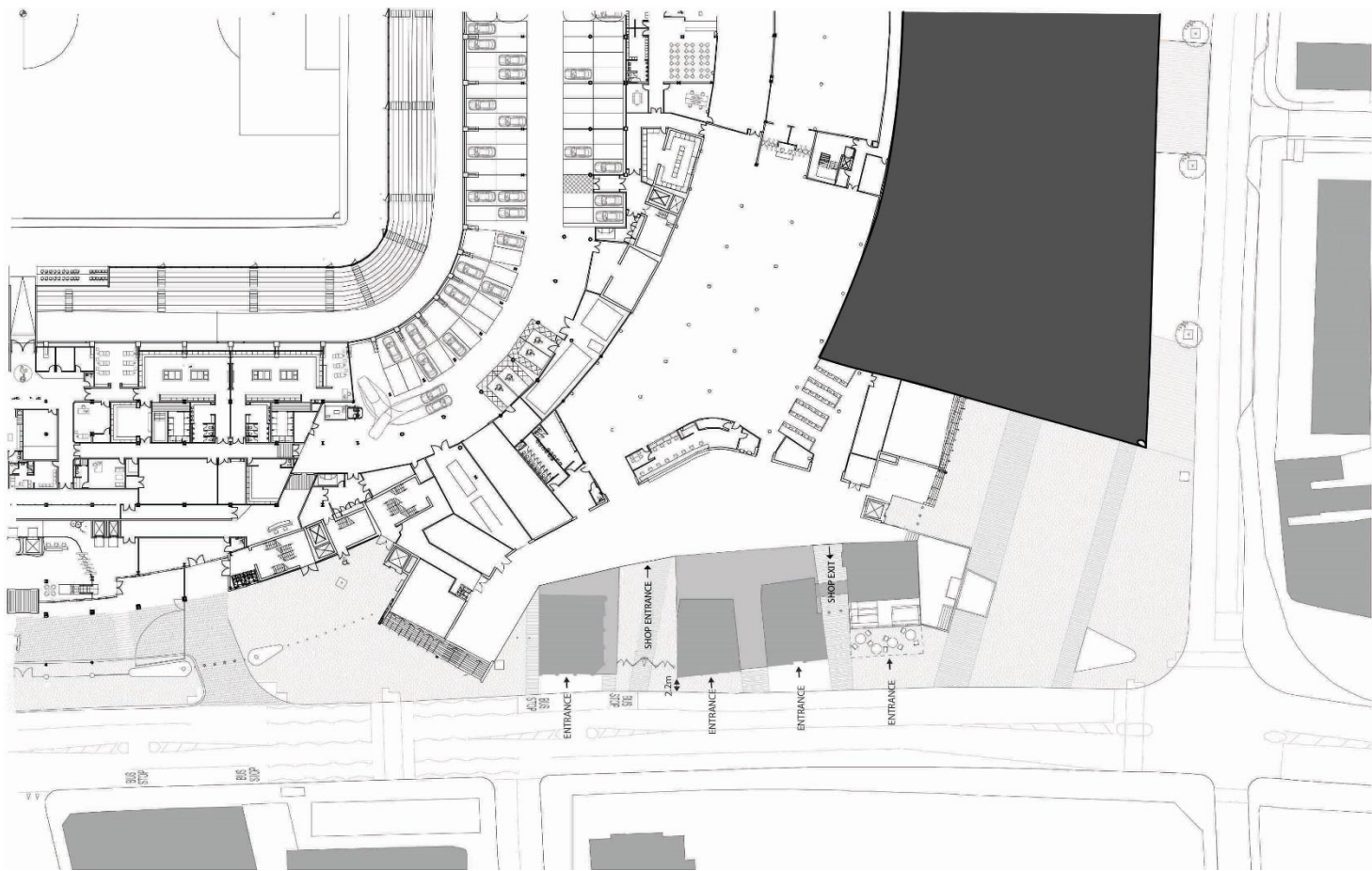
	CONCLUSION This does not meet the objective of reducing the crowd safety risk to ALARP. Furthermore it is not considered deliverable and would cause substantial harm to the Conservation Area and numerous heritage assets.
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12. Consented Scheme with Extended Podium

Assessment

OPTION SUMMARY

- A fundamental redesign of the Consented Scheme to close the canyon and bring the podium closer to the rear of the buildings



CROWD SAFETY

People will be unwilling to go up and back down again to use the podium to circumnavigate 744-750 High Road (more so than using the canyon). This would only be effective if it catered for the desire line in three dimensions.

The overwhelming majority of people would continue to use the narrow footpath unless it was blocked off completely (in which case the same issues identified in respect of Option 2 would arise).

Thus the risk will be similar to, if not worse than, option 1.

Entrances to 746 – 750 on the High Road would not be operationally viable. These would need to be closed on match day. As a result there would be no ground floor match day access

HIGHWAYS AND TRANSPORT

The southbound bus stop would need to be relocated further north perhaps to a point in front of the west side corporate spectator access or be removed without replacement.

DELIVERABILITY

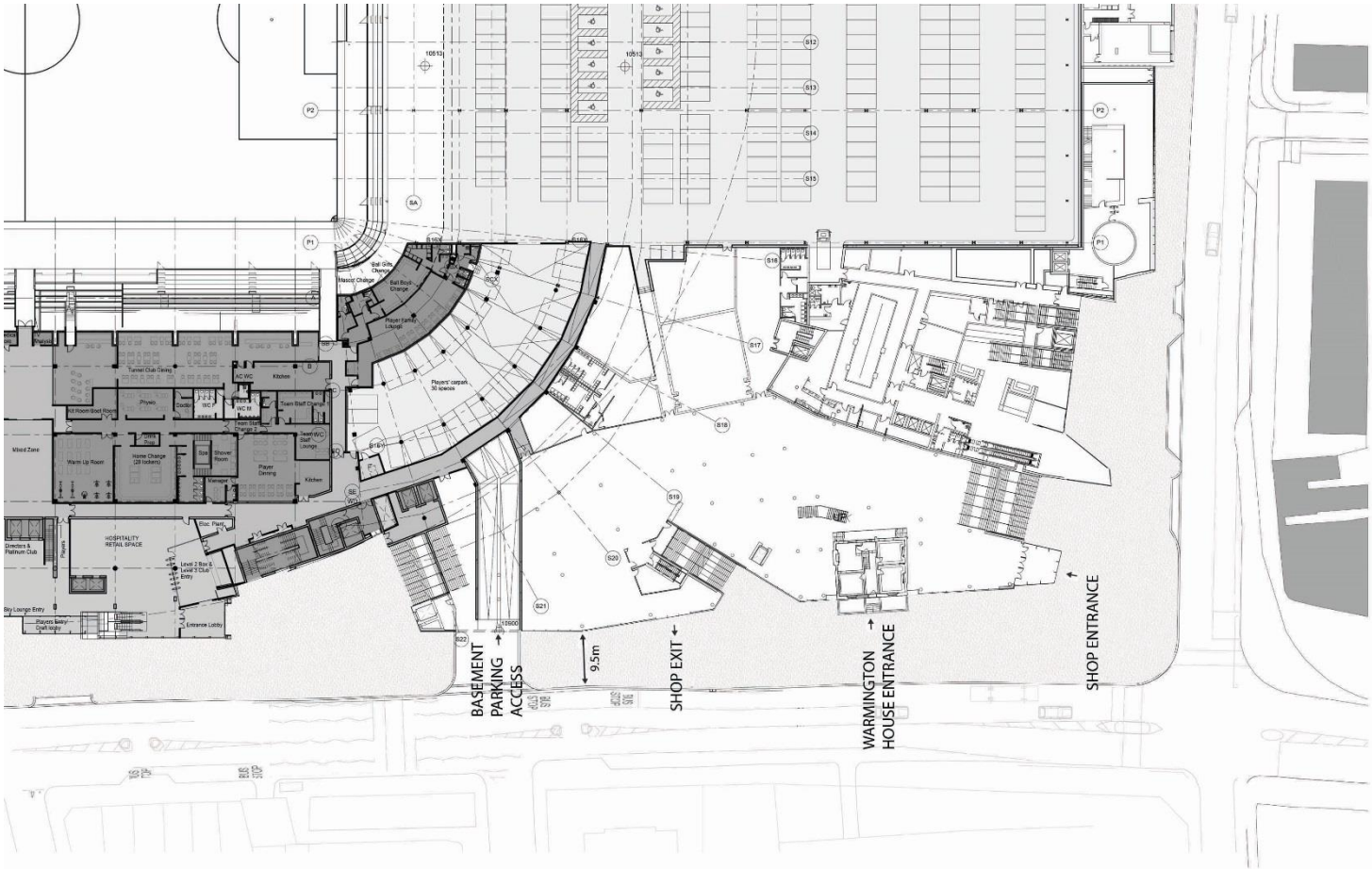
Without ground floor match day access to 746-750 high road any potential commercial viability would be compromised. As such, in addition to the significant crowd safety issues involved, this would not safeguard the future viability of the buildings.

CONCLUSION

This would not resolve the crowd safety risks associated with Option 1. It would not meet the objective of reducing the risk ALARP.

13. Populous Scheme

Assessment



CROWD SAFETY

This is demonstrably the safest option.

It provides space for crowd flow so that pedestrians can walk the way they want to without stepping off the footpath.

The walking area of the footpath will be protected by bollards. There is a space of 85cm between the kerb edge and this walking area. This acts as a buffer, so if people step outside of this walking area remain on the pavement.

The predicted flow of 185 people per minute through a width of 9.5m less 1.05m for bollards and edge effect gives a flow rate of 22 people/metre/minute LOS A. It provides a wide walkway allowing for manoeuvring away from the road.

Management measures, such as those discussed above, could be added as required, so this solution provides resilience.

HIGHWAYS AND TRANSPORT

The current Populous scheme is entirely consistent with the proposed stadium transport strategy. The proposed traffic management strategy makes the best use of the space available within the High Road to satisfy the possibly conflicting requirements of spectators, other pedestrians, bus operators and their passengers and stadium access by private vehicles, coaches/shuttle buses and the emergency services.

DELIVERABILITY

The Populous scheme is viable, subject to gap funding, and deliverable without delay, subject to planning.

The proposals would see the loss of three locally listed buildings, which is a ‘planning risk’. However, in the absence of any viable alternative which retains them, and taking into account the overall planning balance (see Planning Statement) there is a sound justification for their loss.

In townscape terms this would be a great improvement over the other options and, indeed, in bringing life and interest to the High Road itself this would mean the conservation area would be invigorated and enlivened, resulting in major benefits. This option also provides a long term viable use for Warmington House

	CONCLUSION This option is the safest option, is deliverable, subject to planning, and is entirely consistent with the overall transport strategy.
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9.0 Concluding Summary

9.1 We set out the results of the option appraisal below, based on the three criteria of crowd safety, traffic and highways impact, and viability/Deliverability.

Option Appraisal Summary	Crowd Safety	Highways	Deliverability
1. The Consented Scheme with no mitigation	✗	✓	✗
2. The Consented with barriers and stewarding	✗	✓	✗
3. The Consented Scheme with temporary closure of the Southbound bus lane	✗	✓	✗
4. The Consented Scheme with permanent closure of the Southbound bus lane	✗	✗	✗
5. Consented Scheme with Temporary Closure of Both Southbound Lanes	✗	✗	✗
6. The Consented Scheme with the temporary closure of both Southbound lanes and contraflow on the Northbound carriageway	✗	✗	✗
7. The Consented Scheme moving High Road westwards	✓	✗	✗
8. The Consented Scheme and shared surface on the High Road	✗	✗	✗
9. The Consented Scheme with a tunnel the High Road	✓	✗	✗
10. The Consented Scheme and Flyover above the High Road	✓	✗	✗
11. The Consented Scheme and pedestrian Bridge/walkways over the three buildings	✗	✗	✗
12. The Consented Scheme with an increased Podium	✗	✓	✗
13. The Populous Scheme	✓	✓	✓

- 9.2 This demonstrates that the only alternative options for retaining the locally listed buildings which are likely to address the requirements for crowd safety, and to reduce the risks to ALARP, are unacceptable in traffic and highways terms and incapable of being delivered. The cost, additional impacts and delays involved, and ultimately risk to the wider regeneration are disproportionate to any benefits they could deliver.
- 9.3 None of the less radical options offers an acceptable solution to the identified risks to crowd safety. In any event, 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, which in turn calls into question the viability of retaining the buildings in these scenarios.
- 9.4 The only option that is viable and deliverable, subject to planning, and meets the requirements for crowd safety and highways is the Populous Scheme, which necessitates the loss of these buildings. Taking the wider heritage and planning issues into account, including the significant heritage and wider regeneration benefits which are set out in the Planning Statement, there is clear justification for the loss of these buildings. Any localised heritage impact is more than offset by the wider heritage and other public benefits which the development delivers.