

NORTHUMBERLAND DEVELOPMENT PROJECT **HOTEL**

S73 APPLICATION

TOWNSCAPE AND VISUAL IMPACT ASSESSMENT ADDENDUM

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I.0 INTRODUCTION

- 1.1

Citydesigner ('the consultancy') has been commissioned by Tottenham Hotspur Property Company Limited ('the Applicant') to advise on and prepare a full Townscape and Visual Impact Assessment ('TVIA') report for the Northumberland Development Project Hotel Section 73 application to amend the hybrid consent granted on 15 April 2016 ('Operative Permission'). The application relates to design amendments to the approved hotel scheme at Plot 3.
- 1.2

The planning application for the Operative Permission was supported by an Environmental Statement ('ES'), dated September 2015 ('2015 ES'). The 2015 ES was prepared in accordance with the 2015 EIA Regulations. This S73 ES Addendum will be prepared under the 2017 EIA Regulations (as amended). This TVIA forms Chapter 12 of the ES Addendum and is a fully updated report taking into account the potential for substantive changes to the townscape and visual effects as a consequence of the proposed Amendments listed at 1.4 below. It is presented as an A3 standalone document in order to incorporate appropriately sized supporting visual material for the assessments.
- 1.3

This S73 application covers the entire extent of the Consented Scheme boundary ('the Site') which comprises land defined by the red line boundary shown on the adjacent map at Fig. 1.1.
- 1.4

The design revisions, however, are focused on changes to the hotel building on Plot 3 and adjacent public realm, which is shown in a dashed red line in Fig. 1.1 and are proposed to enhance the design of the building taking into account future occupier requirements and to meet new building regulations, including fire safety requirements. In summary, these changes ('Amendments') comprise:

•

Changes to the Plot 3 building form and layout;

•

An increase of approximately 17m in height taking the Plot 3 building to approximately 117m; and

•

An increase in the floorspace quantum of internal communal areas without any changes to the maximum permitted number of hotel bedrooms (180) or residential units (49) in the hotel.

1.5

No amendments are proposed to the remaining phases of the Consented Scheme (Plots 1, 2, 4, 5 and 6).

1.6

The completed parts (Plots 1 and 2) and the unbuilt parts of the Consented Scheme (Plots 3 to 6) as altered by the Amendments is referred to as the 'Development'

1.7

The description of development is as follows:
- "Application under Section 73 of the Town and Country Planning Act for variations to Condition A4 (Consented Drawings and Documents) and Condition A7 (Maximum Quantity/Density) of the hybrid planning permission HG/2015/3000 (as amended) for the proposed demolition and comprehensive redevelopment of the Northumberland Park Development Project (the amendments consist of revisions to the design, height and maximum floorspace at Plot 3 Hotel and other changes)."
- A detailed 2021 Ordnance Survey map of the Tottenham area in the London Borough of Haringey. The map shows a grid of streets, buildings, and green spaces. A red dashed line outlines the 'Site Boundary' which covers a large area including the Tottenham Hotspur Stadium and surrounding residential and commercial buildings. Within this boundary, a specific area labeled 'Plot 3' is highlighted with red hatching. The map also shows the boundaries of the London Boroughs of Enfield and Haringey, with a dashed line separating them. Various landmarks are labeled, including schools, parks, and the Tottenham Cemetery. A legend in the bottom left corner identifies the red dashed line as the 'Site Boundary' and the red hatched area as 'Plot 3'.
- Fig. 1.1: 2021 Ordnance Survey map showing the Site, outlined in red. The Plot 3 is hatched in red.
-  CITYDESIGNER

I

AUGUST 2023

I.0 INTRODUCTION (CONTD.)

Townscape and Visual Impact Assessment

1.8 The consultancy has assisted the Applicant's architects, F3 Architects ('the architects') by providing assessment and feedback on the design of the Development and its potential impacts and likely effects on townscape and visual receptors. The effects on heritage assets are dealt with separately by Cogent Heritage in the Heritage Statement Addendum and should be read in conjunction with this TVIA, the topics being interrelated.

1.9 The assessments in this TVIA consider: the effects on the townscape character of the Site and surrounding context, and a selection of townscape views potentially affected by the Development. The assessment takes into account the design quality of the Development, the requirements of current EIA regulations and legislation, and planning policy and guidance in relation to townscape and views as relevant. The relevant documents are listed in section 2 of this report. The consultancy has also reviewed the previous TVIA submitted with the 2015 ES and taken into account aspects that remain relevant in relation to this S73 application; however with the substantial changes in the baseline condition, updates to the EIA regulations and national policy and guidance, this TVIA chapter has been prepared as a fully updated report assessing recently defined townscape character areas and new viewpoint positions where necessary, to illustrate the full townscape and visual effects of the Amendments to the Consented Scheme.

1.10 The assessments in this TVIA report have been undertaken in accordance with the consultancy's methodology described in section 2, based on the 2017 EIA regulations and current national and local policy documents, and follows the below structure:

- section 3 provides a description of the Site, the surrounding context and the emerging context including other cumulative developments;
- section 4 describes the Development, focusing on the design revisions to the NDP Hotel ('Hotel') and its design quality;
- section 5 sets out the demolition and construction effects;
- section 6 assesses the effects of the completed and operational Development on townscape character areas;
- section 7 presents Accurate Visual Representations (AVRs) from 29 viewpoints (with night-time versions of 2 views) of the completed and operational Development in a selection of long, medium and close viewpoint positions and assesses the likely visual effects of the Development in comparison with the existing condition, with a focus on the design revisions to the Hotel; and,
- section 8 sets out the overall conclusions of the townscape and visual assessment and a summary table of the residual effects.

1.11 This document also includes the following appendices:

- Appendix 1: 11 non-verified model views of the Development from additional viewpoints generated using the VU.CITY software. These are where the early testing of views showed that the scheme has limited visibility, where the view is not from a sensitive townscape context or where the visual effects have been adequately represented in the set of AVRs.
- Appendix 2: Alternative Massing for the adjacent Extreme Sports Building (Plot 4) – Sensitivity test in response to LB Haringey's request. This appendix presents one townscape view to illustrate the visual effects of alternative massing options for Plot 4. It is not proposed to amend the design of this building as part of this application on the basis that this is likely to be further revised in due course as discussions with occupiers progress. Please refer to section 5 of the architects' DAS for more details.
- Appendix 3: ZTV diagrams generated in VU.CITY by the consultancy, illustrating the zone of theoretical visibility of the Development.
- Appendix 4: Selection of Comparative Views with Extant Hotel Scheme
- Appendix 5: Miller Hare's Method Statement for generating AVRs

1.12 Other documents that are related to this TVIA are: the overall Volume I of the ES Addendum (coordinated by Quod), the Design and Access Statement (DAS) and accompanying planning drawings produced by F3 Architects, the Heritage Statement Addendum prepared by Cogent Heritage, and the Planning Statement prepared by Quod.

2.0 METHODOLOGY OF ASSESSMENT

INTRODUCTION		
2.1	This section sets out the methodology developed by Citydesigner to assess the likely effects of the Development, including the proposed Amendments to the Hotel at Plot 3, on the townscape and visual amenity. It draws upon best practice guidance set out in the 'Guidelines for Landscape and Visual Impact Assessment' (GLVIA, Third Edition, 2013), as well as current Environmental Impact Assessment (EIA) regulations and national and regional planning guidance. The purpose of the Townscape and Visual Impact Assessment (TVIA) is to determine which effects on the townscape and visual amenity are likely to be significant. The effects on heritage assets are dealt with separately by Cogent Heritage, in the Heritage Statement that accompanies the application, and should be read in conjunction with this TVIA, the topics being interrelated. This methodology covers the following topics: • Policy and Guidance • EIA scoping • Defining the Study Area • Design quality and its relevance to assessments • Distinctions between townscape and visual assessments • Establishing the value and susceptibility of receptors • Establishing the baseline conditions • Townscape Assessment - Baseline • Visual Assessment – Baseline • Construction effects • Assessment of Townscape and Visual Effects for Completed Development • Mitigation and enhancement through design • Direct and indirect effects • Cumulative effects • Assumptions and limitations • Professional standpoint of the author • Photography in AVR and assessment • Using an original copy of this document	
2.2	Two interrelated impact assessment methodologies have been used in this report, relating to: i. Townscape Effects: assessment of the effects of new development on elements of townscape character referred to as townscape receptors; and ii. Visual Effects: assessment of the effects of new development on visual amenity, where the receptors are people experiencing views. These assessments also inform the assessment of effects on built heritage and the townscape.	<u>Regional level</u> • Greater London Authority (GLA), The London Plan, March 2021; • London View Management Framework SPG March 2012. <u>Local level</u> • London Borough of Haringey (LB Haringey), Urban Character Study, 2015; • GLA/ LB Haringey, Tottenham Physical Development Framework, 2014; • LB Haringey, Tottenham Area Action Plan, 2017; • LB Haringey, Development Management DPD, 2017; • LB Haringey, Local Plan Strategic Policies, 2013 (with alterations adopted July 2017); • LB Haringey, Site Allocations DPD, 2017; • LB Haringey, Tottenham Strategic Regeneration Framework, 2014; • London Borough of Enfield (LBE), Characterisation Study 2011; and • LB Haringey, Tottenham High Road Historic Corridor, Conservation Area Character Appraisal, 2009.
2.3	There are important overlaps between townscape and visual effects, particularly in a dense urban environment, and it is sensible, therefore, to assess them together in a single document. Townscape and visual assessments are, however, recognised as separate topics within the EIA, with separate policy requirements. For these reasons, they are separated into two distinct sections in this TVIA.	
POLICY AND GUIDANCE		
2.4	This assessment methodology takes into account relevant legislation, national, regional and local planning policy and guidance, in particular those relating to townscape, design quality, urban design and views. These are listed below. Assessment of the Development against relevant policy is included at the end of each assessment section. <u>National level</u> • Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment (GLVIA) Third Edition, 2013; • Landscape Institute, Visual Representation of Development Proposals Technical guidance Note 06/19, 2019; • Town and Country Planning (Environmental Impact Assessment) Regulations, 2017 as amended 2018; • Ministry of Housing, Communities & Local Government (MHCLG), National Planning Policy Framework (NPPF), 2021; • MHCLG, Planning Practice Guidance (NPPG), On-line Resource, 2014, regularly updated; • MHCLG, National Design Guide, 2021; and • Historic England (HE) Advice Note 4: Tall Buildings Second Edition, 2022.	<u>Regional level</u> • Greater London Authority (GLA), The London Plan, March 2021; • London View Management Framework SPG March 2012. <u>Local level</u> • London Borough of Haringey (LB Haringey), Urban Character Study, 2015; • GLA/ LB Haringey, Tottenham Physical Development Framework, 2014; • LB Haringey, Tottenham Area Action Plan, 2017; • LB Haringey, Development Management DPD, 2017; • LB Haringey, Local Plan Strategic Policies, 2013 (with alterations adopted July 2017); • LB Haringey, Site Allocations DPD, 2017; • LB Haringey, Tottenham Strategic Regeneration Framework, 2014; • London Borough of Enfield (LBE), Characterisation Study 2011; and • LB Haringey, Tottenham High Road Historic Corridor, Conservation Area Character Appraisal, 2009.
EIA SCOPING		
2.5	Regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 states that an applicant may ask the relevant planning authority to state in writing their opinion as to the scope and level of detail of the information to be provided in the environmental statement (a 'scoping opinion').	
2.6	In this case, a scoping exercise was undertaken to identify the potentially significant environmental issues relating to the Site and the Development, thus ensuring they are subject to an appropriate level of assessment, and therefore a focus for the EIA. The Informal EIA Scoping Note (available at ES Volume III, Technical Appendix 2.1), summarising the findings of the scoping exercise and setting out the proposed scope of the EIA, was submitted to the LB Haringey on 6th June 2023. LB Haringey responded informally to the Informal EIA Scoping Note and to the separately submitted Preliminary Viewpoint Study at the pre-application meeting with LB Haringey's Design and Heritage officers on 13th June. The set of views for townscape and	

2.0 METHODOLOGY OF ASSESSMENT (CONTD.)

visual assessment and their form of presentation were informally agreed. In response to a request to consider potential views from the new Station Square,			
DEFINING THE STUDY AREA			
2.7	The study area for the townscape assessment includes the Site and its wider context at 750m radius from its centre. While it is common for ES chapters to identify all receptors primarily on the basis of distance this approach is not considered to be appropriate for the visual assessment, where the sensitivities of visual receptors are also reliant on other factors such as the importance of statutory designations, openness of views, height of buildings and vegetation in the foreground etc. The study area for the visual assessments in this TVIA is, therefore, decided based on the professional judgement of the assessor and informed by site visits, desktop research of the immediate and wider context, land contours, map analysis and early extrapolations from computer model view studies (such as VU.CITY and Zone of Theoretical Visibility (ZTV) maps where appropriate) in order to identify visual receptors that may potentially be affected by the Development, depending on their sensitivity and their location in relation to the Site.	2.11	The process of consultation and extensive engagement with planning, design and heritage officers at LB Haringey, LB Haringey’s Quality Review Panel (QRP) and other consultees also enabled the final proposal to be optimised, in terms of its design quality and associated townscape and visual effects, prior to the final assessments being undertaken. A comparison of the Development following these optimisations against the alternative of implementing the Consented Scheme is provided in Chapter 4: Description of Development of ES Volume I.
		DISTINCTIONS BETWEEN TOWNSCAPE AND VISUAL ASSESSMENTS	
		2.12	The methodologies for assessing townscape and visual effects vary in response to their different characteristics and the different policy requirements affecting them. The methodologies recognise, however, that in reality the townscape is generally experienced by people in a visual way and also spatially, in time, movement and memory, i.e., in a kinetic manner and in views. There are therefore distinctions but also overlaps in the two assessments. Paragraphs 2.13 to 2.14 below describe the distinctions between the assessments, and the specific methodologies are explained fully in the subsequent sections in this section.
2.8	The process of selection of townscape and visual receptors is set out in detail below, within the relevant sub-sections. The selected receptors are mapped out and agreed with the local planning authority as part of the pre-application process. The maps at the start of each section are annotated to indicate the selected receptors that have been assessed.	2.13	<u>Townscape assessment</u> considers the likely townscape effects of the Development, i.e., identifies how and to what degree it would affect the elements that make up the townscape, its aesthetic and perceptual aspects, and its distinctive character. These elements may include urban grain, building heights, scale, permeability, legibility, sense of place, or other architectural or urban design characteristics. These townscape elements are referred to as ‘townscape receptors’ in this TVIA. Where applicable, they are assessed in relation to character areas identified within the townscape.
DESIGN QUALITY AND ITS RELEVANCE TO ASSESSMENTS			
2.9	The addition of a visible high-quality design can generally be expected to be beneficial to the townscape. When it is related to existing, valued and very often historic contexts, however, even a well-designed building has the potential to unacceptably dominate, be incongruent or cause a degree of harm. The appropriateness and quality of the design are, therefore, key considerations in the assessment of the effects of the Development on townscape character and views, particularly when they include heritage assets. This approach is supported by national and local policies and heritage guidance.	2.14	<u>Visual assessment</u> considers the changes in visual amenity resulting from the Development as seen from a specific viewpoint. It assesses the effect of changes in the view on the people experiencing views who are referred to as ‘visual receptors’ in this TVIA. The Accurate Visual Representations (AVRs) included in section 7 of this report are used principally in the assessment of visual effects and the visual amenity of people, but they are also of value in assessing the effects of the Development on the townscape, considered in section 6. They are also useful in informing the assessment of effects on heritage assets; this is considered separately in the Heritage Statement prepared by Cogent Heritage. For this reason, when an assessment of the effect of the Development on the townscape made in section 6 can be illustrated by one or more of the AVRs in section 7, a cross-reference is made for the benefit of the reader.
		ESTABLISHING THE VALUE AND SUSCEPTIBILITY OF RECEPTORS	
2.10	The consultancy has worked with the architects and design team to fully understand the Development and the proposed Amendments to the proposed Hotel at Plot 3 and to provide feedback on design throughout its development. Computer models were used during the design process to illustrate how different iterations of the design would affect views. This information was used to make early assessments on the townscape and visual effects and thereby inform modifications to the design. Mitigation is therefore embedded through the design process (see section ‘Mitigation and enhancement through design’ at paras 2.60 to 2.62), and the intention is to achieve a high quality of design in order to maximise the beneficial effects of the Development on potentially affected receptors.	2.15	The GLVIA requires judgements to be made about the value of the receptor and the susceptibility of the receptor to the change resulting from the proposal. The specific attributes that are taken into account to ascribe

2.0 METHODOLOGY OF ASSESSMENT (CONTD.)

In sections 6 and 7 the effects assessed are when the Development is operational, i.e., when the Development will be finished and in use. The duration of these effects is considered to be permanent.		through the area, that are of importance;		are mostly appreciated. Exceptions are high-level public and semi-public viewing spaces, particularly if historic, such as St Paul’s Golden Gallery or the Monument in the City of London. The most appropriate of these positions are chosen for formal assessment in consultation with the local planning authority.	
Future Baseline (without Development)		the overall character or quality/condition of a particular street or series of spaces; and			
2.20	If the Development is not constructed within the estimated construction period set out in section 5 of this report, the baseline will remain the same, unless the cumulative schemes identified in this report and/or the planning permissions on the Site are constructed. In this case, they will constitute the only anticipated changes to the baseline.	notable aesthetic, perceptual or experiential qualities.		2.29	The consultancy has used a VU.CITY Zone of Theoretical Visibility (ZTV) analysis in response to a request from the LB Haringey. Areas of visibility determined by a ZTV analysis are called ‘theoretical’ because there may be visual obstructions in the townscape or landscape, such as buildings and trees, which may be not included in the data used for analysis but, in reality, would screen the visibility of the Development. In the case of the Development, the Site is in close proximity to open spaces with a large number of mature trees, which are not accounted for in a VU.CITY ZTV model. It was therefore considered that a site-based selection of viewpoints was more appropriate to consider the visual effects of the proposals in a realistic way. The potential limitations of using a ZTV analysis are also noted in the GLVIA (3rd edition, 2013) and HE’s GPA Note 3: The Setting of Heritage Assets’ (second edition, 2017). While it is acknowledged that technological advancements have recently improved the accuracy of ZTV analysis, the true accuracy of visual impact can only be proven, using fully verified AVRs from the selected view positions. These are included in section 7 of this report. ZTV diagrams can be found in Appendix 3 and illustrate the theoretical visibility of the Development, covering an area of up to 2km in distance. The line-of-sight calculations have been used from the centre of the model. The ZTV diagrams reflect different height bands for the hotel at Plot 3, with each colour identifying how much of the proposal can be seen from any given location.
TOWNSCAPE ASSESSMENT - BASELINE		Establishing the sensitivity of townscape receptors			
2.21	The purpose of the townscape assessment, undertaken in section 6 of this TVIA, is to establish whether the effects of the Development on the townscape as an environmental resource are significant. The methodology is in accordance with the GLVIA, 2013, and considers how the Development will affect the key components of the townscape, its perceptual and aesthetic qualities and its distinctive character.	2.25	Townscape character areas are not a statutory designation but arise out of historical patterns of development. In each case, their potential sensitivity has been considered by combining judgements about the value attached to their townscape and the type of change or development proposed. The value of the townscape receptor could be identified by a range of criteria such as condition, scenic quality, rarity, representativeness/recreational value, perceptual qualities and associations. In this TVIA, the sensitivity of townscape receptors is described as ‘high’, ‘medium’ or ‘low’.		
		VISUAL ASSESSMENT - BASELINE			
2.22	To undertake the assessment, the TVIA identifies areas of distinct townscape character in proximity to the Site, which have the potential to be significantly affected by the Development. Townscape character areas and their key characteristics are identified by the consultancy through field survey, with reference to any character areas that have already been identified and illustrated by other bodies producing urban character appraisals. Where conservation areas are designated in proximity to the Site, their appraisals are also relevant to understanding the key characteristics of the townscape.	2.26	The assessments of effects on visual amenity are focused on the likely effects of changes to townscape views on visual receptors, i.e., people experiencing townscape views and effects on visual amenity. The methodology is in accordance with the GLVIA (2013), the Visual Representation of Development Proposals Technical Guidance Note 06/19 (2019), and relevant national, regional and local guidance on view assessments.		
2.23	These townscape character areas are mapped, and key characteristics described and illustrated using photography where appropriate.	2.27	Section 7, which considers representative 31 Accurate Visual Representation (AVR) images of the Development from 29 viewpoints (with two night-time variations), enables assessment of the effects on people and their visual amenity. The set of selected views have been agreed with LB Haringey, as described in paragraph 2.30. These assessments may refer to heritage assets or their settings where relevant. An additional 11 non-verified views, also agreed with LB Haringey, have been tested using the VU.CITY software in order to inform the visual assessment process and are included in Appendix 1.	2.30	The viewpoints, which were agreed with LB Haringey, represent a spread of close, medium and long distance, where particular topographical conditions allow longer views towards the Site. These include views from all directions, which illustrate the urban relationships likely to arise between the Development and its surroundings, including heritage assets and other important elements of townscape. Where appropriate, seasonal change and night-time effects have also been taken into account. 19 relevant view positions have been selected from previous townscape work for the NDP Consented Scheme, and one view from the consented Goods Yard and The Depot scheme. 20 additional view positions have been chosen by the consultancy to fully illustrate the visual effects of the revised hotel scheme. Of this combined set, 31 views have been selected to be produced as Accurate Visual Representations (AVRs) from 29 viewpoints (including two night-time variations) and have been assessed in section 7. 11 views have been included as additional information, in the form of non-verified VU.CITY model views (in Appendix 1) where the scheme has limited visibility or the view is not from a sensitive townscape context. The set of verified AVRs and their form of representation were agreed by the LB Haringey in two meetings that took place on the 1 st and 13 th of June 2023.
Identification of townscape receptors		Identifying viewpoint positions for visual receptors			
2.24	The key characteristics of the townscape within character areas that are likely to be affected by the Development are identified as townscape receptors. It is the effects on these townscape receptors that are assessed in sections 5 and 6. Examples of townscape receptors include:	2.28	Site visits, supported by map analysis and the use of computer models, allow for the identification of publicly accessible viewpoint positions from which the Development would potentially be visible, as presented in section 7. Though digital means are used in the view studies, the choice of views is only made once the site and the area around it has been visited. Considerations for selected views include, amongst other factors: the likely maximum visibility of the proposal; tree cover; traffic sign positions; hierarchy of viewpoint (e.g., public or semi-public access); the significance of the place; and ability for surveyors and photographers to safely place equipment without obstructing the public realm. Views are generally restricted to publicly accessible spaces at street level (i.e., 1.6m above ground), as this is from where townscapes	2.31	Each viewpoint and view from it aims to represent the ‘maximum exposure’ of the Development as well as its ‘maximum conjunction’ with sensitive elements in the built environment.
- a particular scale or height of development that is characteristic and of value; - particular spatial layouts, patterns of development or urban grain; - particular relationships between open or green spaces, water bodies or topography; - particular features, such as skylines, connectivity or permeability					

2.0 METHODOLOGY OF ASSESSMENT (CONTD.)

Establishing the sensitivity of views and visual receptors (people)		agreed viewpoints. The AVRs were produced by incorporating a computer model of the Development accurately into surveyed photographs of the local area, in accordance with Miller Hare’s methodology (see Appendix 4).		combination of either (i) high receptor sensitivity and a low magnitude of change; or (ii) medium receptor sensitivity and a medium magnitude of change; or (iii) low receptor sensitivity and a high magnitude of change, owing to the Development.	
2.32	For the visual assessments, the sensitivity of visual receptors has been considered by combining judgements of the value attached to a particular view and the receptor’s susceptibility to change in the view. It is acknowledged that people may have different responses to the appearance of the Development, depending on their circumstances and personal aesthetic preferences. Local residents are likely to have a different response than, for example, those working in the area or passing through as visitors. The viewpoints were chosen to address this factor by including a spread of viewpoints that different viewers would experience across the study area. Some of the viewpoints are from publicly accessible heritage assets and important thoroughfares, while some are on minor streets where local residents are more likely to be the principal receptors.			2.46	For the purposes of this TVIA, moderate effects (whether adverse, neutral or balanced, or beneficial) are considered significant and therefore material in planning terms.
		Establishing the magnitude of change for Townscape and Visual Assessments			
		2.38	In EIA terms, the magnitude of change for both townscape and visual impact assessment is generally considered to be a combination of: (i) the size and scale of the potential impact; and (ii) the geographical extent of the area affected. These are quantitative factors which can generally be measured with some certainty. The assessment takes all these factors into account.		Minor effects
		2.39	The magnitude of change in relation to visual receptors, in particular, is considered through assessing wireline (outline) or rendered (photorealistic) AVRs which indicate the Development’s physical scale and visibility. The magnitude of change is a quantitative, objective measure of the impact of the Development as shown in the AVRs.	2.47	Minor townscape and visual effects are generally those produced by a combination of either, (i) medium receptor sensitivity and a low magnitude of change; or (ii) low receptor sensitivity and a medium magnitude of change, owing to the Development.
2.33	The assessment of the effects of the Development on visual amenity is made with full awareness of these different standpoints and particular categories of visual receptors (i.e., people) are referred to where it is appropriate.			2.48	For the purposes of this TVIA, minor effects (whether adverse, neutral or balanced, or beneficial) are not considered significant.
2.34	When heritage assets or their settings are visible in views, the approach taken to identifying sensitivity in views and to considering the effects of new development on heritage receptors is supported by HE’s GPA Note 3: The Setting of Heritage Assets’ (Second Edition, 2017).	2.40	In this TVIA, the magnitude of change (whether for townscape or visual receptors) is described as ‘high’, ‘medium’, ‘low’ or ‘nil’.		Negligible effects
		Establishing the significance of effects for Townscape and Visual Assessments		2.49	Negligible townscape or visual effects are generally those produced by a combination of low receptor sensitivity and a low magnitude of change, owing to the Development. In some cases, the combination of low sensitivity of receptor and low magnitude of change are such that the effects are so minor as to be negligible. Frequently, when the effects are negligible, it is not normally possible to identify whether they are beneficial, neutral or balanced, or adverse, though this is not always the case. The rating decision is based on what is visible and what is perceived.
2.35	In this TVIA, the sensitivity of visual receptors is described as ‘high’, ‘medium’ or ‘low’.	2.41	The significance of townscape and visual effects is established by combining judgements about the sensitivity of the receptors affected with judgements about the magnitude of the change, in order to identify the potential effect. Thereafter, the mitigation and/or enhancement achieved through design is considered, giving rise to a residual, or overall effect.		No change
CONSTRUCTION EFFECTS				2.50	‘No change’ in terms of townscape or visual effects refers to those cases where it is not possible to identify any effects on receptors owing to the Development. This may occur when receptors are located at considerable distance from the Development, such that it does not have any effect on elements of townscape character or is completely invisible owing to obscuration by surrounding buildings or vegetation.
2.36	Construction effects are considered temporary and short-term. They would typically be adverse in terms of townscape and visual receptors, as the Development is erected behind scaffolding and with the visible use of heavy machinery. Though temporary, construction effects could also be potentially significant, especially for people (visual receptors) who live or work in the area of the Site. The assessments of the temporary effects on townscape and visual receptors likely to arise during construction are discussed in section 5. They are extrapolated from the available quantitative and qualitative information with regard to changes in the townscape and views as a result of the Development. The level of visibility of the completed Development as shown in the AVRs helps to inform the assessment of likely effects during construction works.	2.42	The significance of townscape and visual effects is rated on a scale of ‘major’, ‘moderate’, ‘minor’, ‘negligible’ or ‘no change’, as follows: Major effects		
		2.43	Major townscape and visual effects are those produced by a combination of either (i) high receptor sensitivity and a high magnitude of change; or (ii) medium receptor sensitivity and high magnitude of change; or (iii) high receptor sensitivity and a medium magnitude of change, owing to the Development.	2.51	The table at figure 2.1 summarises how judgements about receptor sensitivity and magnitude of change are combined to establish the significance of potential townscape and visual effects.
ASSESSMENT OF TOWNSCAPE AND VISUAL EFFECTS FOR COMPLETED DEVELOPMENT		2.44	For the purposes of this TVIA, major effects (whether adverse, neutral or balanced, or beneficial) are considered significant and are therefore material in planning terms. Moderate effects	2.52	In exceptional cases the assessor may make judgements which are not in accordance with the table at figure 2.1. For example, the assessor may consider that effects are major, even when the sensitivity of the receptor is low. Such cases are usually owing to the magnitude of the change being exceptionally high in the context within which it is experienced. Vice-versa, low magnitudes of change can also give rise to major (and therefore significant) effects when townscape or visual receptors are exceptionally
2.37	The interactions between the Development and the identified townscape and visual receptors are assessed by combining judgements about the sensitivity of the townscape and visual receptors and the magnitude of change they would experience as a result of the Development. In the case of visual receptors, AVRs of the Development were constructed from the	2.45	Moderate townscape and visual effects are generally those produced by a		

2.0 METHODOLOGY OF ASSESSMENT (CONTD.)

		SENSITIVITY OF THE RECEPTOR		
		High	Medium	Low
MAGNITUDE OF CHANGE	High	Major	Major	Moderate
	Medium	Major	Moderate	Minor
	Low	Moderate	Minor	Negligible
	Nil	No-Change	No-Change	No-Change

Fig. 2.1: Significance criteria, combining judgements about sensitivity of the receptor and magnitude of change to determine the significance of the potential effect. Effects in yellow are considered significant and therefore material in planning terms.

sensitive. In other cases, when the sensitivity of the receptor is low, a low magnitude of change can give rise to a minor effect owing to the position of the development in relationship to its townscape, for example when the development forms a focus to a view. Where such exceptional professional judgements are made, they are explained in the assessment text.

Establishing the qualitative nature of effects for Townscape and Visual Assessments

2.53 Once the significance of the potential effect has been established, the assessor must consider to what extent mitigation and enhancement (as detailed later in this section) has been achieved through design and whether the qualitative nature of the overall, or residual, effect is 'beneficial', 'neutral or balanced' or 'adverse'.

Beneficial effects

2.54 Beneficial townscape and visual effects occur when the Development would give rise to an improvement in townscape or view quality and the visual amenity of the viewer owing to:

- enhancement of the townscape quality;

- enhancement or reinforcement of the key characteristics of the townscape character areas; and/or
- the introduction of features or elements of high design quality, which enhance the existing character and visual enjoyment.

Neutral or balanced effects

2.55 Neutral or balanced townscape and visual effects can occur when:

- there is neither a beneficial nor adverse effect, i.e., it is 'neutral';
- beneficial and adverse effects are finely 'balanced', i.e., the effect is a 'net equation' judgement that takes into account both beneficial and adverse impacts; or
- the form and silhouette of the building are clearly seen but the detailed design aspects of the Development are not discernible (for example, when views are too distant for the architectural detail of facades to be seen); the qualitative contribution is therefore limited, leading to a 'neutral' effect.

2.56 A neutral or balanced effect can occur for both significant and non-significant range of residual effects; in each case, the reasoning will be explained in detail in the narrative of the assessment text.

Adverse effects

2.57 Adverse townscape and visual effects occur when the Development would give rise to deterioration in townscape or view quality and the visual amenity of the viewer owing to:

- harm to the townscape quality;
- harm to the key characteristics of townscape character areas, if applicable; and/or
- the introduction of features or elements of poor design quality, which detract from the existing character and harm visual enjoyment.

Overall significance ratings for Townscape and Visual Assessment

2.58 The townscape and visual effects of the Development are given a rating which refers to both, the significance of the potential effect and whether it is beneficial, neutral or balanced, or adverse, after mitigation and/or enhancement through design have been taken into account. These effects are referred to as 'overall' or 'residual' effects. The overall significance ratings for townscape and visual effects, therefore, can be:

- major and beneficial;
- moderate and beneficial;
- minor and beneficial;
- major and neutral/balanced;
- moderate and neutral/balanced;
- minor and neutral/balanced;
- major and adverse;
- moderate and adverse;
- minor and adverse;
- negligible; or
- no change.

2.59 The overall significance ratings should not be converted into statistics, because it is crucial that the qualitative written assessment of each effect is taken into account by decision makers. Judgements about the significance of effects are made as transparently as possible so the reasoning can be traced and examined by others. It is not possible to make these qualitative or perceptual measurements wholly scientifically; rather they depend on professional judgement, as the GLVIA makes clear. The commentary used to express the judgement uses words and phrases to qualify the nature of change and effect on human perception. The intention has been to use these qualifiers consistently; the reader is encouraged to read and understand them in the context of the wider narrative about each effect.

MITIGATION AND ENHANCEMENT THROUGH DESIGN

2.60 The process of design development allows potentially adverse effects on the townscape or visual amenity to be reduced as far as possible or eliminated. In proposing a substantial object in the townscape, it is incumbent on the design team to develop a design which will be a delight to see from all directions. This is part of the normal iterative design process and the skill of the designer ensures that mitigation need not be 'added on' later. Hence, for the purpose of this TVIA, the mitigation is considered to be embedded in the design.

2.61 Many urban development projects provide an opportunity to enhance the existing townscape through sensitive and high-quality design. This is because the existing townscape is itself a layering of built form which has developed over time, providing an engaging and often unique character that, despite its existing qualities, can often be added to in a beneficial way. As set out in paragraphs 2.9 to 2.11 the degree of enhancement achieved through high quality design is an important factor in determining the overall residual effect of the Development. A description of the design of the Development and its particular qualities can be found in section 4 of this document.

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2.62 Given that the Development has been designed with the purpose of enhancing its urban environment and mitigating any potential effects on the townscape, the only ‘supplementary mitigation’ that will be required is related to mitigating the temporary visual effects during construction. This is set out in paragraph 5.15 in section 5 of the report.

DIRECT AND INDIRECT EFFECTS

2.63 As per the GLVIA3, direct townscape and visual effects are effects that result directly from the Development. Indirect townscape and visual effects are those that result indirectly from the Development as a consequence of the direct effects, often occurring away from the Site, or as a result of a sequence of interrelationships or a complex pathway.

2.64 Construction effects and the effects of the completed and operational Development on townscape character areas that include the Site are both direct effects as elements of the townscape, such as the architecture, permeability and legibility etc. would be directly affected, whereas the character areas that are separate from the Site would only be indirectly affected.

2.65 All the visual effects where the Development is visible are considered to be direct effects. The same applies for construction visual effects.

CUMULATIVE EFFECTS

2.66 In addition to an assessment of the townscape and visual effects of the completed Development in isolation, this TVIA also considers the effects of the completed Development when assessed in combination with other cumulative developments. The duration of these effects is considered to be permanent. For the purposes of this TVIA, cumulative developments include committed schemes i.e., development currently under construction and developments with planning consent. The cumulative schemes considered as part of the EIA have been presented to LB Haringey and those relevant to the TVIA are listed in section 3 of this document.

2.67 The significance ratings given for cumulative effects are on the basis that the schemes that are under construction and consented will together already have a cumulative effect. The Development is considered a new, additional element in this cumulative scenario; its contribution to the cumulative effect is therefore assessed and given a significance rating. The overall cumulative effect is described but not given a significance rating, rather the assessment of significance relates to the individual contribution made by the Development to that existing cumulative effect.

2.68 In cases where the Development has an effect when considered in isolation but there are no relevant cumulative schemes or the Development does not act cumulatively with cumulative development, the significance rating will be indicated as ‘no cumulative effect’ for townscape and visual assessments. In

the case of visual effects, when the Development results in a ‘negligible’ or ‘no change’ effect, but other cumulative schemes are visible, the Proposed Development’s contribution will be one of ‘no change’ to the existing cumulative effect of already committed or emerging schemes.

ASSUMPTIONS AND LIMITATIONS

2.69 The methodology for assessing townscape, and visual effects in this TVIA includes some assumptions and has limitations.

- i. The baseline conditions have been established through site visits and reference to publicly accessible documentation relating to the Site and its surroundings.
- ii. The assessments have been carried out on site and in a real-life sense. The experience on the ground, however, can only be illustrated through photographs, AVRs, maps and plans. For this reason, readers of this document are encouraged to visit the Site and surrounding area with this TVIA in hand.
- iii. The views included in section 7 of the TVIA do not cover every possible view of the Development but are rather a broad spread of representative views from publicly accessible places or from points where there are particular conjunctions of heritage, townscape or visual sensitivity.
- iv. The ZTV analysis was only deployed to the radial limit capable within the VU.CITY software. To use more complex software for computer model views would be disproportionate given the visual obstructions in the townscape or landscape, such as buildings and trees, which may be not included in the data used for analysis but, in reality, would screen the visibility of the Development.
- v. The assessments have been based on a full knowledge of the scheme, the architects’ DAS, planning application drawings, and AVRs produced by visualisation specialists Miller Hare. The photorealistic AVRs included in section 7 are a useful tool for assessment, but there is a degree of professional judgment made by the visualisation specialists in the artistic representation of materials and the effects of weather conditions and natural light.
- vi. Assumptions have been made in the TVIA about the susceptibility of particular groups of people to visual changes in the urban environment and the types of people at particular viewpoints. These assumptions have been based on professional judgment but inevitably have limitations because in reality the responses of individuals are varied and not all can be covered in the assessment.

PROFESSIONAL STANDPOINT OF THE AUTHOR

2.70 Assessments in this TVIA are made from a professional point of view and from a particular standpoint. The standpoint is that of a townscape consultant employed by the applicant to quantitatively and qualitatively assess and advise on the design, as it was being developed by the architects and following feedback from consultees. The TVIA presents, therefore, the results of the townscape consultant’s independent professional advice. In accordance with guidance, however, the townscape and visual assessments are undertaken on an independent and transparent basis and weigh up both the positive and negative effects of the Development.

2.71 Naturally, for the qualitative assessments to be of substance and more than merely subjective, the assessor must have the necessary skills. Citydesigner is a consultancy of experienced professionals from the areas of architecture, urban design and heritage, all trained in townscape and architectural assessments by its founder, Richard Coleman, who has carried out design assessments since 1985.

PHOTOGRAPHY IN AVR PRODUCTION AND ASSESSMENT

2.72 In order to replicate, as near as possible, the experience of a human being when standing at a particular viewpoint, the AVRs in this TVIA have been produced in accordance with recognised good practice set out in the Visual Representation of Development Proposals Technical Guidance Note (2019) and in Appendix C of the London View Management Framework (LVMF) SPG (2012). The two-dimensional nature of an AVR and its limited field of view cannot, however, fully convey the visual experience of a new development in the townscape. For this reason, it is recommended that readers of this document and decision makers visit each viewpoint to fully understand the effects illustrated by each AVR. The AVR can be considered on site alongside the associated commentaries, which describe the effects likely to be experienced. It is understood, however, that not everyone is able to do this, and for those readers, the AVRs and associated commentaries remain an essential tool.

2.73 In line with the Visual Representation of Development Proposals Technical Guidance Note 06/19 (2019), all AVRs in this report fall under the Landscape Institute Visualisation Type 4 which are verified views and have the highest level of locational accuracy and conform to the standards set out in the guidance. The Development is illustrated based on the AVR Levels 0 to 3 set out in the LVMF. The different levels confirm the degree of visibility of the Development with either: a wireline image (AVR1) or a photorealistic render confirming the use of materials (AVR3).

2.74 For an easy reading of the assessment commentaries, the AVRs provided in this document are laid out next to the assessment text and are not bled to the full size of the page. To support decision makers, we can provide, on request, proposed AVRs bled to the edge of the page, which can be comfortably held up at the viewpoint to allow the effect to be understood within the real context.

2.75 It is often said that a photograph makes the subject look further away. This

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is true only in regard to a cursory comparison. If the photograph which is monocular is held at the correct distance to the eye which is binocular, it will replicate the view provided the viewer closes one eye. A person will tend to zoom in on the subject and is able to appreciate much greater detail than is normally possible with a photograph. In certain circumstances, where this is important to illustrate, zoomed photographs may be included in the assessment, or can be separately provided on request.

- 2.76 In the current GLVIA (2013) and the Visual Representation of Development Proposals Technical Guidance Note 06/19 (2019) it is accepted that the field of view and image size of photographs and photomontages should be selected to give a reasonably realistic view of how the townscape will appear when the image is held at a comfortable viewing distance from the eye (usually between 300 and 500mm). Good practice for townscape photomontage usually gives rise to a lens with a field of view of between 68 and 73 degrees so that sufficient context can be included to make the assessment meaningful. The field of view may be reduced to as little as 40 degrees in the case of particularly long-distance views. Accordingly, the lens sizes for AVRs in this report have been chosen with consideration of the particular nature of the site, location, surrounding context, view distance and the height of the Development. The visualisation specialist's methodology takes the guidance note into account and is included at Appendix 4 of this document.

USING AN ORIGINAL COPY OF THIS DOCUMENT

- 2.77 The AVRs in this TVIA originate from high resolution photographs. It is important to use an original copy printed at high resolution so that the detail can be fully understood. For this reason, the 'Contents' page of top-quality copy versions includes a Citydesigner hologram which guarantees the highest resolution. Photocopies or downloaded versions may not depict such a high level of definition.
- 2.78 In the case of digital copies, the file size of a high resolution version will be indicated on the 'Contents' page to enable readers to identify whether they have a top-quality digital version of the report. If the reader is only able to download low resolution split sections of the report from the local planning authority's planning portal, a combined high resolution pdf of the document can be provided upon request.

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3.0 THE SITE, CURRENT AND EMERGING CONTEXT

- 3.1 The Site lies within the London Borough of Haringey (LB Haringey), comprising Plots 1 to 6 of the Development for which there is an extant planning permission. Of these, Plot 1 (The Stadium) and Plot 2 (Tottenham Experience) have been completed and are operational. There is an extant full planning permission for a 23-storey hotel building on Plot 3. Plots 4-6 have outline permission for an Extreme Sports Building, Residential Buildings and a Community Centre respectively. It includes the construction of new and altered roads, footways, open spaces and landscaping.
- 3.2 The Consented Scheme (as described at paragraph 3.1 above) lies on the eastern side of the High Road. Adjacent to it, and forming part of the same urban block, are Lilywhite House and a large Sainsbury's store, north of the recently completed Tottenham Hotspur Stadium ('the Stadium').
- 3.3 Plot 3, where the design Amendments are proposed, is located to the south of the Stadium. Its location is shown in a red hatch in the adjacent map at Fig 3.1. It currently comprises a temporary podium (associated with the Stadium) which includes areas of public realm and temporary structures.



Fig. 3.1: Aerial view showing the Site and the location of Plot 3 (Google Earth, 2023).

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Fig. 3.2: Aerial view of the Site looking north-east (Google Earth, 2023). The Site is outlined in red and the Plot 3 is hatched in red.



Fig. 3.3: Aerial view of the Site looking northwest (Google Earth, 2023). The Site is outlined in red and the Plot 3 is hatched in red.