

Our ref: Q200691
Your ref: HGY/2023/2137
Email: Hannah.Cox@quod.com
Date: 31 October 2023



Samuel Uff
Housing, Regeneration and Planning Haringey Council
River Park House
225 High Road London
N22 8HQ

For the attention of Samuel Uff

Dear Samuel

TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)

PROPOSED S73 REVISIONS TO PLOT 3 (THE HOTEL) IN THE NORTHUMBERLAND PARK DEVELOPMENT (LPA REF. HGY/2015/3000)

TOTTENHAM HOTSPUR STADIUM, 748 HIGH ROAD, TOTTENHAM

I write on behalf of Tottenham Hotspur Property Company Limited ("THFC") ("the Applicant"), to submit amendments to planning application ref. HGY/2023/2137 which was submitted to the London Borough of Haringey ("LBH") for minor material amendments under Section 73 ("S73") of the Town and Country Planning Act 1990 (as amended), following to the grant of planning permission for the Northumberland Park Development Project ("NDP") ("the Site") on 15 April 2016 (LPA ref HGY/2015/3000).

The S73 application was validated on 7 August 2023 and since then various meetings have been held with Planning, Design and Sustainability Officers at LBH on 12, 25 and 28 September and 2 October 2023. The design was taken to the Quality Review Panel ("QRP") on 21 August 2023 and a Chairs Review was also held on 18 October 2023.

In these meetings a number of comments were raised in respect of the design of the building, the proposed landscaping and the overall sustainability approach. In response, the design team has made a series of design changes and a detailed summary of the amendments are provided in Section 2 below. These amendments also respond to the Greater London Authority ("GLA") Stage 1 Report which was issued on 3 October 2023.

1 Submission

Table 1 below provides a list of documents which were submitted to support the application. Updates and additional documents to explain and assess the proposed amendments are indicated in blue and any superseded documents are shown with a strikethrough. A revised drawing schedule is provided at Appendix 1 of this letter. Documents 6, 15 and 19 were issued on 24 October 2023.



Table 1: Revised Application Documents

No.	Document	Author
1	Application Form including Ownership Certificates	Quod
2	CIL Additional Information Form	Quod
3	Cover Letter (inc. Drawing Schedule) Cover Letter – Summary of Amendments (inc. Updated Drawing Schedule)	Quod
4	Design and Access Statement Addendum Design and Access Statement Addendum Update	F3 & Arup
5	Drainage Strategy	Buro Happold
6	Energy Strategy Addendum Energy Strategy Addendum Update	Buro Happold
7	Environmental Statement (ES) Addendum Environmental Statement Addendum Supplementary Note including: - Annex 1: Townscape and Visual Impact Assessment Addendum Update - Annex 2: Wind Microclimate Addendum Update - Annex 3: Daylight, Sunlight and Overshadowing Addendum Update	Quod (ES coordinators) with specialist input
8	Environmental Statement Non-Technical Summary Addendum	
9	Fire Statement and Gateway 1 Fire Form Fire Statement Update Gateway 1 Fire Form Update	OFR
10	Flood Risk Assessment	Buro Happold
11	Internal DSO Assessment	GIA
12	Lighting Statement	Buro Happold
13	Planning Statement (inc. S106 Draft Head of Terms)	Quod
14	Revised Application Drawings (refer to Appendix 1 of this letter for the revised Drawing Schedule)	F3
15	Sustainability Statement Addendum Sustainability Statement Addendum Update	Buro Happold
16	Transport Assessment Addendum Transport Assessment Addendum Update	Arup
17	Utilities Planning Report Addendum	Buro Happold
18	Whole Life Carbon Assessment	Buro Happold
19	Circular Economy Statement	Buro Happold
20	Supplementary Internal Daylight, Sunlight and Overshadowing Note	GIA



2 Proposed Amendments

The proposed amendments to the building are summarised and illustrated in Figure 1 below.

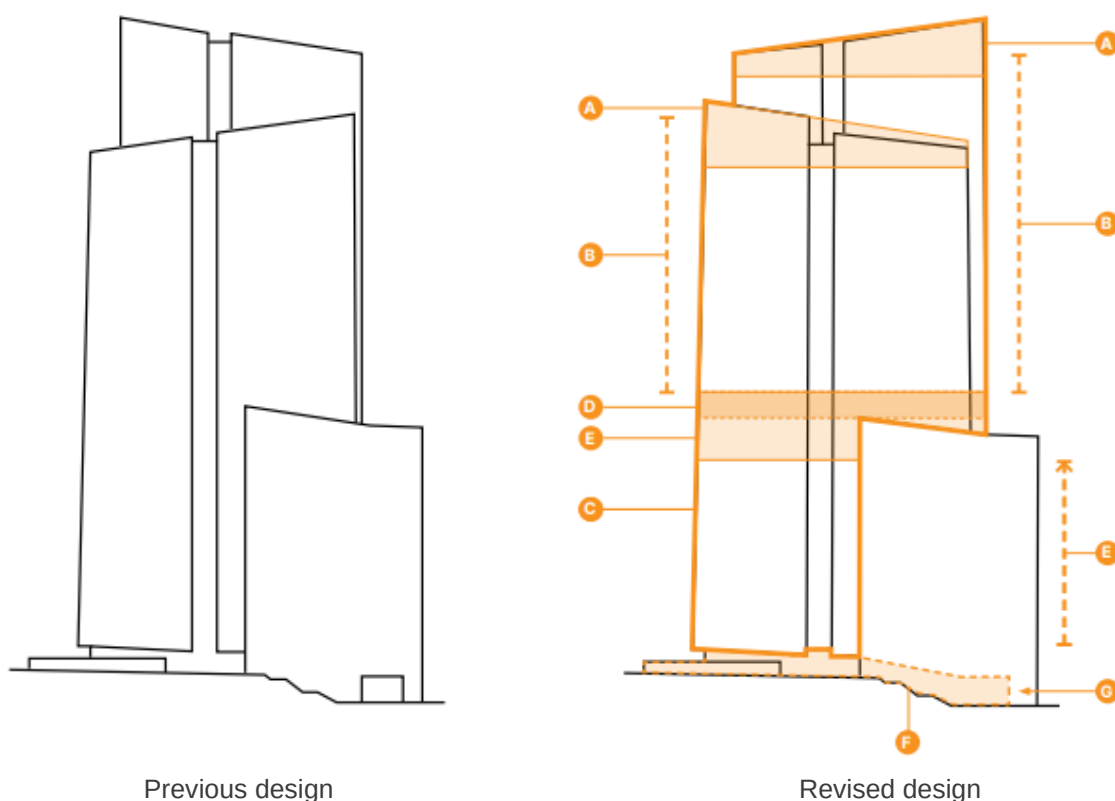
- **A. Top of Tower:** The top of the 'planar blades' have been mirrored and articulated to accentuate the building more as a landmark for the area. This consequentially changes the internal layout and aspect of the units and the façade detail and lighting. The plant rooms have also been relocated and the provision of PV panels has been added to the canopy roof. The overall height of the building does not change from the submitted scheme (127.20m AOD).
- **B. Balcony Materiality and Planters:** The residential balconies have been amended with a bronze finish to match the 'folding blades' and top of the tower. A dark grey upstand measuring 400mm to the inside of the balustrade to conceal the freestanding planters has been included.
- **C. Facade Materiality and Articulation:** The overall building energy efficiency, U-Value and thermal performance has been refined through the development of the façade. This has been achieved through:
 - The use of solid aluminium panels instead of the curtain wall system;
 - The use of glazing only where vision panels are required;
 - The combination of polished, matte and brushed aluminium panels;
 - The provision of solid openable panels within all habitable rooms; and
 - The rationalisation of all wall types by reducing the amount of glazing.
- **D. Residential Amenity Layout:** The Level 13 residential amenity terrace is now directly connected with the vertical core. This means that residents can access the residential amenity terrace without the need to pass through other internal spaces.
- **E. Hotel and Hotel Amenity Floors:** The number of hotel rooms has been reduced from 20 to 18 rooms per floor (now spanning Levels 02-11). The total number of hotel rooms does not change (180no.). The hotel amenity spaces have also been improved through the following design changes:
 - The pool has been rotated 90 degrees to maximise views towards Central London;
 - A mezzanine floor has been added;
 - The line of facade has been extended to increase floor area, and provide a double-height internal space; and
 - Minor adjustments to height of levels with no change to overall height of building
- **F. Ground and Podium Facade Interface:** The large grey columns have been omitted and replaced with a continuous light grey pre-cast concrete and glazed plinth to unify podium and ground level. The finish and character of this plinth will match the materials



within the Stadium. The entrances have been further articulated as a result. Additional planting is proposed at podium level and on the terrace.

- **G. Consolidated Access for Hotel and Amenity:** The hotel and amenity lobbies have been combined to create a grand architectural expression and hierarchy to all entrances at the base of the building. Cycle parking including visitor cycle parking is located internally and accessed through a cycle lift.
- **H. Artist Engagement:** A defined scope and brief for the arts interventions within the scheme is being developed by the Applicant.

Figure 1: Proposed amendments to the building



In addition to changes to the building, the design of the landscaping and public realm has also been improved following comments from LBH officers and the QRP. In summary, the landscape and public realm has been updated to better integrate with the wider public realm within the Stadium site. Additional planting is proposed on the east and west elevations and the introduction of two 'green walls' is proposed. The urban greening factor (UGF) has been increased from 0.135 to 0.157.

Further detail on the design development can be found in the Design and Access Statement Addendum Update.



Consequential changes are proposed to the footprint of the building and housing mix. The changes to the overall footprint are summarised below. Overall, there is a 3% increase for both the residential and hotel elements of the scheme. In the context of the wider masterplan, this is considered minimal.

Table 2: Summary of floorspace changes

	Residential (m ²)	Hotel (m ²)
Original Scheme	11,246	16,132
Revised Scheme	11,627	16,696

Condition A7 is therefore proposed to be amended to:

<i>The total quantum of built floorspace across the development shall not exceed the following: Land Use</i>	<i>Use Class</i>	<i>Area GIA (sqm)</i>	<i>Units</i>
<i>Leisure (including stadium)</i>	D2 F2(c)	122,000	n/a
<i>Hotel</i>	C1	15,537 [16,696]	180 rooms
<i>Residential</i>	C3	53,298	634
<i>Sui Generis/Tottenham Experience</i>	Sui Generis	4,311	n/a
<i>Business</i>	B1 E(g)	4,000 (max)	n/a
<i>Community and Culture</i>	D1 F1	6,000 (max)	n/a

As before, no change to the proposed to the site wide housing floorspace with the balance of floorspace being sufficient to deliver the remainder of the housing in the NDP scheme. The changes to housing mix are summarised in Table 3. As set out in our Note (issued 23 October 2023), the proposals will still provide a significant number of larger units with over 50% being provided as 3 bedrooms and above. Despite the reduction in larger units, over half of the units are proposed with three-bedrooms which is more than the one and two bedroom units combined. The housing mix is still compliant with Condition F10 and Policy DM11.

Table 3: Plot 3 Housing Mix

Unit size	Previous Mix		Proposed Mix	
	Units	%	Units	%
1 Bedroom	5	10%	6	12%
2 Bedroom	12	24%	18	37%
3 Bedroom	32	65%	25	51%
Total	49	100%	49	100%



3 Assessment

The proposed amendments result in significant improvements to the building design and public realm and follow extensive post submission engagement with planning, design, heritage and sustainability officers at the LBH and the GLA and the QRP. The acceptability of the proposed amendments in respect of energy, fire, sustainability, and transport is outlined below.

- **Energy** – the strategy has been amended with updated to reflect the modifications to the fabric performance and façade arrangement. Overall, the strategy shows a betterment of Part L2 by a further 10%.
- **Fire Strategy** – the proposed amendments result in improvements to fire safety strategy principles addressing: means of escape, fire service access and provisions and passive and active fire safety measures.
- **Sustainability** – the strategy has been updated to align with the modifications within the revised Energy Strategy Addendum and a Circular Economy Statement has been provided in response to the request from the GLA and the LBH.
- **Transport** – the assessment has been updated to reflect the design changes as well as comments received from the GLA and the LBH. The assessment now includes: an Active Travel Zone assessment, commentary on the servicing strategy, updates to reflect updates cycle parking access and updated vehicle tracking analysis.

Environmental Impact Assessment

The proposed changes have been informed and assessed by technical experts the results of which are provided in Environmental Statement Addendum Supplementary Note. In summary:

- **Townscape and visual impact** – the building is found to continue to be a significant enhancement to the nearby townscape character areas and in townscape views. The architectural design in particular was found to remain as very high calibre with the potential to revitalise this part of Haringey.
- **DSO** – the assessment found that the conclusions reported in the August 2023 report remain valid and the proposed scheme is considered to continue to provide the future occupants and users of the site with access to excellent levels of daylight and sunlight in the residential units and amenity areas.
- **Wind** – an expert review was carried out to assess the effect of the changes and to confirm the validity of the wind tunnel results. This concluded that the design changes are typically minor and that the scale, massing, orientation and exposure remains unchanged between the original and proposed scheme. The changes to wind microclimate are therefore confined to the regions where these changes are proposed and these were found to be minor.



Taking into account the proposed amendments listed in Section 2 above, the enclosed Environmental Statement Addendum Supplementary Note confirms that the proposed amendments result in no significant environmental effects and that the July 2023 ES Addendum remains valid for decision making.

Overall, the proposed amendments result in improvements to design in respect of townscape views, architectural expression and massing, as well as building design and efficiency, entrance legibility, user and residential experience and amenity, and sustainability and energy performance. In conclusion, the S73 application is still in accordance with national, strategic and local policy and planning permission should be granted for the proposed development.

I trust the enclosed is acceptable, but please do not hesitate to contact me if you have any questions or require further information.

Yours sincerely

Hannah Cox
Senior Planner

enc. Appendix 1 – Drawing Schedule
cc. Richard Serra – Tottenham Hotspur Football & Athletic Co. Ltd



Appendix 1

Drawing Schedule

Drawing Title	Drawing Reference	Revision (2016)	Revision (July 23)	Revision (Oct 23)
Application Site Boundary	POP-4494-PLN-GA-0119 THHTL-F3A-XX-EX-ST-A-089020	Rev-0	Rev P01.01	Rev P02
Comparison to Consented Scheme – Plans	POP-4494-PLN-GA-0140 THHTL-F3A-XX-ZZ-GA-A-089021	Rev-0	Rev P01.01	Rev P02
Comparison to Consented Scheme – Sections	POP-4494-PLN-SC-0142 THHTL-F3A-XX-ZZ-SE-A-089022	Rev-0	Rev P01.01	Rev P02
NPD Hotel LB1 - Southern Development	THHTL-F3A-XX-B1-GA-A-082020	Rev-0	Rev P01.01	Rev P02
NPD Hotel L00 - Southern Development	THHTL-F3A-XX-00-GA-A-082021	Rev-0	Rev P01.01	Rev P02
NPD Hotel L01 - Southern Development	THHTL-F3A-XX-01-GA-A-082022	Rev-0	Rev P01.01	Rev P02
Hotel Basement General Arrangement NDP Hotel Basement General Arrangement	POP-4494-PLN-GA-0300-0 THHTL-F3A-XX-B1-GA-A-082030	Rev-0	Rev P01.01	Rev P02
Hotel Level 00 General Arrangement NDP Hotel Level 00 General Arrangement	POP-4494-PLN-GA-0301-0 THHTL-F3A-XX-00-GA-A-082031	Rev-0	Rev P01.01	Rev P02
Hotel Level 01 General Arrangement NDP Hotel Level 01 General Arrangement	POP-4494-PLN-GA-0302-1 THHTL-F3A-XX-00-GA-A-082032	Rev-0	Rev P01.01	Rev P02
Hotel Level 02 General Arrangement	POP-4494-PLN-GA-0303-0	Rev-0		
Hotel Typical Floor Plan (Levels 03-14) General Arrangement NDP Hotel Typical Hotel Floor Plan (Levels 02-11) General Arrangement Plan	POP-4494-PLN-GA-0304-1 THHTL-F3A-XX-02+-GA-A-082033	Rev-0	Rev P01.01	Rev P02
NDP Hotel Level 12 General Arrangement	THHTL-F3A-XX-11-GA-A-082034	New drawing	Rev P01.01	Rev P02
NDP Hotel Level 13 Mezzanine General Arrangement	THHTL-F3A-XX-11M-GA-A-082035	New drawing	Rev P01.01	Rev P02



Appendix 1

NDP Hotel Level 14 Residential Amenity General Arrangement	THHTL-F3A-XX-12-GA-A-082036	New drawing	Rev P01.01	Rev P02
NDP Hotel Levels 15-20 Typical Resi General Arrangement	THHTL-F3A-XX-13-GA-A-082037	New drawing	Rev P01.01	Rev P02
Hotel Typical Floor Plan (Levels 15-21) General Arrangement	POP-4494-PLN-GA-0305-0	Rev 0	Rev P01.01	Rev P02
NDP Hotel Levels 15-20 21-26 Typical Resi General Arrangement	THHTL-F3A-XX-14+-GA-A-082038			
Hotel Level 22 General Arrangement	POP-4494-PLN-GA-0306-0	Rev 0	Rev P01.01	Rev P02
NDP Hotel Level 27 Residential General Arrangement	THHTL-F3A-XX-19+-GA-A-082039			
Hotel Level 23 General Arrangement	POP-4494-PLN-GA-0307-0	Rev 0	Rev P01.01	Rev P02
NDP Hotel Level 28 Residential General Arrangement	THHTL-F3A-XX-26+-GA-A-082040			
NDP Hotel Level 29 Residential General Arrangement	THHTL-F3A-XX-27-GA-A-082041		Rev P01.01	Rev P02
NDP Hotel Level 30 Residential General Arrangement	THHTL-F3A-XX-28+-GA-A-082042		Rev P01.01	Rev P01
Hotel Roof Plant General Arrangement	THHTL-F3A-XX-RFP-GA-A-082043		Rev P01.01	Rev P02
Hotel Roof General Arrangement	POP-4494-PLN-GA-0308-0	Rev 0	Rev P01.01	Rev P01
Hotel Roof Mezzanine General Arrangement	THHTL-F3A-XX-RF-GA-A-082044			
Hotel Roof General Arrangement	THHTL-F3A-XX-RF-GA-A-082045			Rev P02
Hotel Western Elevation	POP-4494-PLN-EL-0330-0	Rev 0	Rev P01.01	Rev P02
Western and Eastern Elevation	THHTL-F3A-XX-ZZ-EL-A-082501			
Hotel Eastern Elevation	POP-4494-PLN-EL-0331-0	Rev 0	Rev P01.01	Rev P02
Northern and Southern Elevation	THHTL-F3A-XX-ZZ-EL-A-082502			
Hotel Northern Elevation	POP-4494-PLN-EL-0332-0	Rev 0	Rev P01.01	Rev P02
Illustrative Western High Road Elevation	THHTL-F3A-XX-ZZ-EL-A-082505			
Hotel Southern Elevation	POP-4494-PLN-EL-0333-0	Rev 0		
Hotel Section A-A	POP-4494-PLN-SC-0320-0	Rev 0	Rev P01.01	Rev P02
Longitudinal Section	THHTL-F3A-XX-ZZ-SE-A-082630			
Hotel Section B-B	POP-4494-PLN-SC-0321-0	Rev 0	Rev P01.01	Rev P02
Cross Section South and North	THHTL-F3A-XX-ZZ-SE-A-082631			



Appendix 1

Hotel Accessible Rooms Apt Variations Enlarged Plan	POP-4494-PLN-EP-0340-0	Rev 0	Rev P01.01	Rev P02
Hotel Accessible Residential Units Enlarged Plan	THHTL-F3A-XX-XX-DE-A-082100			
Hotel Accessible Residential Units Enlarged Plan II	THHTL-F3A-XX-XX-DE-A-082101	New drawing	Rev P01.01	Rev P02
Bay Study – Base of Building 01	THHTL-F3A-XX-XX-DR-A-082110	New drawing	Rev P01.01	Rev P02
Bay Study – Base of Building 02	THHTL-F3A-XX-XX-DR-A-082111	New drawing	Rev P01.01	Rev P02
Bay Study – Middle of Building	THHTL-F3A-XX-XX-DR-A-082112	New drawing	Rev P01.01	Rev P02
Bay Study – Top of Building	THHTL-F3A-XX-XX-DR-A-082113	New drawing	Rev P01.01	Rev P02
Wall Type 01 - Residential Planar Blade	THHTL-F3A-XX-XX-DR-A-082120	New drawing	Rev P01.01	Rev P02
Wall Type 02 - Recessed Infill N/S	THHTL-F3A-XX-XX-DR-A-082121	New drawing	Rev P01.01	Rev P02
Wall Type 03 - Recessed Infill E/W	THHTL-F3A-XX-XX-DR-A-082122	New drawing	Rev P01.01	Rev P02
Wall Type 04 - Recessed Infill Balconies	THHTL-F3A-XX-XX-DR-A-082123	New drawing	Rev P01.01	Rev P02
Wall Type 05 - Folding Blade	THHTL-F3A-XX-XX-DR-A-082124	New drawing	Rev P01.01	Rev P02
Wall Type 06 - Pre-Cast Panels	THHTL-F3A-XX-XX-DR-A-082125	New drawing	Rev P01.01	Rev P02
Landscape General Arrangement	POP-4494-PLN-GA-8000	Rev 0	P01	
Landscape General Arrangement Strategic Sitewide	278880-ARP-00-DR-L-15001			
Landscape Detailed Area Sheet 03 of 04	POP-4494-PLN-GA-8003	Rev 0		
Landscape General Arrangement Street Level	278880-ARP-00-DR-L-15101	New drawing	P01	P02
Landscape General Arrangement Podium Level	278880-ARP-01-DR-L-15102	New drawing	P01	P02

Notes

- Drawings with a ~~strike through~~ have been superseded
- Drawings outlined in **red** are new drawings