

Tottenham Hotspur Stadium (Plot 3, Section 73)

Local Planning Authority: Haringey

Local Planning Authority reference: HGY/2023/2137

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Minor material amendments (Section 73) to the height, design, maximum floorspace, and associated works to Plot 3 (hotel/residential) of hybrid planning permission HGY/2015/3000 through variation of conditions A4 (consented drawings and documents), A6 (conformity with environmental statement), A7 (maximum quantity/ density), and D1 (Plot 3 specific drawings); including an increase in height from 23 to 29 storeys and an increase in hotel floorspace from 15,537 sq.m. to 16,132 sq.m.

The applicant

The applicant is **Tottenham Hotspur Property Company Ltd** and the architect is **F3**.

Strategic issues summary

Land use principles: The uses have been established by the original extant consent and no changes are proposed to the permitted uses, which remain supported.

Affordable housing: The 2016 hybrid permission secured no affordable housing due to the significant funding challenge associated with provision of the new stadium, which required other elements of the development to contribute towards its construction. Although no additional housing is proposed, the changes to the hotel element would materially alter the economic circumstances of the scheme, and the application should therefore be considered under the viability tested route.

Historic environment: Compared to harm identified to the significance of heritage assets through the original hybrid permission, GLA officers consider that no additional harm would be caused.

Urban design: The Local Plan identifies the location as suitable for tall buildings. The increased slenderness of the building compared to that permitted is supported, and the limited increase in height does not raise strategic concerns. The layout of public realm would be improved compared to the permitted scheme.

Transport: An Active Travel Zone assessment and Road Safety Audit should be undertaken, and a bus contribution secured.

Climate change and environment: Further information is required on energy, whole lifecycle carbon, circular economy, green infrastructure, and water.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 74. Possible remedies set out in this report could address these deficiencies.

Context

1. On 22 August 2023, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is submitted under Section 73 of the Town and Country Planning Act 1990 (as amended), following the grant of planning permission for the Northumberland Park Development Project in 2016 (GLA ref: D&P/2292g/02; LPA ref: HGY/2015/3000), an application of Potential Strategic Importance referable under the following categories of the Schedule to the Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3. Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the [GLA's public register](#)¹.

Site description

6. The Plot 3 site forms part of the ongoing phased redevelopment of Tottenham Hotspur Stadium and associated surrounding land, as approved by the 2016 Hybrid Consent (see 'case history' below). The Plot 3 site is bounded by the Stadium to the north; two temporary five a-side football pitches and events space to the east, granted planning permission in 2022 (LPA Ref: HGY/2022/0167); Park Lane to the south; and the Tottenham Experience building to the west. It currently comprises a temporary podium (associated with the Stadium), which includes areas of public realm and temporary structures.

¹ <https://planapps.london.gov.uk/planningapps/HGY-2023-2137>

7. The Tottenham High Road/North Tottenham Conservation Area lies adjacent to the site to the north-west and south-west. There are several statutorily and locally listed buildings surrounding the site, including the Grade II Listed Warmington House (744 High Road) to the west, which has been incorporated into the Tottenham Hotspur Experience building. Other listed buildings include 774 (Fletcher House), 790 (Dial House), 792, 794, 796 (Percy House), 798-802, 808 & 810 High Road; with a locally listed public house (732 High Road) opposite the site to the south.

8. The site is close to the A1010 High Road, which forms part of the Strategic Road Network (SRN). The A10 Bruce Grove/A1010 High Road junction and the A406 North Circular Road/A1010 Fore Street junction are respectively a kilometre to the south and 1.4 kilometres to the north, and are the nearest points of vehicular access to the Transport for London Road Network (TLRN). White Hart Lane station (London Overground and Greater Anglia) is 500 metres to the north-west, and Bruce Grove station is 900 metres to the south. Northumberland Park station (National Rail) is 800 metres to the east. Seven Sisters station (Victoria Line and London Overground) is over 2 kilometres to the south, and Tottenham Hale (Victoria Line) is 2.3 kilometres to the south-west. The nearest bus stops are along the High Road, served by 149, 259, 279, 349, and N279, with other bus routes from Northumberland Park station (341, 476, W3). The site is within 500 metres of Cycleway 1. The site has a Public Transport Accessibility Level (PTAL) of 5, where 0 is the least accessible, and 6b the most accessible.

Details of this proposal

9. The application is for minor material amendments (Section 73) to the height, design, maximum floorspace, and associated works to Plot 3 (hotel/residential) of the hybrid planning permission through variation of conditions A4 (consented drawings and documents); A6 (conformity with environmental statement), A7 (maximum quantity/density) and D1 (Plot 3 specific drawings).

10. Specifically, the height and mass of the proposed hotel building would change, including an increase in height from 23 to 29 storeys. Hotel floorspace would increase from 15,537 sq.m. (as shown in the table under 'case history' below), to 16,132 sq.m. (GIA), with no increase in the maximum number of hotel rooms (180) and no increase in maximum residential floorspace or homes across the wider site. A second stairway has also been included for improved fire safety. Other changes are proposed to the landscaping, play space, access, and parking. The applicant states that the revisions are intended to enhance the deliverability of the scheme as a result of engagement with hotel operators.

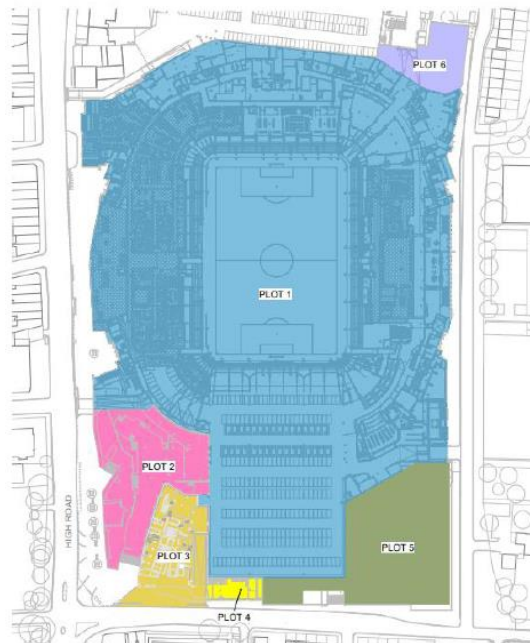
Case history

11. Plot 3 forms part of the ongoing phased redevelopment of the Northumberland Park Development Project (NDP), for which the Hybrid Consent was approved in 2016 for:

“Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities

including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of 'appearance' and 'landscape' are reserved in relation to the residential buildings and associated community and/or office building. Details of 'appearance' and 'scale' are reserved in relation to the sports centre building. Details of 'appearance' are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001)."

12. Full planning permission was granted for the Stadium (Plot 1: Blue in the diagram below), the Tottenham Experience (Plot 2: Pink), and the Hotel (Plot 3: brown); and outline planning permission for the Extreme Sports Building (Plot 4; yellow), the Residential Buildings and Flexible B1/D1 Space (Plot 5: green) and the Community Health Building (Plot 6; purple).



13. Plots 1 and 2 have been implemented and were completed in 2019. Plot 3 has been implemented up to ground level. Reserved matters relating to the scale of Plot 4 (the Extreme Sports Building) was approved in 2021 (LPA ref: HGY/2021/1039). An application for reserved matters relating to the landscaping of Plot 5 (residential buildings and flexible B1/D1 space) was submitted in 2022 and is under consideration by the Council (LPA ref: HGY/2022/4504). An application for reserved matters relating to the appearance of Plot 6 (the Community Health Building) was approved by the Council in 2021 (LPA ref: HGY/2021/1043).

14. The Council also granted approval for various non-material amendment applications (Section 96A), including the removal of the 90 day restriction on operation of the hotel serviced apartments, for Use Class C3 (LPA ref: HGY/2017/1183) but with no increase in overall maximum residential use across the hybrid scheme. The approved site-wide maximum floorspace figures are now as below.

15. No pre-application discussions have taken place with GLA officers concerning the Plot 3 section 73 application; however, pre-application discussions have taken place with Council officers and the Council's Quality Review Panel.

Land Use	Use Class	Area (GIA sq.m.)	Units
Leisure (including stadium)	D2	122,000	n/a
Hotel	C1	15,537	180 rooms
Residential	C3	53,298	634
Tottenham Experience	Sui Generis	4,311	n/a
Business	B1	4,000 (max)	n/a
Community and Culture	D1	6,000 (max)	n/a

Strategic planning issues and relevant policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Haringey Strategic Policies 2013 (with alterations adopted 2017); Haringey Development Management DPD (2017); Site Allocations DPD (2017); Tottenham Area Action Plan (2017); and the London Plan 2021.

17. The following are also relevant material considerations:

- National Planning Policy Framework; National Planning Practice Guidance.
- The National Design Guide.
- On 24 May 2021, a Written Ministerial Statement (WMS) was published in relation to First Homes. To the extent that it is relevant to this particular application, the WMS has been taken into account by the Mayor as a material consideration when considering this report and the officer's recommendation. Further information on the WMS and guidance in relation to how the GLA expect local planning authorities to take the WMS into account in decision making can be found [here](#)².

18. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are:

- Opportunity Area *London Plan.*
- Town centre uses *London Plan.*
- Housing *London Plan; Housing SPG; Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG; Housing Design Standards LPG.*
- Affordable housing *London Plan; Housing SPG; Housing Strategy; Affordable Housing and Viability SPG; Affordable Housing draft LPG; Development Viability draft LPG.*

² https://www.london.gov.uk/sites/default/files/first_homes_planning_practice_note_.pdf

- Historic environment *London Plan.*
- Urban design *London Plan; Character and Context SPG; Accessible London SPG; Public London Charter LPG; Housing SPG; Play and Informal Recreation SPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity LPG; Housing Design Standards LPG; Public London Charter LPG; Fire Safety draft LPG.*
- Transport *London Plan; Transport Strategy; Sustainable Transport, Walking and Cycling LPG.*
- Climate change/environment *London Plan; Environment Strategy; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; Energy Planning Guidance; 'Be Seen' Energy Monitoring Guidance LPG; Control of dust and emissions during construction and demolition SPG; Air Quality Neutral LPG; Air Quality Positive LPG; Urban Greening Factor LPG.*

Land use principles

19. The uses have been established by the original extant consent and no changes are proposed to the permitted uses, which remain supported. There are no significant changes to the policy context in this respect. London Plan Policy E10 supports serviced accommodation, such as hotels, as part of London's visitor infrastructure, particularly in Opportunity Areas and where well-connected by public transport. The site is immediately adjacent to Tottenham Hotspurs Stadium, a major visitor attraction. London Plan Policy H1 supports residential development, and Haringey has a ten year housing completion target of 15,920 to which the proposals would contribute.

Housing

Affordable housing

20. London Plan Policy H4 seeks to maximise affordable housing delivery, with the Mayor setting a strategic target for 50% of all new homes to be genuinely affordable. London Plan Policy H5 states that the threshold level of affordable housing is a minimum of 35%. Schemes can follow the 'fast track' viability route and are not required to submit viability information nor be subject to a late stage viability review if they meet or exceed the relevant threshold level of affordable housing on site without public subsidy; are consistent with the relevant tenure split; meet other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor; and demonstrate that they have taken account of the strategic 50% target and have sought grant to increase the level of affordable housing.

21. Haringey has a Borough-wide target of 40% affordable housing, 60% to be social/affordable rent and 40% intermediate.

22. The hotel building includes 49 homes, as already permitted. Across the hybrid scheme, the maximum number of homes and floorspace (53,298 sq.m. and 634 homes), as well as the controls on housing mix, would remain as already permitted.

23. The independent viability assessment for the original hybrid permission conducted by the Council's advisers identified a significant funding challenge associated with the Stadium, which required other elements of the development to contribute towards the Stadium. Consequently, no affordable housing was secured in 2016. This position was confirmed via a later viability review upon completion of the Stadium.

24. The current proposals do not increase the maximum number of homes or floorspace within the wider scheme; however, the changes to the hotel element would materially alter the economic circumstances of the scheme. The applicant states that the scheme is being amended to make it more appealing to hotel operators, which would make the scheme more viable. GLA officers therefore consider that the application should be considered under the viability tested route. It is recommended that the Council appoint a consultant with specialist knowledge of the London hotel sector to assess additional value generated by the scheme. Viability information should be shared with GLA officers for their review to ascertain whether additional affordable housing can be provided as a result of the scheme amendments.

25. In response to London Plan Policy S4, a small amount of play space would be provided on the site, with more to be provided on Plot 5, together with existing provision nearby.

Historic environment

26. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and avoid harm. London Plan Policy D9 states that tall buildings should avoid harm to heritage assets, or demonstrate clear public benefits that outweigh any harm.

27. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*. Regarding listed buildings, special regard must be had to desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a development leads to 'less than substantial' harm, the harm should be weighed against the public benefits.

28. The hybrid permission involved the demolition of non-designated heritage assets, and the construction of a number of large-scale buildings, resulting in various levels of harm to designated and non-designated assets. The demolitions have now taken place and the Stadium constructed.

29. The height of the hotel would increase from 23 to 29 storeys; however, it would also become more slender when viewed from east and west and would remain below the permitted height of the residential plot. Compared to the harm identified as part of the original hybrid permission, GLA officers consider that no additional harm to the significance of heritage assets would be caused, although the harm caused

means that the proposals would not be in accordance with London Policy HC1. In line with the NPPF, this harm will be weighed against the public benefits of the proposal at the Mayor's decision-making stage.

Urban design

30. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

31. London Plan Policy D4 sets out that development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made or demonstrate that they have undergone a local borough process of design scrutiny. It is noted that the proposed amendments have been subject to review by the Council's Quality Review Panel

Site layout

32. The requirement for additional stairways has resulted in a widening of the east-west building plan form by c.8 metres, which also allowed a shortening of the north-south plan form by c.5 metres. The hotel building's east facade is now closer to the outline approved Plot 4 Extreme Sports Building; however, considering the leisure uses, with the residential use above the height of the Extreme Sports Building, no privacy or daylight concerns arise.

33. A reduction in the ground level footprint of the hotel fronting onto Park Lane also means that the proposed public realm offers greater openness and clearer sight lines to both the existing podium access (stairs and lift), and the extended podium at the upper level. This also allows a more civic entrance plaza/square at the junction between Park Lane and the High Road, which is welcomed. Provision of stair and lift access to the podium remain largely as previously proposed.

Tall buildings, height, massing, and architecture

34. London Plan Policy D9 states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify appropriate tall building heights on maps in Development Plans (Parts A and B). Policy D9 also sets out further requirements for assessing tall buildings (Part C) including addressing visual impacts at different distances; aiding legibility and wayfinding; having exemplary architecture and materials; avoiding harm to heritage assets (or demonstrating clear public benefits that outweigh any harm); not causing adverse glare; and minimising light pollution. Functional impacts should consider internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts should consider wind, daylight, sunlight, and temperature; air movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered.

35. Haringey's Local Plan defines tall buildings as ten storeys and above, and the site is within the North Tottenham area identified as suitable for tall buildings, although no heights are identified. The principle of locating tall building on the site has already been accepted through the hybrid consent, and the proposed hotel would remain below the permitted height of the tallest residential building (up to 131 metres, c.35 storeys). It is noted that tall buildings are consented to the west on the opposite side of the High Road, with further tall buildings in emerging schemes.

36. In terms of visual impacts, the revised design maintains the consented slender profile when viewed from the north and south, but improves its slenderness from east and west. The tower is broken down into a hierarchy of three stepped elements, which breaks down the massing, with each step forming an accessible terrace associated with the internal uses of the building. The bronze coloured cladding at lower levels relates well to surrounding materials, with the lighter glazed facades at upper levels reducing the impact of the taller elements. The hotel would perform a clear legibility function, marking the location of the Stadium. Strategic views would not be harmed and no additional harm would be caused to heritage assets.

37. Functional concerns in relation to transport require resolution, as set out under 'transport' below. Environmental impacts identified under 'climate change and environment' below require resolution.

38. The limited increase in height does not raise strategic concern; however, GLA officers will have regard to compliance with Policy D9 as a whole at the Mayor's decision-making stage.

Residential quality

39. London Plan Policy D6 states that qualitative aspects of a development are key to ensuring successful sustainable housing, with further standards and guidance set out in the Housing Design Standards LPG. The relatively small footprint of the building allows very good residential quality, including 100% dual aspect.

Fire safety

40. London Plan Policy D12 requires a fire safety statement prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments, where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. The Mayor has also consulted on a Fire Safety Draft LPG.

41. The submitted Stage 3 Fire Strategy Report and the Gateway One Fire Statement prepared by OFR meet the requirements of London Plan policies. The proposals include residential uses in a building over 18 metres, and the amendments add a second staircase in accordance with Policy D12 and the recent [government](#)

[announcement](#)³. The Fire Statements/Reports should be secured by condition or legal agreement.

Inclusive access

42. Policy D5 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). Policy D7 requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The applicant would provide 10% of the rooms as wheelchair accessible, which would be acceptable.

43. The application confirms that 10% (5) of the homes would meet Building Regulation M4(3), with the remainder meeting M4(2) requirements. These would be distributed across sizes and floors. Typical layouts have been provided. The Council should secure M4(2) and M4(3) requirements by condition. Seven disabled persons parking spaces in the basement have already been delivered.

Transport

Public Transport improvements

44. There has been significant investment in the transport network in the area since the 2016 consent. Cycleway 1, 500 metres to the west, has been completed; Northumberland Park station has been upgraded as part of improvements to rail capacity between Stratford and Angel Road, including a third track; Angel Road Station has been replaced by the new Meridian Water station; White Hart Lane station has been rebuilt, including higher capacity and step-free access; Tottenham Hale station has been improved, including a new bus station, upgraded taxi rank, new entrance, concourse, and step-free access; and public realm improvements have been completed on White Hart Lane and around Northumberland Park.

45. The Transport Assessment (TA) addendum provides a person-trip assessment, and based on the 2015 bus mode share, this indicates 60 bus (access and main mode) trips during the AM peak, and 70 during the PM peak. Based on secured bus contributions from schemes within in the vicinity of the site, a contribution of £48,000 would be proportionate, which could be pooled with other secured bus contributions.

Healthy Streets and Vision Zero

46. An Active Travel Zone (ATZ) assessment, including night-time assessment, should be undertaken, particularly given the increased quantum of development, the nature of the land use, and changes in the local area since 2015. The scope of the assessment should be agreed with TfL and the Council. As well as non-event day assessment, this should consider issues for active travel access on an event day,

³ <https://www.gov.uk/government/news/long-term-plan-for-housing>

and measures proposed to ensure walking and cycling to the site is unimpeded, as well as access to public transport services.

47. In line with TfL/GLA Women's Safety and Anti-Racism actions, analysis of personal safety statistics and proposed responses should be included. Further information is available in the [Mayor's Women's Night Safety Charter Toolkit](#)⁴.

48. Tottenham Hotspur Stadium Local Area Management Plan has been in practice since 2019, designed to limit impact on local residents and businesses on event days, as well as managing movements to and from the Stadium. The applicant should demonstrate that the proposed amendments would be compatible with these arrangements, both during construction and operation.

Access, delivery and servicing arrangements

49. The TA addendum includes evidence of engagement with Haringey highways related to access, delivery, and servicing arrangements. The forecast vehicle trip assumptions are reasonable. Further information should be provided on more sustainable approaches to servicing and deliveries, including though not limited to booking system, consolidation, and cargo bikes. There is potential conflict between active modes, and delivery and service vehicle movements. The TA addendum should set out how servicing and deliveries are proposed to operate on event days.

50. The overlay of active mode routes (cycle and pedestrian) and delivery vehicles should be provided, which will help identify any potential conflicts. A Stage 1 Road Safety Audit (RSA) should be provided for the proposed access arrangements on Park Lane. A Healthy Streets Designers Check or similar is also recommended. There should be no impacts on the Strategic Road Network (High Road), and arrangements should contribute to Vision Zero objectives and mode shift.

Cycle parking

51. The TA Addendum proposes cycle parking in accordance with London Plan policy requirements and London Cycle Design Standards (LCDS), which is welcomed. Plans that confirm dimensions are in accordance with the LCDS should be provided, including lift dimensions and number and width of doors, including at least 20% Sheffield stands and a further 5% wider spaces for non-standard bicycles. For staff, end of journey facilities should be provided such as lockers and showers. The route from the cycle parking area to Cycleway 1 should be assessed as part of the ATZ assessment.

Car parking

52. The hybrid consent included 76 car parking spaces at basement level, which have been constructed as part of the wider scheme. Due to the increase in the cycle parking provision, the number of car parking spaces is proposed to be reduced to 7 wheelchair accessible spaces and 57 standard spaces. The reduction in car parking compared to the 2015 consent is welcomed; however, the current London Plan requires car free development given the nature of the land use and the location, and

⁴ https://www.london.gov.uk/sites/default/files/wncs_toolkit_final.pdf

alternatives use for the spaces should be considered. The approach to Electric Vehicle Charging Points and disabled persons' car parking is acceptable. A Parking Design and Management Plan should be secured with any permission.

Travel Plan and construction logistics

53. A framework Travel Plan has been provided, which sets out specific objectives in support of London Plan policy and sets out baseline mode share forecasts. Further information on target mode share targets should be provided.

54. Further information on the approach to construction should be provided, and confirmation if a site-specific Construction Logistics Plan is proposed.

Climate change and environment

Energy strategy

55. London Plan Policy SI2 sets out energy strategy requirements for major development proposals; Policy SI3 sets out requirements for energy infrastructure; and Policy SI4 sets out requirements to manage heat risk. All major developments are required to meet a net-zero carbon target and only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, a contribution to a carbon offset fund or reductions provided off-site can be considered.

56. The submitted energy statement does not yet comply with Policies SI2, SI3, and SI4. The applicant is required to further refine the energy strategy and submit clarifications on specification; further details to demonstrate the cooling hierarchy has been followed; further information on proposed connection with Energetik; demonstration that renewable energy has been maximised; and confirmation of compliance with 'Be Seen' requirements, to be secured by section 106 agreement.

57. For the domestic element, the development is estimated to achieve an 80% reduction in CO2 emissions, compared to 2021 Building Regulations. This falls short of the net zero-carbon target, although it meets the minimum 35% reduction on site. For the non-domestic element, a 4% reduction is expected, which falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site. The carbon savings should be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured, based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or the Borough's carbon offset price. Detailed technical comments, including conditions and section 106 requirements have been shared with the applicant and the Council.

Whole Life-cycle Carbon

58. London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions and demonstrate actions taken to reduce life-cycle carbon emissions. The Mayor has published a Whole Life-Cycle Carbon (WLC) Assessment LPG and a reporting template⁵.

⁵ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

59. The applicant has submitted a WLC report which appears to cover much of the assessment requirements; however, the GLA template must also be submitted. This is important to allow results to be recorded and tracked through to post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made. Should permission be granted, post-construction monitoring should be secured through planning condition or legal agreement⁶.

Circular Economy

60. Policy SI7 of the London Plan requires applications that are referable to the Mayor to submit a Circular Economy (CE) Statement, and Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The Mayor has published a Circular Economy Statements LPG.

61. No Circular Economy Statement has been submitted. The applicant should provide a Circular Economy Statement in line with the LPG, including the completed Excel template. Should permission be granted, post-construction monitoring should be secured through planning condition or legal agreement⁷.

Green infrastructure

62. London Plan Policy G1 states that development proposals should incorporate green infrastructure. Policy G4 states that development proposals should where possible create areas of publicly accessible open space. Policy G5 states that major development should include urban greening as a fundamental element of site/building design and an Urban Greening Factor (UGF) of 0.4 is recommended for predominately residential schemes, as detailed in the Urban Greening Factor LPG.

63. The proposals integrate green infrastructure and urban greening, including the incorporation of biosolar roofing, which supports multifunctionality, in accordance with Policy G1. It includes public realm areas with planting, in accordance with London Plan Policy G4, which is particularly important as the site is in an area identified as being deficient in public open space within the London Green Infrastructure Focus Map. The UGF score is calculated as 0.14, which is considerably below the target set by Policy G5. Whilst there are some positive features, the applicant should review the proposals to increase the UGF. Robust justification should be provided if the target score cannot be achieved.

Flood risk, sustainable drainage, and water consumption

64. London Plan Policy SI12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is addressed. Policy SI13 states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible, in line with the drainage hierarchy. Policy SI5 states that development proposals should minimise the use of mains water; incorporate measures to help achieve lower water

⁶https://www.london.gov.uk/sites/default/files/model_condition_-_whole_life-cycle_carbon_23-3-22.pdf

⁷https://www.london.gov.uk/sites/default/files/suggested_circular_economy_conditions_version_24.03.22.pdf

consumption; ensure that adequate wastewater infrastructure capacity is provided; and minimise the potential for misconnections between foul and surface water.

65. The site is in Flood Zone 1, with a small area to the south-west being within Flood Zone 2, and is within a Critical Drainage Area. A Flood Risk Assessment (FRA) has been submitted. It should also be confirmed in the FRA that ground levels within Flood Zone 2 would remain as existing, and as such, will not displace fluvial floodwater off-site. Latest EA reservoir mapping shows that the southern extent of the site is at risk of reservoir flooding when river levels are normal. If the applicant can confirm the ground levels in Flood Zone 2 remain the same and that no sensitive receptors are proposed, a Flood Warning and Evacuation Plan (FWEP) should not be required. There is the potential for elevated groundwater beneath the site, and groundwater monitoring should be undertaken to inform the exact mitigation measures required, to be secured by condition. The level of risk to the site from sewers is unclear as this is not fully reviewed in the FRA. Further information should be provided, including the analysis of local sewer networks. The FRA provided for the proposed development does not yet comply with Policy SI12.

66. In terms of sustainable drainage, a greenfield runoff rate has been provided in Appendix E, the SuDS Proforma; however, this has not been referenced in the main body of the report and no consideration has been given to the practicality of discharging at greenfield rate. Discharge rates can be readily restricted to well below 5l/s. The drainage strategy assumes that infiltration is not feasible; however, there is a reasonable possibility that the site is suitable for infiltration. Soakage tests at various points should be undertaken to examine the feasibility of infiltration.

67. The drainage strategy proposes below ground attenuation tanks. Rainwater harvesting and green roofs should also be provided to satisfy the requirements of Policy SI13. A conservative scenario has been adopted whereby no reuse of rainwater is assumed. The applicant should revise the drainage strategy to incorporate a range of SuDS to provide the required water quantity, quality, biodiversity, and amenity benefits. No calculations for the greenfield runoff rate are provided, which does not provide sufficient detail to support the proposed drainage strategy. Hydraulic calculations should be provided, including a range of return periods and storm durations, and included on the drainage drawings. An assessment of exceedance flood flow routes above the 100-year event plus 40% climate change is discussed; however, these should be presented and included on drainage strategy drawings. The surface water drainage strategy does not yet comply with Policy SI13.

68. In terms of water efficiency, no water efficiency information has been provided for the residential component. The Sustainability Statement notes that 3 Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 40%, in line with Policy SI5. Water efficient fittings, and leak detection systems are proposed, which is welcomed. The applicant should also include water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit. The proposed development does not yet meet the requirements of Policy SI5.

Air quality

69. London Plan Policy SI1 states that development proposals should not lead to deterioration of existing poor air quality; should not create any new areas that exceed air quality limits or delay compliance in areas that are in exceedance of legal limits; and should not create unacceptable risk of high levels of exposure to poor air quality. Proposals must be at least Air Quality Neutral and large-scale development proposals should provide an air quality positive statement. Air Quality Neutral and Air Quality Positive LPGs have been published.

70. The air quality assessment is of sufficient technical quality. Previous modelling is still relevant as there is no increase in traffic generation or car parking. The development is air quality neutral and is in accordance with Policy SI1.

Local planning authority's position

71. Haringey Council planning officers are currently assessing the application. In due course the Council will formally consider the application at planning committee.

Legal considerations

72. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 of the Order to refuse the application; or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

73. There are no financial considerations at this stage.

Conclusion

74. London Plan policies on land use, affordable housing, historic environment, urban design, and climate change and environment are relevant to this application. The application does not yet comply with all of these policies, as summarised below:

- **Land use principles:** No changes to the land uses in the extant consent are proposed, and the uses remain supported.
- **Affordable housing:** The hybrid permission secured no affordable housing due to the significant funding challenge associated with provision of the new stadium, which required other elements of the development to contribute towards its construction. Although no additional housing is proposed, the

changes to the hotel element would materially alter the economic circumstances of the scheme, and the application should therefore be considered under the viability tested route.

- **Historic environment:** Compared to harm identified to the significance of heritage assets through the original hybrid permission, GLA officers consider that no additional harm would be caused.
- **Urban design:** The Local Plan identifies the location as suitable for tall buildings. The increased slenderness of the building compared to that permitted is supported, and the limited increase in height does not raise strategic concerns. The layout of public realm would be improved compared to the permitted scheme.
- **Transport:** An Active Travel Zone assessment and Road Safety Audit should be undertaken, and a bus contribution secured.
- **Climate change and environment:** Further information is required on energy, whole lifecycle carbon, circular economy, green infrastructure, and water.

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