

Our ref: Q230098.EIA Compliance Note.1.1.MT
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Date: 09/04/2024

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Northumberland Development Project Section 73 Application (Ref: HGY/2023/2137): Environmental Impact Assessment Compliance Note

Introduction

This Environmental Impact Assessment (EIA) Compliance Note has been prepared on behalf of Tottenham Hotspur Property Company Limited ('Applicant') and accompanies a Section 73 application to be submitted to the London Borough of Haringey ('LB Haringey') to vary the number of Major Non-associated Football Events at the Tottenham Hotspur Stadium (the 'Stadium').

The NDP permission is a 'Hybrid Consent' ("the Hybrid Consent") which was originally granted on 15 April 2016 (LPA ref. HGY/2015/3000). The Hybrid Consent gave full planning permission for Plots 1, 2 and 3 (The Stadium, The Tottenham Experience and Hotel respectively) and outline planning permission for Plots 4, 5 and 6 (the Extreme Sports Building, the Residential Building and Flexible B1/D1 Space and the Community Health Building respectively). Plots 1 and 2 have been implemented and were completed in 2019.

On 8 April 2024 a S73 application (LPA ref. HGY/2023/2137) in respect of the design, height and maximum floorspace at Plot 3 (Hotel) ("the Hotel S73") was approved. This is hereafter referred to as the 'Consented Scheme'. The Hotel S73 was accompanied by an ES Addendum (the July 2023 ES Addendum').

The Applicant seeks to submit S73 Application to vary Condition B9 of the Consented Scheme to amend the number of non-football related events to be held at the Stadium from 16 per year to 30 per year (further details provided below). This EIA Compliance Note is submitted to accompany the S73 Application, which confirms that additional events at the Stadium will not result in any new or materially different environmental effects to those presented in the ES (as amended).

EIA Context

The Consented Scheme was subject to an Environmental Impact Assessment (EIA), with an Environmental Statement (ES) prepared and submitted in 2015 ('2015 ES').

Following this, amendments to the design of Plot 3 (Hotel) were made in 2023, including changes to massing and floorspaces. An ES Addendum was prepared by Quod and submitted in July 2023 ('July 2023 ES Addendum') to accompany a Section 73 Application (the '2023 S73 Application'). The July

2023 ES Addendum provided further environmental information that appraised the potential environmental effects of the proposed amendments. The residual effects remained almost wholly as presented in the 2015 ES for all technical topics. A minor design change was made following this, in which an ES Addendum Supplementary Note was submitted in October 2023.

The 2015 ES, the July 2023 ES Addendum, ES Addendum Supplementary Note and this EIA Compliance Note together form the ES (as amended) for the purposes of decision making. Particular reference is made to the 2015 ES which included assessments of the Stadium, where the July 2023 ES Addendum was prepared following completion in 2019 and focussed on amendments to Hotel (Plot 3).

Consented Scheme – Non-Football Related Events

Condition B9 of the Hotel S73 restricts the number of non-football related events held at the Stadium with greater than 10,000 visitors to no more than 16 in any one year, with no limits on the number of spectators. The wording of Condition B9 was amended twice through non-material amendments under Section 96a (“S96a”) of the Town and Country Planning Act 1990 (as amended), to lift the restriction on the number of music concerts in the calendar years and 2023 and 2024 (LPA refs. HGY/2023/0823 and HGY/2023/2041).

Condition B9 of the Hotel S73 states that:

“No more than 16 major non-association football events (greater than 10,000 visitors) shall be held per annum in the stadium of which no more than 6 shall be music concerts, and no more than 2 boxing, except during the calendars year 2023 and 2024 where there shall be no limit on the number of music concerts within the overall limit of 16 major non-association football events, subject to there being no more than three consecutive days of concerts and only one week in the year where there are more than three concerts in a single week.”

S73 Application

This S73 Application seeks to vary Condition B9 to increase the number of Major Non-association Football Events (“the event cap”) at the Stadium from 16 to 30 per year with no specific limits on music concerts and continuing with up to two boxing events. It is also proposed to introduce an ‘Intermediate Event’ tier in the S106 to distinguish events which are between 10,000 and 36,000 spectators. This will allow for Intermediate Event management plans to be put in place which are better tailored to this number spectators visiting the stadium. This is expected to involve reduced road closures and bus diversions than a Major Event. The former stadium had a capacity of circa 36,000 spectators and established management plans for that lower capacity and this historical knowledge will help to inform the revised management plans for the Intermediate Event tier. These changes are referred to as the ‘Amendments’ and they relate to Plot 1 only. Condition B9 is proposed to be amended as follows:

“No more than a total of 30 non-association football events exceeding 10,000 visitors shall be held in any calendar year in the stadium, of which there shall be no more than four consecutive non-association football events; no more than five non-association football events in a week; no more than two boxing events in any calendar year; subject to (unless otherwise agreed in writing) there being no

more than two weeks in any calendar year when there are either four consecutive days of non-association football events or five non-association football events in a single week.”

Approach to the Review

The Amendments have been considered in the context of the ES (as amended). This review has ascertained whether any new or materially different significant environmental effects are expected as a result of the Amendments and whether any further environmental information needs to be provided in respect of the Amendments, in line with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ ('EIA Regulations') (as amended)².

The approach to review of assessment of Amendments is as follows:

- Review of baseline conditions, legislation, policy and guidance since the submission of the July 2023 ES Addendum;
- Review of the Amendments to the Consented Scheme;
- Review of committed developments considered within the cumulative assessment; and
- Evaluation of whether the environmental effects pertaining to relevant environmental topics described in the July 2023 ES Addendum remain valid for decision making in light of the Amendments.

Demolition and construction effects are not relevant as the Stadium has been completed and is operational.

Baseline, Legislation, Policy and Guidance Review

Baseline studies and updates were undertaken in for the July 2023 ES Addendum where required. Since submission of planning application for the 2023 S73 Application, there have been no material changes to on-site or off-site conditions at the Site. As such, the baseline studies presented in the July 2023 ES Addendum are considered to remain valid.

A review of relevant legislation, policy and guidance across the topics scoped into the ES Addendum has been undertaken and it is considered that there are no significant changes to legislation or policy that would change the findings of the July 2023 ES Addendum.

On the 5th September 2023, the National Planning Policy Framework³ (NPPF) was updated to amend the policy to assist decision makers dealing with proposals to improve existing renewable energy sites, giving weight to the advantages of doing so. Another amendment related to wind turbine

¹ HMSO, (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The Stationary Office. April 2017.

² HMSO (2018). The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. The Stationary Office. October 2018

³ National Planning Policy Framework (2023).

developments. These changes do not have a bearing on the assessments presented within the July 2023 ES Addendum.

The Levelling Up and Regeneration Act (LURA) received Royal Assent on the 26th October 2023. The LURA includes substantial planning reforms, sets out the framework for the levelling up missions and introduces a range of devolution measures. proposals that would provide ministers with powers to significantly change environmental law through secondary legislation amending or replacing the existing Environmental Impact Assessment (EIA). However, it should be noted that updates to secondary legislation need to come into force to have material implications on the EIA process. As such, the LURA does not have a material bearing on the EIA process undertaken for NDP.

Cumulative Scheme Review

A review of planning applications submitted and approved since July 2023 has been undertaken to establish if additional cumulative schemes have come forward since submission of the 2023 S73 Application, or if the status of the existing cumulative schemes have changed.

Following a data search of the LB Haringey planning portal using the search criteria identified in Chapter 2: EIA Regulatory Framework of the July 2023 ES Addendum, no additional schemes have been identified. The cumulative scheme list remains as presented in the July 2023 ES Addendum.

Review of Technical Assessments

A review of the technical topics assessed within the ES (as amended) has been undertaken in light of the Amendments and is provided in Table 1. The validity of reported residual effects has been confirmed, with relevant mitigation measures listed. More context has been provided for the technical topics of transport and noise and vibration.



Topic	Discussion
Archaeology, Ground Conditions and Hydrogeology, Water Resources and Flood Risk and Ecology	There is no material change in the building footprint covered by the Development to that assessed through the Consented Scheme. There is no material change in the overarching drainage strategy of the Consented Scheme. There is no material change in the overarching landscape strategy of the Consented Scheme. The Amendments would not change the conclusions of the July 2023 ES Addendum. Therefore, the conclusions stated in the ES (as amended) remains valid and no further assessment is provided in this EIA Compliance Letter.
Cultural Heritage, Townscape and Visual, Wind Microclimate, Daylight, Sunlight and Overshadowing	The Amendments do not affect the height, massing or appearance of any of the Consented Scheme Plots. Therefore, the conclusions stated in the ES (as amended) remains valid and no further assessment is provided in this EIA Compliance Letter.
Socio-economics	The Amendments do not alter the unit/tenure mix or the play space strategy of the Consented Scheme. The only effect which the Amendments for consideration is the additional spending which will be increased due to increased visitors to the Stadium throughout the year. However, the 2015 ES reported a major beneficial effect associated with this, which is the largest scale of effect within the assessment matrix. The Planning Statement which accompanies this S73 Application provides details on additional socio-economics benefits that new events will bring. This includes complimentary tickets and provision of a priority ticket window to local residents and a community grant scheme in which profits to tickets will go towards causes within the local area. Therefore, the conclusions stated in the ES (as amended) remains valid and no further assessment is provided in this EIA Compliance Letter.
Air Quality	There are no proposed changes to the maximum quantum of floorspace, type or mix of land uses; therefore, there will be no change in the traffic flows generated by the Amendments. Proposed vehicle routing remains as previously assessed. The Amendments would not change the conclusions of the ES (as amended). Therefore, the conclusions stated in the ES (as amended) remains valid and no further assessment is provided in this EIA Compliance Letter.



Topic	Discussion
Traffic and Transport	Summary of 2015 ES Assessment Chapter 15: Traffic and Transport was accompanied by two Transport Assessments: ▪ Non-Major Event Day Transport Assessment and Travel Plan (2015); and ▪ Major Event Day Transport Assessment and Travel Plan (2015). For non-football related events, the assumptions on the forecasted number of visitors was generated and analysed using the same tools as the match-day scenarios. The key assumptions were: ▪ Venue capacity of 45,000 or 55,000, depending on the layout of the concert; ▪ The concert will take place on a Saturday evening; and ▪ The main act will take the stage at 8:00 PM and finish at 10:00 PM with no supporting acts. Assessments on the effects of the additional visitors on surrounding public transport receptors were undertaken. Reported Effects Within the 2015 ES, traffic and transport effects associated with the Stadium were reported as follows: ▪ Event Day Road Closures – neutral effect (not significant); and ▪ Additional Queues at Rail Stations and Underground Stations (Event Days) – minor adverse effect (not significant). The assessments concluded that the train station capacities would not be exceeded for arrivals for either of the two scenarios for the Stadium capacity. For departures, it was forecast that there would be queues for attendees travelling southbound from Northumberland Park Station. In neither of the two capacity scenarios did any of the capacity constraints translate into a risk to safety or station operations. Updates to Legislation, Policy and Guidance Since preparation of the 2015 ES, the Mayor's Transport Strategy was published in 2018, with a supplementary proposal added in November 2022. This set out the Mayor's policies and proposals to reshape transport in London over the next two decades. The addition of this has no material change to the scope, approach and conclusions of the transport assessment undertaken and presented within the 2015 ES. Mitigation, Monitoring and Licensing The mitigation and monitoring proposed within the 2015 ES relating to concert events comprised crowd management, to form an extension of the existing plan in place to deal with pre- and post-match conditions at



Topic	Discussion
	football matches. The management requirements associated with the staging of concerts are different to those associated with football matches, as the behaviour of visitors is likely to differ. Scheduling of concerts at the Stadium requires a separate licensing process which is triggered by a proposed event curfew being after 22:00. Since completion of the Stadium, a number of non-football association events have been undertaken, in accordance with the limits as agreed by LB Haringey. Since the Hybrid Consent, improvements to the public transport network have taken place in the vicinity of the Site, including ▪ The completion of the Victoria Line upgrade, which provided faster and high frequency trains. A new timetable was also implemented in 2016 which included all trains running to Walthamstow Central via Tottenham Hale thereby increasing the capacity at Tottenham Hale. ▪ Upgrades to White Hart Lane to make it part of the London Overground network. This included new rolling stock from 2018 consequently increasing the capacity. The station was also remodelled to provide better connectivity and improve platform loading ▪ Upgrade of Tottenham Hale station and bus interchange, and improvements to the pedestrian environment resulting from the removal of the Gyratory and the introduction of the Green Link has enhanced Tottenham Hale as an alternative to Seven Sisters station. Schedule Four of the S.106 Agreement also requires the submission of a number of management plans to mitigate against the impact of the new Stadium and the number of events. It differentiates between Major Events (those attended by 10,000 or more spectators excluding staff) and Minor Events (those attended by fewer than 10,000 spectators excluding staff). Of note is the annual review and submission of the Major Event Day Local Area Management Plan (“the LAMP”). This plan is required to mitigate adverse environmental impacts and nuisance to residents. It covers all aspects relating to event management including travel, parking and access arrangements, signage, safety and security, waste collection, event facilities including public conveniences, lighting and noise control. The LAMP is subject to annual review, which is informed by independent monitoring but in practice it is reviewed and amended more frequently, particularly for MNFEs which can vary in characteristics and audience profiles.



Topic	Discussion
	The operation of the Stadium and the LAMP is articulated in a booklet (the 'Blue Book') which was distributed to 50,000 addresses around the Stadium prior to its opening. The Blue Book will be subject to its first major revisions and reissued once the revised LAMP has been approved by the Council. For each of the non-football association events, Bespoke Transport Plans are prepared and submitted to LB Haringey for approval. The Bespoke Transport Plans are prepared by THFC in conjunction with the event promoters to agree key assumptions for the assessments. The content of the Bespoke Transport Plans typically includes relevant information on the event, forecasted travel demands, relevant information from postcode analysis of general ticket transactions and GIS analysis for events. As non-football association events have been undertaken on the Site since completion of the Stadium, THFC have sufficient knowledge and experience to identify precedents from events to inform Travel Demand Management measures to be implemented. This knowledge relates to the day of the week, the finish times and train service disruptions due to both Network Rail engineering works, staff and driver shortages and trade union industrial actions. For future events at the Stadium, Bespoke Transport Plans will be submitted for approval to LB Haringey in advance of the events. Conclusion The increase in non-football association events from 16 to 30 per year will not result in new or materially different effects as reported within the 2015 ES. The existing mitigation and monitoring measures have resulted in successful concert events at the stadium, with no safety concerns. These measures will be employed for all future events as per the licensing process in agreement with LB Haringey.
Noise and Vibration	Summary of 2015 ES Assessment Chapter 13: Noise and Vibration assessed non-football match stadium event noise. The assessment stated that events involving high powered amplification are regularly held in sporting stadia, arenas, open air sites and within lightweight buildings all over the UK. Within this assessment, the number of events were assumed to include up to six music concerts and up to ten major sporting events of which at least two will be National Football League (NFL) games (i.e. American football). Noise break-out from the non-football events within the stadium will depend upon a number of factors but of particular significance can be the placement of the stage and



Topic	Discussion
	the orientation of the loudspeaker systems in relation to that. For this reason, detailed acoustic modelling was undertaken to predict the noise levels from such events. The assessment assumed that the events would conclude by 23:00 hours. The assessment referred to appropriate guidance to confirm that the music noise level (MNL) should not exceed an absolute level 75 dB(A) over a 15 minute period or a background noise level by more than 15 dB(A) over a 15 minute period. Reported Effects Within the 2015 ES, noise and vibration effects associated with the Stadium were reported as follows: ▪ Music Concert Noise – the predicted Music Noise Levels at the existing receptors meet the criterion of the 75db(a) level over a 15 minute period. Therefore no mitigation measures were required and this resulted in a direct, temporary negligible – minor effect (not significant). Updates to Legislation, Policy and Guidance No changes to legislation, policy and guidance are relevant to the assessment of event noise as presented in the 2015 ES. Mitigation and Monitoring No mitigation was proposed within the 2015 ES, as the predicted music event noise levels at the existing receptors comfortably met the noise limits as required by guidance. A series of noise monitoring is undertaken during each non-football association event at the sensitive receptor locations to ensure that the previously predicted noise levels are valid. Throughout the music events at the stadium, it has been found that the acoustic design of the Stadium is better than anticipated. The monitored noise data show that sensitive receptor locations are comfortably below the 75 dB criteria for Live Music events. Notwithstanding the above, it was recommended that residents are notified prior to any non-football events such that they can anticipate an increase in noise level for a short period. Conclusion The increase in non-football association events from 16 to 30 per year will not result in new or materially different effects as reported within the 2015 ES. The Amendments do not change the type or level of noise from non-football events at the Stadium. The noisiest non-football events are music events. The 2015 ES reported that music events would have negligible to minor



Topic	Discussion
	significant adverse noise effects. This assessment was undertaken before concerts had taken place at the Stadium, with the knowledge that the design and construction of the stadium would be specifically adapted so that the breakout of noise from within was mitigated and minimised (as planning policy requires). Since the stadium began operation, it has been found that the noise mitigation measures are more effective than envisaged at the design stage, where a precautionary approach was applied. The existing noise monitoring undertaken during music events has proved that there have been no exceedances of the absolute limit of 75 dB(A). Consequently, the noise from music events affecting the local communities around the Stadium has been found to be substantially lower than anticipated. This is reflected in the very low number of noise complaints regarding music events, with despite several major international artist performing to sellout crowds in 2022 and 2023, at events on consecutive days and successive weekends only 3 noise complaints have been reported. The predicted degree of noise from a music event at the stadium was a primary factor in judging how many such events could be permitted. Noise from music events has been found to be lower than anticipated when the current permission was granted with the existing restriction on the number of non-football event days in place. Therefore, the number of days that non-football events could take place could be increased from 16 to 30 events per year, without worsening the impact from negligible to minor adverse effects as reported in the 2015 ES.
Electronic Interference	The implemented mitigation strategy associated with the Consented Scheme was completed after granting of the 2016 permission for any potentially affected properties at the time and the majority of residential properties in the local area are now expected to utilise streaming based services. The Amendments do not change this and therefore, the ES (as amended) remains valid and no further assessment is provided in this EIA Compliance Letter.

Conclusions

The Amendments to the Consented Scheme have been appraised for relevant technical topics. The Amendments are not considered to be substantive and updated assessments have concluded that the ES (as amended) remains valid for decision making and no further environmental information is required.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A Webb', with a stylized, cursive script.

Aisling Webb
Director



Annex 1: Links to Previous ES

Document Title	LB Haringey Planning Reference	Available At
2015 ES	HGY/2015/3000	https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000002GB1NAAW/hgy20153000?c__r=Arcus_BE_Public_Register&tabset-3892f=3
July 2023 ES Addendum	HGY/2023/2137	https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005U2qUAAS/hgy20232137?c__r=Arcus_BE_Public_Register&tabset-3892f=3
ES Addendum Supplementary Note	HGY/2023/2137	https://publicregister.haringey.gov.uk/pr/s/planning-application/a0i8d000005U2qUAAS/hgy20232137?c__r=Arcus_BE_Public_Register&tabset-3892f=3