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Northumberland Development Project - Events

S73 Application

Planning Statement

APRIL 2024

Q240028

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1 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Tottenham Hotspur Property Company Ltd (“THFC”) (“the Applicant” or “the Club”) in support of an application for minor material amendments to the London Borough of Haringey (“LBH”) made under Section 73 (“S73”) (“S73 Application”) of the Town and Country Planning Act 1990 (as amended), to vary the number of Major Non-association Football Events (“MNFE”) at the Tottenham Hotspur Stadium (“the Stadium”) as set out in Condition B9 attached to the Northumberland Development Project (“NDP”) (“the Site”) planning permission (LPA ref. HGY/2023/2137).
- 1.2 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. Plot 3 (Hotel) has also been implemented, albeit to ground level only.
- 1.3 On 8 April 2024 a S73 application (LPA ref. HGY/2023/2137) to vary Conditions A4 (Consented Drawings and Documents) and Condition A7 (Maximum Quantity/Density) in respect of the design, height and maximum floorspace at Plot 3 (Hotel) (“the Hotel S73”) was approved. The permission was subject to a Deed of Variation to the original Section 106 (“S.106”) Agreement.
- 1.4 Condition B9 attached to the Hotel S73 permission restricts the number of MNFE (greater than 10,000 visitors) to be held at the Stadium to no more than 16 in any one year, with no limits on the number of spectators. The wording of the events condition has been 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) (“the 2023 NMAs”).
- 1.5 This S73 Application seeks to vary Condition B9 to increase the number of MNFE permanently, at the Stadium from 16 to 30 per year continuing with up to two boxing events and limits on the number of concerts being held consecutively (the “Events S73”). The description of development is as follows:

“Application under Section 73 of the Town and Country Planning Act for the variation to Condition B9 (Major Non-association Football Events) of the hybrid planning permission HGY/2023/2137 (as amended) for amendments to allow up to 30 major non-association football events including music concerts and other associated changes”

- 1.6 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.”

- 1.7 As detailed later within this statement, to support THFC's ability to continue attracting the highest calibre artists to Tottenham with the associated greater socio-economic benefits to the local economy, the Club seeks to increase the number of events at the Stadium. Allowing greater flexibility in terms of the amount of events is crucial to enhance the Stadium's role as a multi purpose and renowned music venue in London. The Stadium has become a prominent venue in London's cultural and music landscape and hosting music concerts and other major events has become an important function of the Stadium, but it must be given flexibility to compete in an increasingly competitive market for globally significant artists and events.
- 1.8 This Planning Statement explains the Proposed Amendments in the S73 Application and considers the acceptability of them in the context of planning policy and other relevant material considerations. It is structured as follows:
- **Section 2** – sets out the site description, planning history and planning background
 - **Section 3** – describes the proposed amendments and the associated benefits;
 - **Section 4** – describes the pre-application consultation that has been undertaken
 - **Section 5** – sets out the relevant planning policy context
 - **Section 6** – considers the principle of the application proposals
 - **Section 7**– provides a summary and conclusions

Planning Application Documents and Drawings

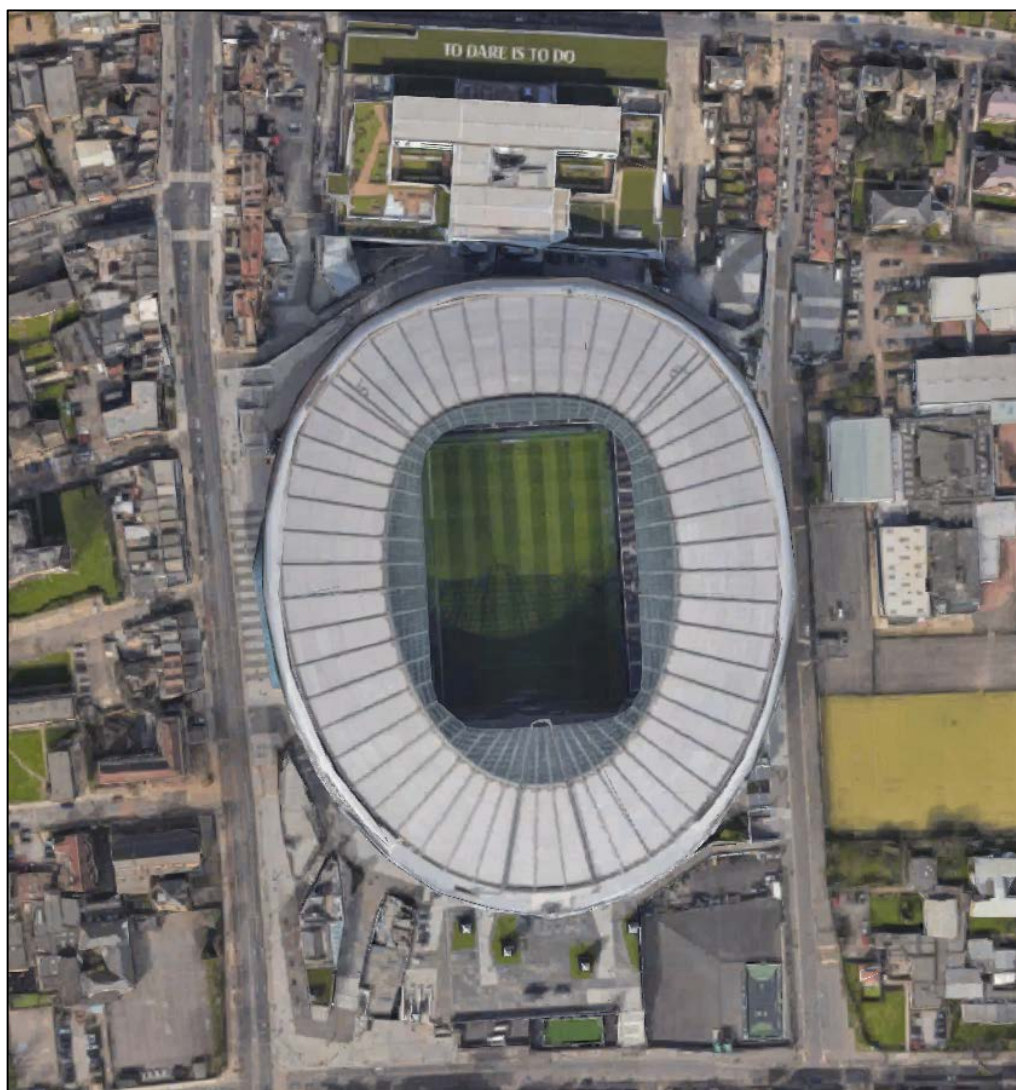
- 1.9 This Planning Statement is also supported by an Environmental Impact Assessment Compliance Note which confirms that additional events at the Stadium will not result in any new or materially different environmental effects to those previously assessed.
- 1.10 The red line planning application boundary for this S73 Application remains the same as that of the Hybrid Consent.

2 Relevant Planning Background

Site and Surroundings

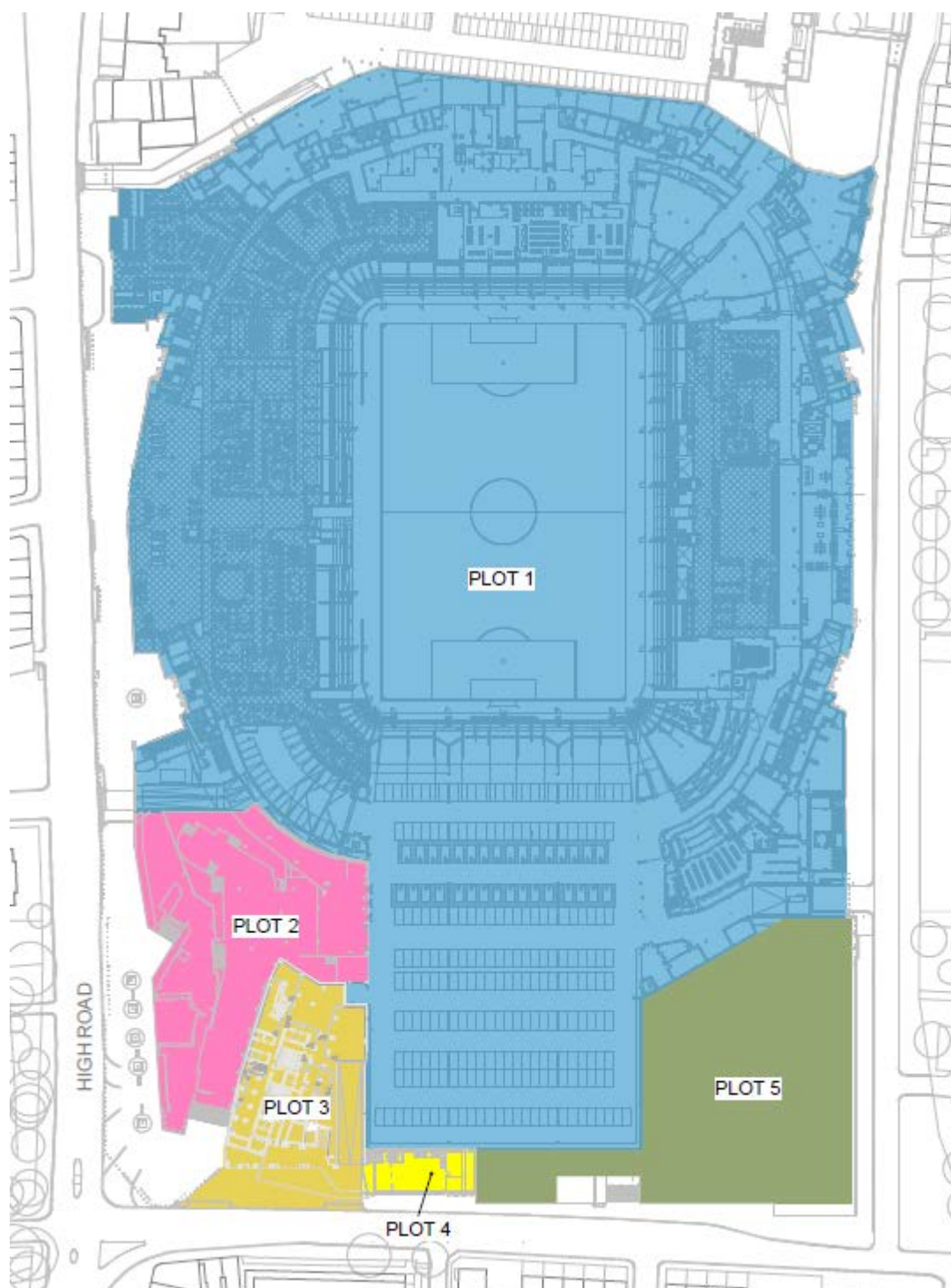
- 2.1 THFC Stadium is primarily a football stadium that is also capable of staging various sports and other forms of entertainment. It forms part of the ongoing phased redevelopment of the Site as approved by the Hybrid Consent known as the Northumberland Development Project or 'NDP'. It is bounded to the north by Lilywhite House, which comprises a Sainsbury's superstore and Gym Group, the London Academy of Excellence Tottenham and the Club's offices; Worcester Avenue to the east; the Tottenham Experience (Plot 2) to the south west; two temporary five a-side football pitches, events space and Park Lane to the south; and Tottenham High Road to the west.

Figure 1: Site Location



- 2.2 Tottenham Hotspur Stadium is located within Plot 1 and comprises the stadium building itself and the northern podium. The location of the plots approved under the Hybrid Consent is illustrated in Figure 2 below.

Figure 2: Plot Location



- 2.3 The Site is highly accessible with a PTAL rating of 3-5. It is a six minute walk to White Hart Lane Overground Station to the west; a ten minute walk to Northumberland Park Rail Station to the east and also within walking distance of various bus stops.
- 2.4 During operation, the Stadium is supported by four stations (White Hart Lane, Northumberland Park, Tottenham Hale and Seven Sisters) with shuttle bus services connecting a further two (Wood Green and Alexandra Palace stations). Certain local roads (including the High Road)

are closed for a period prior, during and after a major event and there is also a “Major Event Day” Controlled Parking Zone (‘CPZ’) in operation.

- 2.5 The Site is located in Flood Zone 1 and partially located within Flood Zone 2.
- 2.6 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), located to the west of the Site which has been incorporated into the Tottenham Hotspur Experience building. Other listed buildings located near the site include 790 (Dial House), 792, 794, 796 (Percy House), 798-802, 808 & 810 High Road. 732 High Road (Beavertown Corner Pin pub) is locally listed and located opposite the Site.

Planning History

- 2.7 As outlined in the previous section, the Site forms part of the ongoing phased redevelopment of the NDP for which the Hybrid Consent was originally approved in 2016 (ref. HGY/2015/3000). The Hybrid Consent granted planning permission for the following development:

“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).”

- 2.8 This permission was subject to a S73 application (LPA ref. HGY/2023/2137) to vary Conditions A4 (Consented Drawings and Documents) and Condition A7 (Maximum Quantity/Density) in respect of the design, height and maximum floorspace at Plot 3 (the Hotel). On 11 December 2023, Haringey’s planning committee resolved to grant planning permission for the Hotel S73. The approval was issued on 8 April 2024.
- 2.9 The original Hybrid Consent (LPA ref. HGY/2015/3000) was subject to an Environmental Impact Assessment (EIA). An Environmental Statement (ES) (“the 2015 ES”) supported the application which covered a wide range of technical topics as summarised in Table 1. The Plot 3 S73 in respect of changes to the hotel was accompanied by an ES Addendum (“the 2023 ES Addendum”) which provided further environmental information that appraised the potential environmental effects of the proposed amendments to Plot 3. The 2023 ES Addendum comprised both qualitative and quantitative re-assessment of the technical topics as listed in Table 1. The 2023 ES Addendum concluded that residual effects proposed for the hotel remained as presented within the 2015 ES for all technical topics with the exception of changes in available daylight and sunlight to some neighbouring properties, betterment in wind microclimate effects and townscape and visual amenity changes for six viewpoints. Due to

updates to the Town and Country Planning (Environmental Impact Assessment) regulations 2017, an additional technical topic of Climate Change and Greenhouse Gas Emissions was assessed.

Table 1: Topics Assessed in the 2015 ES and the 2023 ES Addendum

Topic	Scope of 2015 Environmental Statement	Scope of 2023 ES Addendum
Air Quality	ES Chapter	Statement of Conformity
Archaeology	ES Chapter	Statement of Conformity
Cultural Heritage	ES Chapter	Statement of Conformity
Daylight and Sunlight	ES Chapter	ES Addendum Chapter
Ecology	ES Chapter	Statement of Conformity
Electromagnetic Interference	ES Chapter	Statement of Conformity
Flood Risk and Surface Water Drainage	ES Chapter	Statement of Conformity
Ground Conditions and Hydrogeology	ES Chapter	Statement of Conformity
Noise and Vibration	ES Chapter	Statement of Conformity
Socio-economics	ES Chapter	Statement of Conformity
Townscape and Visual Amenity	ES Chapter	ES Addendum Chapter
Traffic and Transport	ES Chapter	Statement of Conformity
Wind Microclimate	ES Chapter	ES Addendum Chapter
Climate Change and Greenhouse Gas Emissions	Not included/required	New ES Chapter

2.10 The assessments and mitigation packages as set out in the 2015 ES in relation to transport, noise and socio-economics are summarised below.

Transport

2.11 Chapter 15 (Traffic and Transport) in the 2015 ES was accompanied by two Transport Assessments – one for major event days and one for non-major event days. These assessments found no significant effects as a result of event day road closures and a minor adverse effect in terms of additional queues at stations.

2.12 The mitigation and monitoring proposed within the 2015 ES relating to MNFE comprises of crowd management; the submission of Bespoke Transport Plans for each MNFE; and the implementation of Travel Demand Management measures.

2.13 The Bespoke Transport Plans are prepared by THFC in conjunction with the event promoters to agree key assumptions for the assessments and are submitted to LBH for approval. 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. For future events at the Stadium, Bespoke Transport Plans will be submitted for approval to LB Haringey in advance of the events (as required by Condition 6 of the Stadium Premises Licence).

2.14 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) and includes:

- Major Event Day Local Area Management Plan ('LAMP')
- Major Event Day Stadium Development Travel Plan
- Minor Day Event Stadium Development Travel Plan
- Stadium Development and Servicing Plan
- Stadium Development Coach Strategy
- Major Event Day Monitoring Programme
- Shuttle Bus Service
- Stadium Development Cycling Strategy
- Attraction of Visitors Measures, the Retentions of Visitors Measures and the Transport and Communications Strategy
- THFC Football Strategy Season Tickets and Other Major Event Day Tickets for Local People

2.15 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.

2.16 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.

2.17 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.

Noise

2.18 Chapter 13 (Noise) assessed noise arising from MNFEs. It found that the predicted Music Noise Levels at the existing receptors met the criterion of the 75db(a) level over a 15 minute period. Because of this, no mitigation measures were required.

- 2.19 A series of noise monitoring is undertaken during each MNFE at the sensitive receptor locations to ensure that the previously predicted noise levels are valid. Since the Stadium opened and has held noise generating events such as music concerts, 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.

Socio-economics

- 2.20 Chapter 14 (Socio-economics) assessed the socio-economic effects such as employment creation, spending generation and effects arising from a new resident population. It was concluded that the development would result in major beneficial effects.

Condition B9 (formerly B16)

- 2.21 Condition B16 attached to the original Hybrid Consent restricted the number of non-football related events (greater than 10,000 visitors) to be held at THFC Stadium to no more than 16 in any one year, with no limits on the number of spectators. It was originally approved with the following wording:

“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.”

- 2.22 On 6 July 2023, LBH approved a non-material amendment (“NMA”) application to vary Condition B16 of the Hybrid Permission to remove the annual limit of 6 music concerts within the 16 major non-football event cap for the 2023 calendar year (LPA ref. HGY/2023/0823) (“the July 2023 NMA”). A second NMA application was then approved on 4 October 2023 to include reference to the 2024 calendar year (LPA ref. HGY/2023/2041) (“the October 2023 NMA”). As such, Condition B9 currently reads as follows:

“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.”

- 2.23 The above NMA applications sought to provide more flexibility between MNFE for 2023 and 2024. The main reason for this was due to the Covid-19 pandemic which heavily impacted leisure industry as no concert or non-concert major events were held at the Stadium during 2020, which led to a higher demand for venues in the following years. To ensure the Stadium could host the right number and mix of events to support a commercial recovery from the impacts of Covid-19 pandemic, Condition B16 was amended.

- 2.24 LBH Officers found that the large scale and nature of the NDP permission and thereby the associated mitigation and safeguarding conditions and obligations would be effective enough to manage the additional concert events. Officers specifically noted in their Delegated Report for the October 2023 NMA that they were satisfied that the impacts would be managed:

“Officers are satisfied that concert events have not differed significantly in terms of local impact to any other Major Event, as defined in the planning permission. Following discussions with

the Local Planning Authority and local consultation and stakeholder engagement, the Club also committed to maintaining current actions and initiatives and delivering, where possible further measures to mitigate the impact of concert events on the local area."

History of the Stadium

2.25 As set out in the Hybrid Consent, the requirement for a new stadium to replace the original stadium, White Hart Lane which was the home of THFC since 1899, was due to numerous factors including the need to maximise the regeneration potential of the development and expand the multi-use nature of the Stadium.

2.26 Prior to the redevelopment of the Stadium site, the Tottenham riots in 2011 placed a greater focus on Tottenham amongst central, regional and local government, and Wards within Tottenham were and still are amongst, one of the most deprived in London¹. North Tottenham in particular is the most deprived area within the LBH.

2.27 In response to this, the Site was promoted for sport led regeneration as part of the wider regeneration aspirations for the area as noted in the development plan and associated non statutory regeneration and planning frameworks. It was recognised by Haringey as a symbol of investment through new levels of employment, increased leisure tourism and business activity, encouraging other developers to commit to investing in redevelopment in the area.

2.28 LBH Officers in particular noted in their report to committee for the Hybrid Consent that the redevelopment of the Stadium would act as a catalyst for wider regeneration:

"The regeneration of the Site is also a key contributor to the growth of Tottenham and will be a key to allowing for improvements to the physical, social and economic status of the area."

2.29 The proposals for the new Stadium were driven by the need to create a better more viable scheme that accommodates a greater range of uses throughout the year including additional activities such as concerts, other sports and community events. The old stadium, White Hart Lane, had a seating capacity of 36,300 seats and held a number of major events since it opened in 1899. The new Stadium now has a seating capacity of 62,850 which has enabled more THFC fans and visitors to watch football matches as well as allow the Stadium to operate as a multi purpose venue by hosting a number of third-party events, including NFL games, boxing matches, and concerts, bringing expenditure outside of matchdays, further boosting the local economy and increasing revenue.

2.30 Since the Stadium opened in 2019, a total of 128 major events have been held. In 2021 and 2022, the Stadium welcomed 1.6 million visitors and hosted 34 matches and events including: four concerts; three rugby matches; two NFL games; and one boxing match. In the following year in 2023, the Stadium hosted five concerts for Beyoncé's world tour from 29 May to 4 June and another two concerts in July.

¹ English Indices of Multiple Deprivation 2019; <https://data.london.gov.uk/blog/indices-of-deprivation-2019-initial-analysis/>

- 2.31 Officers noted in their report to committee for the Hybrid Consent the delivery of the 61,000 seat stadium would be capable of hosting a variety of major sporting and non-sporting events, attracting a significant number of additional visitors to the area – some 700,000 visits per year, which would help contribute to locally spending.
- 2.32 By developing the Stadium as a multi-purpose venue, THFC has been able to contribute a significant amount of GVA and jobs to the local and wider community. The environment surrounding the Stadium site is also being redeveloped. Sites being redeveloped by the Applicant include the developments at The Goods Yard and The Depot, Printworks, Paxton17 and the Hotel within the Stadium site itself which recently received permission for a taller building that better responds to the character and legibility of the area.
- 2.33 Furthermore, since the Hybrid Consent was granted, significant improvements to the public transport network have taken place in the vicinity of the Site, including:
- The closest station to the Stadium, White Hart Lane, was completely redeveloped at a cost of £18m and reopened in 2019. The station is a six-minute walk from the Stadium campus and then a three-minute connection on London Overground to the Victoria line at Seven Sisters. The station was remodelled to provide better connectivity and improve platform loading. Brand new air conditioned and wi-fi enabled rolling stock was introduced on the line in 2020, which runs between Liverpool Street and Enfield Town/Cheshunt.
 - The second closest station, Northumberland Park, was completely redeveloped as part of the wider £170m upgrade of the West Anglia Route and reopened in 2019. The station is a ten-minute walk and then a four-minute connection to the Victoria line at Tottenham Hale. The station is served by Greater Anglia services connecting Stratford/Liverpool Street with Hertford East/Bishop's Stortford.
 - The third closest station, Tottenham Hale has also been completely redeveloped as part of the West Anglia Route upgrade and reopened in 2022. Tottenham Hale is a 25-minute walk and now a major interchange providing a hub for London Underground, Greater Anglia and Stansted Express services as well as numerous bus services. Tottenham Hale itself is now a successfully established regeneration scheme providing housing, shopping and leisure services. 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.
 - The fourth closest station, Seven Sisters provides a connection between London Underground and Overground services. The station is a 30-minute walk but also the principal public transport hub on football matchdays and other major events because of the speed and frequency of the Victoria line. King's Cross St Pancras is an 8-minute connection and the West End via Oxford Circus, only 12 minutes. Following the last upgrade in 2016, the Victoria line is the highest frequency and most reliable line on the London Underground network providing 33 trains per hour during peak periods.
 - These services connect with the Elizabeth line at Liverpool Street. The £19bn line opened in 2022 and connects Heathrow/Reading and Shenfield/Abby Wood via high frequency, state-of-the-art rolling stock.

- The Mayor of London's Cycling Super Highway 1 (CS1) which competed in 2016. This provides better north/south cycling connectivity to the new Stadium which is located at its planned northern terminus.

2.34 The event restrictions set out in Condition B9 limits THFC's growth plans and the ability to drive greater socio-economic benefits to the local economy. Allowing greater flexibility in terms of the number of events is crucial to enhance the Stadium's role as a multi-purpose and renowned music venue in London. The Stadium has already become a prominent venue in London's cultural and music landscape and hosting music concerts and other major events has become an important function of the Stadium, but it must be given flexibility to grow. It is within this context that the Club is applying to increase the number of MNFE at the Stadium from 16 to 30 per year. This requires Condition B9 of planning permission LPA ref: HGY/2023/2137 to be amended in the manner described in the next section.

3 Proposed Amendments

- 3.1 This application proposes to amend Condition B9 attached to the Hotel S73 Consent (LPA ref. HGY/2023/2137) pursuant to S73 of the Town and Country Planning Act 1990 (as amended). The description of development is as follows:

“Application under Section 73 of the Town and Country Planning Act for the variation to Condition B9 (Major Non-association Football Events) the hybrid planning permission HGY/2023/2137 (as amended) for amendments to allow up to 30 major non-association football events including music concerts and other associated changes.”

National Guidance on Amendments to Conditions

- 3.2 National Planning Practice Guidance (“NPPG”) (paragraph 013 Reference ID: 17a-013-20230726) states that:

“In contrast to section 96A, an application made under section 73 of the Town and Country Planning Act 1990 can be used to make a material amendment by varying or removing conditions associated with a planning permission. There is no statutory limit on the degree of change permissible to conditions under s73, but the change must only relate to conditions and not to the operative part of the permission.

Provisions relating to statutory consultation and publicity do not apply. However, local planning authorities have discretion to consider whether the scale or nature of the change warrants consultation, in which case the authority can choose how to inform interested parties..”

- 3.3 The NPPG explains (ID17a-015-20140306) that a decision notice describing the new permission should clearly express that it is made under section 73. It should set out all of the conditions imposed on the new permission, and, for the purpose of clarity restate the conditions imposed on earlier permissions that continue to have effect.
- 3.4 The NPPG goes onto state (ID: 21a-040-20190723) that the original planning permission will continue to exist whatever the outcome of the application under section 73. The conditions imposed on the original permission still have effect unless they have been discharged.
- 3.5 The Proposed Amendments do not seek to alter the Hybrid Consent description of development nor the approved red line boundary of the Site.

Proposed Amendments to Condition B9

- 3.6 The Proposed Amendments to Condition B9 would allow the use of the Stadium, on a permanent basis, for up to 14 additional MNFE. These would be in addition to the football events and the 16 MNFE currently allowed per calendar year.
- 3.7 The condition is proposed to be amended to read 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.”

- 3.8 The revised wording removes reference to the limits within the calendar years 2023 and 2024 as this is no longer relevant and reflects THFC’s willingness to commit to:
- the application of the following restrictions to events exceeding 10,000 visitors non-association football events;
 - a permanent cap on the number of boxing events, with no more than two in a calendar year
 - a permanent cap on the number of consecutive non-association football events, with no more than four in a row;
 - a permanent cap on the number of non-association football events per week, with no more than five in one week; and
 - unless agreed in writing with the Local Planning Authority, no more than two weeks in any calendar year where there are either four consecutive non-association football events in a week or five non-association football events in a week (to prevent the theoretical ability to stage all 30 events over a 6 week period).
- 3.9 The additional events will be managed in accordance with the arrangements already used for other major events. Reliance will be made on well-established management plans which already operate successfully for current events.
- 3.10 There is also an opportunity to introduce an ‘Intermediate Event’ tier in the S106 in order to additionally distinguish between events that have between 10,001 and 36,500 spectators. This could allow for more tailored management plans to be put in place for the number of spectators visiting the stadium. This approach would need to be trialled in consultation with the relevant authorities for intermediate events (between 10,001 and 36,500 spectators) and then, if successful, management arrangements could be confirmed in a new corresponding category of LAMP. Potential differences between the ‘Major Event LAMP’ overlay and an ‘Intermediate LAMP’ overlay could be a reduction in road closure durations to 1hr pre, during and 30mins post (i.e. 1.5hr reduction overall) and a target of reducing the post-major event closure period of White Hart Lane from 30mins to 15mins. If agreed, measures of this kind could help to reduce the amount of disruption associated with an intermediate sized event.
- 3.11 The approach to amending the Hybrid Consent and principle of additional events has been discussed and agreed with LBH.
- 3.12 This application recognises changes in planning policy and guidance since the original Hybrid Consent was granted.

Rationale for Proposed Amendment

- 3.13 The amendment to Condition B9 is sought to allow the Club greater flexibility and choice to host more events. Since it has opened, the Stadium has become a prominent venue in London's cultural and music landscape and hosting music concerts and other large events has become a key function of the Stadium's success. The amendment to Condition B9 is sought to enhance the programme of events at the Stadium and meet demand for concert space to attract a wider range of artists.
- 3.14 It is important to note the Club does not envisage hosting 30 events every year, not least as its ability to do so is partly dependent upon the number of football matches being played. The amendment is therefore sought to provide the Club with flexibility to do so. This approach to provide flexibility has been demonstrated in the 2023 NMAs. For example, the Stadium will be a host venue for the UEFA European Football Championships in 2028 (bringing an international football tournament to N17 for the first time) and the Club would like the option of hosting additional events ahead of the tournament, welcoming fans from across Europe. The programme of events at this time is unknown and so flexibility on the amount of events is required.
- 3.15 Allowing additional events will enhance the Stadium's role as a multi purpose and renowned music venue but most importantly it will result in additional socio-economic benefits for the local community and the city as a whole. The Socio-Economic Report that has been submitted in support of this application provides an analysis of the Club's contribution to the local area and the tri-borough area (London Boroughs of Haringey, Enfield and Waltham Forest). This explains that THFC makes a significant contribution to the economy of the tri-borough area. In 2021/22, it made a £344 million Gross Value Added ("GVA") contribution through the hosting of football matches and other events at the Stadium. Increasing the number of events will therefore increase this figure and value to the surrounding boroughs. This is expected to nearly double to £585 million GVA for the 2026/27 season. In the Borough itself, GVA was £296 million in 2021/22 and this is estimated to grow to £549 million in 2026/27.
- 3.16 The GVA contribution in 2021/22 was driven by the 1.6 million people visiting the Stadium with spending on accommodation, food, drink and other ancillary items within the local area, thereby benefiting a significant number of local businesses. Music concerts in particular typically attract first-time visitors and visitors from across the UK and abroad. Increasing the number of events will consequentially increase footfall and the number of visitors specifically long distance domestic and international visitors, resulting in longer trip durations and dwell times, more overnight stays and linked trips.
- 3.17 This, in combination with the employment at the Club, has resulted in over 3,700 jobs in the tri borough area (of which 2,800 jobs were provided in the LBH). The uplift in events will create additional employment opportunities such as event day steward and catering positions. For 2026/27, it is estimated the total number of jobs will increase to 4,300. The Stadium is a key employer and pays London Living Wage to all full-time staff.
- 3.18 Hosting additional world class music events will allow the Club to offer a greater variety of artists, and this alongside the football matches, NFL games and rugby matches as well as the community events enables the Club to deliver a unique offer that provides socioeconomic benefits to the tri-borough area that it would not otherwise be able to.

- 3.19 In terms of direct benefits for the local community, the Club will continue to retain the popular community ticketing scheme for non-association football events. This ensures residents and community groups continue to have the opportunity to apply for complimentary tickets.
- 3.20 The Club will also introduce a 24hr priority ticket window, enabling local residents and neighbours to be amongst the first to purchase tickets at face value before they go on sale to the general public. This will ensure local residents do not miss out on sell-out events.
- 3.21 A new community grant scheme will also be introduced through financial contributions from every additional non-association football event held over the currently approved 16 events. The grant scheme will be administered by the Club but in close consultation with the local community and Elected Members to ensure that the funds generated are directed to worthy local causes.
- 3.22 The proposed changes will also enable THFC to support Haringey's London Borough of Culture in 2027. The Stadium is planned to host the final event and will provide a unique opportunity to host the finale which will showcase homegrown Haringey talent. In doing so this will have a lasting positive impact on the Borough and the local community.
- 3.23 In summary, there is a clear rationale for the proposed amendments and a number of socio-economic benefits to the local community and area will arise as a result.

4 Consultation

- 4.1 On the recommendations of the Safety Advisory Group (“SAG”), which comprises blue light services, the Sports Ground Safety Authority (SGSA) and transport operators, the Local Authority issues a safety certificate for the staging of events at the Stadium. This process is unaffected by these proposals and will continue to ensure close co-operation between the Club and its operational stakeholders.
- 4.2 The SAG meets at the discretion of the Council’s Head of Building Control and normally ahead of any significant interruptions to Stadium operations or major non-association football events. For example, an emergency SAG was held on 27 March to discuss the impact of strike action on the Club’s forthcoming Premier League fixture against Nottingham Forest on 8 April and a further routine SAG was held on 2 April to prepare for the forthcoming Pink concerts in June.
- 4.3 In addition, the Club continues to hold monthly Business and Community Liaison Group (‘BCLG’) meetings, which began at the beginning of the construction of the Stadium. The Club also continues to meet regularly with the representatives of the business community through the Tottenham Traders Partnership (“TTP”) forums – to ensure that the impacts of events are as positive as possible.
- 4.4 On 13 February 2023 a full consultation took place with the Club’s Business and Community Liaison Group (BCLG). The Club discussed their intention to apply to increase the number of events on a permanent basis. This meeting was attended by Councillors, LBH Officers, Resident Association and Business representatives including TTP.
- 4.5 On 28 February a public exhibition was held at the M café at the Stadium to discuss the proposals and seek feedback on the operational delivery of events. Public Exhibition attendees included: representatives from local churches; resident representatives from Bromley Road; Love Lane; Northumberland Park; REACT Edmonton; Willoughby Lane; Cllr Ibrahim Ali; Cllr Erdal Dogan; Cllr Ajda Ovat.
- 4.6 On Wednesday 20 March 2023, representatives from businesses across N17 and beyond were invited to a special meeting to discuss how to maximise the benefit of events. Local business consulted included: the Chair and executive members of the Tottenham Traders Partnership; the Antwerp Arms; Café Lemon; the Victoria Pub; Blooming Scent Café; Queen of Hearts Floral Design; Goan Community Centre; Tottenham Community Sport Centre; McDonald’s; Daughters United, True Craft on West Green Road, The Post Bar and Chuku’s.
- 4.7 On Monday 25 March 2023, the Club held a special briefing for LBH ward Councillors to share details of the consultation to date and seek their views. The following Councillors were present: Cllr Ajda Ovat; Cllr John Bevan; Cllr Seema Chandwani; Cllr Ibrahim Ali; Cllr Erdal Dogan; Cllr Matthew White; Cllr Sean O’Donovan; Cllr Reg Rice; Cllr Isidoros Diakides; Cllr Sue Jameson; and Cllr Kaushika Amin. These Councillors represent the wards of: Northumberland Park; Bruce Castle; Tottenham Central; Tottenham Hale; and West Green. On Wednesday 27 March 2023, a further BCLG meeting took place and feedback from the consultation was presented to the group. The meeting was attended by Councillors, LBH Officers, resident association and business representatives including the chair of the TTP.

- 4.8 Finally on 3 April, the Club met with Chief Inspector Waterfield and Sergeant Underwood of the local Metropolitan Police Basic Command Unit (BCU) to rehearse the proposals and field questions.
- 4.9 A summary of the feedback received from these events is set out in the following section, along with responses to the issues raised.

Consultation Feedback

- 4.10 Throughout the consultation the Club collected feedback from those attending public events and meetings.
- 4.11 Attendees at events were asked to fill in a feedback form and state whether they support the principle of additional events at Tottenham Hotspur Stadium.
- 4.12 Of the feedback forms submitted to date:
- 66% were supportive of the principle of additional events
 - 25% were opposed
 - 9% were undecided.
- 4.13 The Club's proposals included:
- A restriction on boxing events with no more than two in a 12-month period
 - Restricting consecutive events to no more than four in a row
 - Restricting the number of events per week, with no more than five in one week
- 4.14 The Club also consulted on:
- The community ticket scheme
 - Introducing a priority ticketing window for residents
 - Enhancing the Club's support for worthy local causes
- 4.15 A clear majority of those consulted supported the principle of additional major non-association football events but gave very clear direction on how the Club could improve the operational delivery of its events. The most common positive themes were:
- Events create jobs and opportunities for local people as well as increased footfall and spend in local businesses.
 - The Club's community ticket scheme is a significant benefit of living near the Stadium and ensures residents feel a part of events.
 - High profile artists and events have 'put Tottenham on the map' as a destination and have helped change the perception of the area.
- 4.16 The most common negative themes were:

- Parking enforcement is inadequate on event days and the LAMP should be implemented more consistently (noting that parking enforcement is a Council rather than Club responsibility under the LAMP).
- A return to physical parking and visitor permits for those living within the CPZ.
- Any future calendar should account for school holidays to limited inconvenience to residents.

Responses to consultation comments

4.17 The Club have carefully considered feedback from the forums described above. The table below explains how it has listened and, either through the proposals or through the proposed mitigation will address comments received as a far as possible:

Comments	THFC response
Concern about Drumsheds events at the same time exacerbating traffic issues*	The Drumsheds venue is situated in the former IKEA store which is located in the London Borough of Enfield. THFC was consulted by the event promoter (Broadwick) prior to the submission of an application for a Premises Licence. THFC expressed concerns about the timing of new Drumsheds events relative to the THS as an existing licenced venue. In order to secure a Premises Licence from Enfield Council, Broadwick prepared a document in consultation with THFC (the "Simultaneous Events Management Plan") to put in place notification and co-ordination protocols. If necessary, Broadwick must alter their event start and finish times to avoid conflicts and minimise disruption. Although any complaints or concerns about Drumsheds events should be raised with Broadwick and or Enfield Council, THFC as a responsible venue operator will facilitate engagement between Enfield and Haringey Council's, Broadwick and the Club to establish if further improvements can be made to traffic management measures to reduce congestion in the local area.
LAMP should be reviewed will full engagement of BCLG*	The Major Event Local Area Management Plan (LAMP) is being reviewed and updated in accordance with the Stadium planning permission and S106 agreement. Any proposed changes to the LAMP should be evidence based and primarily through independent monitoring of sample events carried out by consultants for the Council at the Club's cost. In addition to the independent monitoring, the Club has taken on board feedback it has received from the local community through BCLG, TTP and individual comments from officers, members of the community and Ward Councillors. The draft revised Major Event LAMP will be submitted to Haringey Council during the determination of this planning application. If approved, revisions to the LAMP will be reflected in an updated 'Blue Book'. A draft of the revised Blue Book will be taken back to BCLG for comment before being finalised and distributed again.
Consideration should be given to local churches, particularly on religious holidays*	THFC has ongoing and long-term existing relationships with local churches and frequently distributes tailored communications to those within our immediate vicinity. Where possible we seek to support churches by providing additional car parking spaces when fixtures fall on a Sunday and impact on church services. The Club takes a similar approach to all third-party events and will continue to do so in order to minimise impact as much as possible.
Need to work with charities and community groups so they can benefit from events*	Charities and community groups from across Tottenham are regular beneficiaries of the existing community ticket scheme with thousands distributed to third-party events each year. The Club has long-standing relationships with a range of groups, regularly providing player appearances and support for charitable initiatives. The Club works closely with the BCLG and local ward Councillors to identify organisations that could benefit from the Club's support. A good example of this is Somerford Grove Adventure Playground with whom the Club has a close relationship.
Concerns about 4 or 5 events a week is too much*#	The Club acknowledges this concern and has volunteered three types of cap to address this concern. First, that there can be no more than four consecutive events in any one week. Secondly, that there can be no more than five events in a one week. Thirdly, that (unless otherwise agreed in writing with the LPA) there can only be two weeks in any calendar year where there are either four consecutive events or five events in any week. These restrictions do not apply currently.
A levy (e.g. £1) should be put on the ticket price	The Club acknowledges the principle of a direct financial contribution that is linked to additional events and is proposing a S106 obligation that will secure this.

to be re-invested within the community*	
Confirmation about who pays for policing*	The Club have engaged with the Metropolitan Police and this has not been raised as a concern. Recent increases in business rates are expected to more than cover any changes to policing requirements. The Club also pays directly for street cleaning and refuse collection for non-football events.
Concern about events coinciding with school holidays (inhibiting residents ability to move around).*#~	The Club recognise the potential for disruption to local residents. Holding events during school holidays is when some residents will be away on holiday. For those that are still at home, events will be carefully managed. The events and associated activities can also be enjoyed by local residents, particularly given the proposed preferential ticketing arrangements for locals (see below).
Can a business directory be organised*	The Club wholeheartedly supports this initiative and will work with the BCLG, TTP and other stakeholders to realise this. The Club is a long-standing member of the Tottenham Traders' Partnership and has consistently worked closely with businesses ahead of third-party events. The Club has previously signposted to other food and beverage venues on Club channels but will do so on a more consistent basis in partnership with the TTP and BCLG. The Club will also look to identify other opportunities to promote businesses in the local area e.g., via a presence on the Buy Haringey app and involvement in major local events such as Summer and Winter Festivals.
Bromley Road residents should be able to park in a different CPZ where Police request that they move their cars*	Officers are aware of this request and are investigating.
Could the increase be introduced more gradually#	The number of NMFs in any particular year fluctuates depending on a number of factors such as which artists are touring and whether other venues (such as Wembley Stadium) are hosting other events. It would be highly unusual for the THS to be hosting 30 NMFs in a single year, but the flexibility for it to do so means the venue can remain competitive and continue to attract the highest calibre artists to Tottenham.
Concern about parking and particularly LBH enforcement#~	Officers have been made aware of the parking enforcement issues, but the Club will continue to emphasise through comms to event goers that the THS is a public transport destination.
Is there an opportunity to extend the Victoria Line to Northumberland Park*#	Although beyond the scope of this application, it is a long-held aspiration that the Club will continue to lobby for.

* 25 March 2024 Councillor Meeting

#13 February 2024 BCLG meeting

~ Public consultation February to March 2024

5 Planning Policy Context

5.1 This Section summarises the national, strategic and local planning policy and guidance which is relevant to assessing the acceptability of the proposals. It also explains the planning designations that affect the Site.

The Development Plan

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the relevant Development Plan unless other material considerations indicate otherwise. The relevant Development Plan comprises:

- LBH Strategic Policies 2013 (with alterations adopted July 2017) (“SP”)
- LBH Development Management DPD (adopted July 2017) (“DM DPD”)
- Site Allocations DPD (adopted July 2017) (“SA DPD”)
- Tottenham Area Action Plan (adopted July 2017) (“TAAP”)
- London Plan (March 2021) (“LP”).

5.3 The National Planning Policy Framework (“NPPF”) (December 2023) and accompanying Planning Practice Guidance (“PPG”) are the principal material considerations in this case, alongside various Supplementary Planning Guidance/Documents (“SPDs/SPGs”) as noted below.

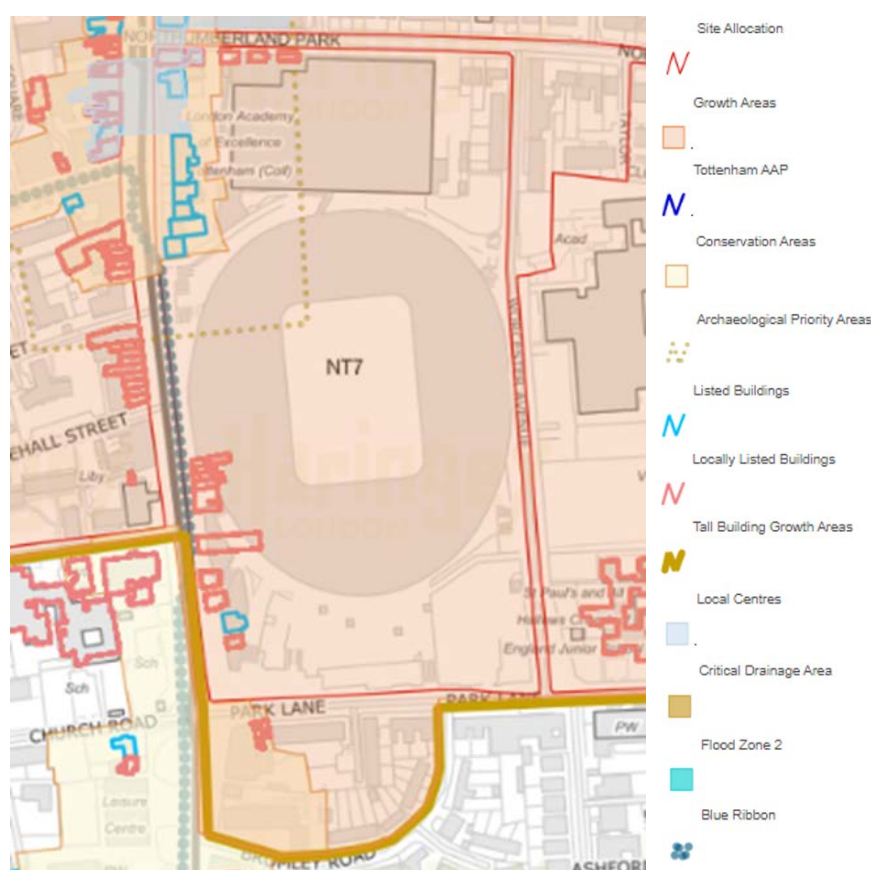
Planning Policy Designations

5.4 Table 5 below sets out the relevant designations affecting the site and Figures 4 and 5 illustrate the extent of these.

Table 2: Summary of Development Plan Site Designations

Designation	Policy
Upper Lea Valley Opportunity Area (“OA”)	LP Policy SD1
Tottenham Hotspur Stadium Site Allocation	LBH Policy NT7
Northumberland Park Growth Area	LBH Policy SP1
Tottenham AAP	Tottenham Area Action Plan
Tall Building Growth Areas	LBH Policy DM6
Archaeological Priority Area	LBH Policies SP12 and DM9
North Tottenham High Rd Conservation Area (adjacent to)	LBH Policy CSV1
Critical Drainage Area	LBH Policy DM26
Listed Buildings within or surrounding (statutory & locally)	LBH Policy CSV1
Flood Zone 2 (in part)	LBH Policy DM26

Figure 1: Extract of Policies Map for the NDP Site



London Plan (March 2021)

- 5.5 The LP is the Spatial Development Strategy for Greater London. It sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth. It defines the London Borough of Haringey within 'Outer London' and the Upper Lee Valley Opportunity Area (the "OA"). Significant growth is projected in the OA, indicatively estimated at 21,000 new homes and 13,000 new jobs. Paragraph 2.1.29 states:

"The Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of development opportunities for higher density development. These opportunities include...other accessible sites within and on the edge of town centres...Crossrail 2 will transform transport connectivity and capacity in the Upper Lee Valley and is vital to support the full, long-term potential development capacity."

- 5.6 Policy SD1 'Opportunity Areas' sets out how Local Planning Policy should encourage and deliver growth in OAs. The Mayor will ensure that Opportunity Areas contribute to regeneration objectives by tackling spatial inequalities and environmental, economic and social barriers that affect the lives of people in the area, especially in Local and Strategic Areas for Regeneration.
- 5.7 Policy SD1 also states that Boroughs should support development which creates employment opportunities and support wider regeneration and ensure that development proposals integrate into the surrounding areas.

- 5.8 Policy D3 states that all developments “*must*” make the best use of land by following a designed approach “*that optimises the capacity of sites, including site allocations*”.
- 5.9 London Plan Policy GG5 ‘Growing a good economy’ seeks to conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners. This includes promoting and supporting London’s rich heritage and cultural assets, and its role as a 24-hour city.
- 5.10 London Plan Policy E10 ‘Visitor infrastructure’ states that London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions particularly in parts of outer London that are well-connected by public transport, taking into account the needs of business as well as leisure visitors.
- 5.11 London Plan Policy HC5 ‘Supporting London’s culture and creative industries’ also states that development proposals should enhance existing venues especially where they can provide an anchor for local regeneration and in areas with a good public transport connectivity.
- 5.12 London Plan Policy HC6 ‘Supporting the night-time economy’ is concerned with supporting the night time economy growth and diversification, in particular within strategic areas of night-time activity.

LBH Strategic Policies

- 5.13 The strategic policies of the SP DPD set out a vision and key policies for the future development of the Borough up to 2026.
- 5.14 Policy SP1 (Managing Growth) states that the Council will focus growth and promote development in three Growth Areas, one of which is North Tottenham (which includes Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium).
- 5.15 Policy SP15 ‘Culture and Leisure’ supports the provision of social and cultural venues in all areas of the borough that support all formal and informal cultural and leisure activities.

LBH Development Management DPD

- 5.16 The DM DPD sets criteria-based policies against which planning applications will be assessed, including policies which give effect to the designations relevant to the Site.

Tottenham Area Action Plan

- 5.17 The TAAP is the key statutory planning document for delivering the regeneration strategy for Tottenham. It establishes the local spatial planning framework for the area, giving detailed expression to the overall growth objectives for Tottenham as contained in the SP DPD.
- 5.18 The Site lies within the Tottenham Hotspur Stadium site allocation (NT7) for the following development:

“A Redevelopment of the existing football stadium to increase match day capacity, with the introduction of residential, commercial, retail, education, community, leisure and hotel uses, and improved public realm across the site.”

B The Council will support a mix of leisure uses around Tottenham Stadium to ensure it is a destination on match and non-match days;

C Development will contribute to creating a wider commercial and visitor destination for the area;

D Walking and cycling are important modes of transport around the Stadium, and links will be encouraged, particularly between nearby stations at White Hart Lane and Northumberland Park, and the Stadium;

E New health uses will be incorporated into the Stadium"

- 5.19 The TAAP is explicit in that the Council will support the Club to ensure developments enhance the investment in the stadium and respect the operational needs of the Football Club. It specifically makes a clear rationale for a meaningful leisure component as set out in the supporting text (our emphasis underlined):

The reconstruction of Tottenham Hotspur's football stadium and complementary development on High Road West and Northumberland Park, will provide a new leisure destination for north London within the borough alongside much needed new jobs, retail space, services and homes for local residents [Page one]

The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area's reputation as a premier leisure destination within North London. [Paragraph 3.23]

The growth in Tottenham Hale will be supported and will benefit from the provision of both new office space and increased retail development as a new District Centre. This will be guided by a District Centre Framework. In North Tottenham, there is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site as a catalyst for wider change, ensuring this area becomes a hub of activity throughout the week and not just on match days. This can be achieved by establishing the location as a premier leisure destination for London whilst also retaining and enhancing a more local retail function to support the community. [Paragraph 2.37]

National Planning Policy Framework (December 2023)

- 5.20 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF is a material consideration in planning decisions.

New Local Plan

- 5.21 The LBH are in the early stages of updating their Local Plan. This carries little weight currently and does not impose any design standards or policies in its current form. The Draft Local Plan is expected to be published in summer 2024.

6 Planning Considerations

6.1 This section assesses the key planning considerations and matters relevant to the proposals against all levels of planning policy. It assesses the following key issues:

- The overall principle of additional events
- Socio-Economics
- Transport impact
- Noise

Principle of additional events

6.2 The increase in the number of events per year at THFC Stadium is supported by all levels of planning policy.

6.3 The NPPF places “significant weight” on the need to support economic growth, taking into account both local business needs and wider opportunities for development. The NPPF also notes the importance that the planning system can play in facilitating social interaction and creating healthy and inclusive communities. Safe and accessible developments are important to achieving this, and crime and disorder (and the fear of such) are considerations. Paragraph 97 in particular supports social, recreational and cultural facilities.

6.4 London Plan Policy GG5 ‘Growing a good economy’ seeks to conserve and enhance London’s global economic competitiveness and ensure that economic success is shared amongst all Londoners. This includes promoting and supporting London’s rich heritage and cultural assets, and its role as a 24-hour city.

6.5 London Plan Policy E10 ‘Visitor infrastructure’ states that London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions particularly in parts of outer London that are well-connected by public transport, taking into account the needs of business as well as leisure visitors.

6.6 London Plan Policy HC5 ‘Supporting London’s culture and creative industries’ also states that development proposals should enhance existing venues especially where they can provide an anchor for local regeneration and in areas with a good public transport connectivity.

6.7 London Plan Policy HC6 ‘Supporting the night-time economy’ is concerned with supporting the night time economy growth and diversification, in particular within strategic areas of night-time activity.

6.8 Policy SP15 ‘Culture and leisure’ supports the provision of social and cultural venues in all areas of the borough that support all formal and informal cultural and leisure activities.

6.9 The Site is also located in an OA and Growth Area where regeneration, growth and investment is strongly supported and encouraged. Haringey’s Local Plan specifically encourages growth in the most suitable locations including North Tottenham where the Site is located. The TAAP

is also explicit in that the Council will support the Club to ensure developments enhance the investment in the stadium and respect the operational needs of the Football Club.

- 6.10 The proposed amendments relate to an increase in activity of an existing use in an established venue. The nature of the site is therefore suitable for additional events. It is an established sporting and music venue that already benefits from excellent existing public transport connections which have been developed and improved since the determination and completion of the new Stadium.
- 6.11 The proposals further build upon the aspirations outlined within the TAAP to create a new leisure destination in North Tottenham focused around the Stadium complex.
- 6.12 The principle of increasing events within a given year has already been established, assessed and considered acceptable by LBH (in the July and October 2023 NMAs) against the same planning policy context.
- 6.13 As such, the provision of additional stadium events in an OA and growth area is in line with national, regional and local policy and is accordingly acceptable in principle.

Socio-Economics

- 6.14 As explained in Section 2 of this Statement, the redevelopment of the Stadium site was a significant new symbol of investment and since it has completed it has been a catalyst for wider regeneration and redevelopment. The Stadium has brought in additional expenditure and income generation to the local area which in turn has stimulated substantial levels of new employment through increased leisure, tourism and business activity.
- 6.15 THFC's contribution to GVA within the Borough was £296 million in 2021/22. Introducing additional events at the Stadium will increase this further through the greater amount of visitor expenditure associated with additional spectators spending outside the grounds within the wider local area primarily in services such as hospitality and food and drink. The Socio-Economic Report submitted in support of this application estimates GVA to grow within the Borough to £549 million in 2026/27. THFC's contribution to GVA is expected to grow across the tri-borough area and Greater London as well.
- 6.16 Furthermore, the number of employment and jobs is expected to grow. Introducing more events throughout a year will result in additional level of spectators which requires an increased number of event-day staff. The Socio-Economic Report estimates THFC's contribution in terms of employment is forecasted to grow from 3,700 to 4,300 FTEs by the 2026/27 season. A significant proportion of these are in the LBH itself.
- 6.17 In terms of crowd safety, in accordance with the S.106 agreement, the Club will continue the review of the LAMP and associated obligations with the Council and other key stakeholders. This will ensure that any changes to the LAMP are evidence-based and informed by feedback from the local community. Any impacts to local people will therefore be carefully managed and mitigated in line with the existing obligations.
- 6.18 In summary, the additional spending outside the grounds of the Stadium and the additional employees will result in major beneficial effects at the local level. The economic impact of the

Stadium has and will continue to bring a significant increase in visitor numbers which translates into an increase in spending within the wider local area. Any impacts to local people will be carefully managed and mitigated.

Transport Impact

6.19 London Plan Policy T1 'Strategic approach to transport' requires development proposals to facilitate the delivery of the Mayor's strategic target of 80% of all trips in London to be made by foot, cycle or public transport by 2041 and states that development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.

6.20 London Plan Policy T4 'Assessing and mitigating transport impacts' requires that development proposals reflect and are integrated with current and planned transport access, capacity and connectivity. The cumulative impacts of development on public transport and the road network capacity must also be taken into account.

6.21 Policy SP7 'Transport' seeks to promote public transport, walking and cycling. This is reiterated in Site Allocation NT7 which states that:

"Walking and cycling are important modes of transport around the Stadium, and links will be encouraged, particularly between nearby stations at White Hart Lane and Northumberland Park, and the Stadium"

6.22 The Site is in a highly accessible with a PTAL rating of 3 to 5 . It is a six minute walk to White Hart Lane Overground Station to the west, a ten minute walk to Northumberland Park Rail Station to the east and also within walking distance of various bus stops.

6.23 Independent monitoring of transport mode shares carried out in accordance with S106 requirements immediately post the opening of the Stadium and more recently (post-Covid 19) indicate that the Stadium is already close to achieving its maximum mode share of 23% of spectators travelling to football matches by private car.

6.24 Since the Stadium was granted consent, significant improvements to the public transport network have taken place in the vicinity of the Site, including:

- The closest station to the Stadium, White Hart Lane, was completely redeveloped at a cost of £18m and reopened in 2019. The station is a six-minute walk from the Stadium campus and then a three-minute connection on London Overground to the Victoria line at Seven Sisters. The station was remodelled to provide better connectivity and improve platform loading. Brand new air conditioned and wi-fi enabled rolling stock was introduced on the line in 2020, which runs between Liverpool Street and Enfield Town/Cheshunt.
- The second closest station, Northumberland Park, was completely redeveloped as part of the wider £170m upgrade of the West Anglia Route and reopened in 2019. The station is a ten-minute walk and then a four-minute connection to the Victoria line at Tottenham Hale. The station is served by Greater Anglia services connecting Stratford/Liverpool Street with Hertford East/Bishop's Stortford.

- The third closest station, Tottenham Hale has also been completely redeveloped as part of the West Anglia Route upgrade and reopened in 2022. Tottenham Hale is a 25-minute walk and now a major interchange providing a hub for London Underground, Greater Anglia and Stansted Express services as well as numerous bus services. Tottenham Hale itself is now a successfully established regeneration scheme providing housing, shopping and leisure services. 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.
- The fourth closest station, Seven Sisters provides a connection between London Underground and Overground services. The station is a 30-minute walk but also the principal public transport hub on football matchdays and other major events because of the speed and frequency of the Victoria line. King's Cross St Pancras is an 8-minute connection and the West End via Oxford Circus, only 12 minutes. Following the last upgrade in 2016, the Victoria line is the highest frequency and most reliable line on the London Underground network providing 33 trains per hour during peak periods.
- These services connect with the Elizabeth line at Liverpool Street. The £19bn line opened in 2022 and connects Heathrow/Reading and Shenfield/Abby Wood via high frequency, state-of-the-art rolling stock.
- The Mayor of London's Cycling Super Highway 1 (CS1) which completed in 2016. This provides better north/south cycling connectivity to the new Stadium which is located at its planned northern terminus.

6.25 Recognising that the rail network carries the majority of the visitors to the Stadium and with the above improvements, indicates that there is sufficient capacity and suitable management and mitigation in place for the Stadium to take on additional events. The proposals are therefore in accordance with planning policy in terms of making the effective use of land that is reflective of the local area in terms of connectivity and accessibility.

6.26 In terms of mitigating the transport related impacts, the 2015 ES found neutral effects (not significant) in terms of event day road closures and minor adverse effects in terms of additional queues at rail stations and underground stations. To mitigate against the development, the S.106 Agreement was completed with a number of mitigation measures (summarised at Paragraph 2.14 in this Statement) that aimed at minimising the impact on the local transport network.

6.27 Since the completion of the Stadium, a number of MNFEs have taken place in accordance with the limits as agreed by LBH. THFC therefore have sufficient knowledge and experience to identify precedents from events to inform travel related 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.

6.28 The supporting ES Compliance Note demonstrates that the increase in MNFE from 16 to 30 per year will not result in new or materially different effects as reported within the 2015 ES.

6.29 The existing mitigation and monitoring measures have resulted in a number of successful 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 LBH. The potential introduction of an additional 'Intermediate Event' (10,001-36,500 spectator) tier in the S106 may help to ensure that mitigation in management plans is better tailored to the scale of events, but this application is not dependent upon that mitigation measure.

- 6.30 In addition, and consistent with the requirements of the current S106 and Stadium Premises Licence, the majority of future major events at the Stadium will be required to submit a Bespoke Transport Plan for approval in advance of the event taking place.
- 6.31 In conclusion, whilst it is recognised that major events bring a significant amount of transport movements, the Stadium is very well located and benefits from a high capacity public transport network. Measures are in place to promote sustainable modes of transport to visitors alongside close working arrangements with key stakeholders to ensure the network can facilitate the flow of large numbers of visitors whilst also accommodating the needs of local residents. In addition, substantial improvements have been made to the public transport network since the Stadium has been approved making the area highly accessible.
- 6.32 As such, the existing and proposed mitigation measures detailed above demonstrate that it would be sufficient to ensure that resultant increases in visitors to the area from the additional events could be managed in such a way that disruption to residents and businesses in the area would be kept within acceptable limits.

Noise Impact

- 6.33 The NPPF seeks to avoid noise giving rise to significant adverse impacts on health and quality of life. PPG also notes that it is necessary to consider whether or not an adverse or significantly adverse impact is likely to occur, and whether or not a good standard of amenity can be achieved.
- 6.34 London Plan Policy D14 'Noise' states that in order to reduce, manage and mitigate noise to improve health and quality of life, proposals should manage noise by mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses.
- 6.35 Policy DM1 'Delivering high quality design' requires development proposals to ensure a high standard of privacy and amenity for the development's users and neighbours. Issues relating to vibration and noise that arise from the use and activities of a development must be addressed.
- 6.36 The 2015 ES concluded that there would be direct and permanent effects at the receptors as a result of stadium noise but that these would be negligible to minor. The predicted music noise levels at the existing receptors met the criterion of the 75db(a) level over a 15 minute period. Because of this, no mitigation measures were required.
- 6.37 Condition B17 attached to the Hybrid Consent required a noise control plan to be submitted and approved. It also sets out that noise generated from music concerts must not exceed 75dB LAeq, over a 15 minute period as measured at a distance of 1 metre from the facade of any existing noise sensitive premises. A noise control plan was approved pursuant to Condition

B17 on 5 April 2018 under Application Ref. HGY/2017/2565. The Stadium operates under the details approved within this plan and within the noise limits of Condition B17.

- 6.38 A series of noise monitoring is undertaken during each MNFE at the sensitive receptor locations to ensure that the previously predicted noise levels are valid. Since the Stadium opened and has held noise generating events such as music concerts, it has been found that the acoustic design of the Stadium has been better than anticipated. The monitored noise data show that sensitive receptor locations are comfortably below the 75 dB criteria for Live Music events.
- 6.39 This S73 proposes no increase to the level of noise, only the number of events which generate noise. Impacts arising from noise in relation to this S73 should therefore be assessed in relation to the frequency that nearby receptors are exposed to it, not the overall impact of noise which has already been considered acceptable by Officers under the Hybrid Consent.
- 6.40 The increased frequency of noise was assessed in the 2023 NMAs and this was found appropriate. The additional events that were approved under these NMAs have also ran successfully with minimal complaints. Future events will continue to operate within the limits of Condition B17 and the approved noise control plan.
- 6.41 As set out in the ES Compliance Note, the increase in MNFE from 16 to 30 per year will not result in new or materially different effects as reported within the 2015 ES. The existing monitoring measures during stadium events has proved that there have been no exceedances of the absolute limit of 75 dB(A) thereby minimising any impacts to amenity.
- 6.42 In summary, the proposals are considered to comply with London Plan Policy D14 and Policy DM1 by not resulting in unduly adverse noise impacts.

Mitigation

- 6.43 Recognising the additional activity in the local area, THFC are proposing various measures to assist with the integration of the events, with a particular emphasis on initiatives for the local community.
- 6.44 Other measures are expected to include:
- A continuation of the highly successful scheme of issuing free tickets to the local community (min 100 tickets per event);
 - A 24hr advance window for the local community to purchase tickets at face value; and
 - A contribution of £5,000 (monetary or in kind) per event to good causes locally. This would be for any additional non-association football event over and above the permitted 16 events equating to a contribution of up to £70,000 per annum. The Club would retain control of the funds but the administration process and process of selecting and agreeing projects would need to be done in collaboration with the community (likely through the BCLG).

Summary

- 6.45** The proposal is considered to accord with the development plan, having regard to material planning considerations. While there will inevitably be some additional impacts associated with an increase in the number of MNFEs, the existing range of mitigation measures and resultant significant benefits concludes that on balance, the proposal is therefore acceptable.

7 Summary and Conclusions

- 7.1 THFC Stadium continues to play a very important role as a catalyst for wider regeneration and redevelopment across the local area. It brings in additional expenditure and income generation to the local area and has stimulated substantial levels of new employment through increased leisure, tourism and business activity.
- 7.2 When the new Stadium was granted planning permission in 2016, Condition B16 was imposed to restrict the number of non-football related events (greater than 10,000 visitors) to no more than 16 in any one year. This was amended in July and October 2023 to exclude the calendar years 2023 and 2024.
- 7.3 This S73 seeks to amend the condition B9 (formerly B16) to increase the number of permitted MNFE from 16 to 30 per year. It would provide various other controls including number of boxing events (with no more than 2 annually); the number of consecutive events (with no more than 4 in a row); the number of events per week (no more than 5) and a limit on the number of events over a two week period. This variation would allow the use the Stadium, on a permanent basis, greater flexibility and choice on events for the local and wider community.
- 7.4 The Stadium is wholly suitable to operate in this manner and is purpose-built for holding such events in a sustainable location. There is significant sustainable public transport infrastructure situated around the Stadium, which has been enhanced and upgraded to enable it to operate efficiently. Facilitating additional events is also in compliance with policy and the site allocation.
- 7.5 The assessment provided in this Statement demonstrates that the proposals accord with planning policy and will not result in any unacceptable effects in terms of transport, noise and socioeconomic related impacts.
- 7.6 The proposals will bring significant economic benefits to the local economy, with spending on accommodation, food, drink and other ancillary items within the local area. The uplift in the event cap will also create employment opportunities such as additional event day steward and catering positions.
- 7.7 The proposed amendments seek to enhance the Stadium's role as a multi-purpose and renowned music venue. The Stadium has become a prominent venue in London's cultural and music landscape and hosting music concerts and other major events has become a key function of the Stadium's success. The amendment to Condition B9 is sought to enhance the programme of events at the Stadium and meet demand for concert space to attract a wider range of artists.
- 7.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.
- 7.9 As demonstrated in this Planning Statement, the Proposed Amendments are in accordance with national, strategic and local policy. It is therefore considered that planning permission should be granted for the proposed development.