

SUPPORT	Officer Response
• Benefits will outweigh harm • Extra jobs and employment in the area • Boom for local businesses • Will help further regeneration • Support on proviso that road closures reviewed • Support on basis that there is community benefit fund	The benefits are noted in the report and the balance between benefits to the area and wider economy is weighed against the impact on the locality and local residents.
OBJECTIONS	
Intensification of use: • Increase is too great / too soon • Existing issues need to be satisfactorily resolved first • Drumsheds applying to increase events / hours • THFC or MNFEs will be weekly occurrence • Maximum so far has been 10, so should be more gradual increase • If intermediate event brought in then should be lower level of 20k first • This is a football stadium first and event space as an additional service	The intensification is considered in detail in the report. The permission is subject to a review mechanism before any permanent cap would be approved. Licensing also have also confirmed there are mechanisms in place through premises licences that could be used if required. Cumulative impacts of Drumsheds will be mitigated by the Drumsheds management plan as part of their licensing agreement, meaning that those events amend start / end times / dates to accommodate THS events. The potential for weekly disruption is noted, as is the maximum number of MNFEs to date. Intermediate events are relatively untested, and these are not considered as part of this application. The stadium will remain as a football stadium as primary function but was always envisaged to have additional functions.
Socio-economic: • People head straight to stadium – minimal economic benefit • Claims of benefits are exaggerated – no independent review of economic results	The Ernst & Young (EY) report provides detail of spending outside the stadium and businesses have expressed their support for additional footfall. No independent assessment is considered necessary given and the EY report is sufficient to provide clarity of this as a broad benefit to the local, regional and national economy.

• Should be trying to increase awareness of businesses in the area rather than just drawing attendees into the stadium • Northumberland Park remains second most deprived ward in London • Stadium aims to keep people in rather than using local businesses • More free tickets required for residents • Free tickets shouldn't be traded for more profit • Extra income for the Club at residents' expense • Residents pay council taxes for roads/ emergency services / litter collection etc that cannot be undertaken • Typology of business focussed on visitors (fast food, betting shops) rather than for locals (small innovative creative businesses), many of which close on non-event days • Wider economic base / wider commercial uses should be encouraged • Area needs more than just the focus of Stadium to thrive • Club needs to invest in local community events and organisations • Lot of staff are not local • Staff not properly organised for marshalling etc. • Independent survey of impacts required • Gig economy jobs rather than careers • Transport Statement needs to be updated to include Drumsheds, newer road closures etc. • Better consultation with neighbouring boroughs required • Why is the Euros cited as a reason to increase – have capacity to provide unlimited football and 16 events	The income to the area and local jobs are welcomed as a boost to a deprived area. The stadium has been consulting with Tottenham traders and BCLG through the application process. A condition will require the Club to sign up to a version of the Business Charter to support further emphasise the relationship with local businesses. There are currently no free tickets required for MNFEs, so the minimum of 100 tickets is welcomed. In reality the Club often provides more than this for events through their various connections to schools and the Foundation. The creation of a community fund, on top of the free tickets and ticket window will help compensate local residents and the area. Emergency services will retain access and LBH Cleansing have raised no concerns about not being able to undertake their refuse management requirements. The main benefit is to food and beverage offering. The Council can refuse applications for additional fast food takeaway outlets if it feels these are over saturating the area at the expense of other businesses. The additional events are not considered to create significant impacts in this regard beyond the existing stadium and events. The stadium also provides a number of other tourist attractions such as the TE building, F1 track and Skywalk. It is accepted that the jobs will be top up wages rather than training and long term employment, but the area does have high unemployment and the jobs are welcome and could lead to careers in hospitality roles in the conference facilities and future hotel. Additional stewards are being employed with local
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	knowledge in supervisor roles. The club also run job fairs aimed at the local community. The Euros and year of Culture events could come out of the existing cap. These are not justification as such but do show the benefits of helping lift the area.
Noise and disturbance: • Locals accept disruption from Spurs games as part of the established community but 30 events on top is excessive beyond the established level of disruption • Restrictions on other stadia in similar sites e.g. 6 MNFEs at Emirates / 18 floodlit events at Lords • Light pollution from floodlights • Disruption will not be outweighed by benefits • Overcrowding inhibits walking and public transport use • Disruption of daily routines • Residents trapped in their homes and difficult to plan visitors • Hard to leave house with pram / if disabled on event days • Honking of horns and hostilities • Noise from stadium (PA announcements / general) • Cumulative impact with events from Drumsheds • BCLG have not had sufficient opportunity to help progress the LAMP and engage • Lack of communication of events and closure times • Communication needs to be improved – easily accessible information on events calendar or app and clearly signposted	Officer Response: The overall impacts of additional events are considered in depth in the report. There is a baseline level of disturbance to daily routine that cannot be mitigated for, which is considered in the overall balancing of harm to the area over socio-economic benefits. The disruption to day to day life is acknowledged in the Noise and Transport sections of the report and it is accepted that these will have an impact. Other stadia are considered with regard to their own specific circumstances. This will be an increase in number of events, so noise strategies, lighting etc will be dictated by the previous conditions. Noise inside the Stadium is monitored and considered with regard to nuisance. There is an acceptance that the Stadium events will create a level of noise and disturbance and restrictive conditions are monitored in this regard. If there are any specific complaints the these should be directed to the complaint hotline. Drumsheds are subject to a restriction on start times. The supporting letter responds to previous Cllr concern regarding communication and outlines ways the club communicates and updates information. If there are specific issues, then these can be raised through Cllrs and can be better signposted. The issues outlined in consultation have been passed onto the Club as well and will be subject to review. The Blue Book will also outline how to stay connected with events and closures.

• Link to https://www.tottenhamhotspur.com/the-stadium/local/ is highlighted in comments but could be more prominent • Events should be flagged as provisional where subject to tv coverage changes • Alerts of events should be tailored to events (no need for away games) and kept updated • Late night finishes – pedestrian noise on sensitive side roads • Loitering from new visitors to stadium for one off events • Exacerbation of existing anti-social behaviour • MNFEs have higher anti-social behaviour associated with them • Street drinking – lack of enforcement of licensed premises selling and promoting drinking • Requirement for better / improved infrastructure e.g. bins, toilets etc. • Special events bring people to the area for first time – need more guidance • Boxing particularly bad for anti-social behaviour	ASB and noise associated with attendees leaving is under review in the LAMP and constantly monitored by LBH Licensing when event licenses are issued. Stewarding, toilets and signposting are being improved and should be reported where there are specific issues so these can be reviewed. The boxing is to be capped at 2 events a year and if issues persisted then licenses could be affected. Certain ASB levels are somewhat unavoidable but these can be mitigated through existing obligations. Stewards are employed to direct pedestrians along main routes, but it is accepted that they have limited powers of control and some may stray from these routes. However, these occurrences are less likely with MNFEs where attendees have less knowledge of the area. Signage and steward knowledge are being addressed as part of the LAMP review, as are siting of toilets and bins. Licensing have requested further resourcing to address ASB. Boxing is proposed to be capped at 2 events a year.
Transport issues: • PTAL 3 is not “highly accessible” (as stated in Planning Statement) • Residents re-routed the long way around stadium • Additional stress from road closures • Length of time for road closures for certain events i.e. NFL • Additional congestion on adjacent roads • Increased reliance on residents having to plan lives around major events	Officer Response: The site has various PTAL ratings with the west of the stadium rated 4 and 5 and the east lower but this is considered to be well connected for the purposes of use of the stadium. There is an unavoidable level of disruption from events and required road closures, but attempts are made to minimise these through the S106 obligations. This base level of unavoidable disruption is considered in the assessment of the additional events.

• Long walk to bus during closures • Details of air quality results / traffic surveys to be detailed by Council • Increased stress on local transport • Overcrowding at stations • Need tangible benefits – improvement to infrastructure etc. • No substantial improvements in infrastructure since stadium opened • Modal split for car use / cycling to be scrutinised - evidence of low car use? • Modal split for different types of MNFEs not specified in Planning Statement • Cycle lane CS1 is partially closed on event day despite being advertised – danger for cyclists • Lack of cycle storage • Drivers with lack of knowledge of routes and LTNs • Larger area should be closed off for non-local drivers • Further traffic filtering / LTNs required to stop rat runs of side / adjacent streets to High Road (LTNs focused in West Tottenham) • Bromley Road (and other adjacent roads) not allowed to leave even in emergency • Appropriate parking required • Residents having to park further away on event days • Issues of taxis and chauffeurs waiting (no enforcement if someone waiting in car) • Abuse of blue badges - review enforcement	Air quality monitoring data is provided to LBH and remains neutral. Transport comments have confirmed that there is capacity within the transport network to accommodate the extra events. There is a queue management obligations and retention and early access incentives in place, which will be further monitored as a means of staggering attendees arriving and leaving. The additional events would require significant infrastructure improvements. Further monitoring of modal splits is required under S106 obligations and will be reviewed further as part of the submission of a MNFE Travel Plan, as will the cycle strategy. The cycle lane is partially closed off due to queue management at Tottenham Hale, but this is just a small section of the total superhighway. CPZ and highways management are subject to review as part of the S106. Any further expansion of LTNs would require extensive consultation and review before it could be implemented. A Red Route emergency corridor is being investigated and a contribution of £50k has been requested as a contribution to this. Parking is provided and parking enforcement are aware of the issues and are seeking to manage these. This is undertaken by LBH. The aim is to reduce car travel for all events, particularly for concerts, which have a target of 10% mode share for cars. This will be monitored and managed through bespoke Travel Plans. The advance ticket window will also encourage greater uptake of ticket purchasing from the local community, which aims to increase walking mode of transport. The walking routes will also be updated in this regard. An AQ report has been submitted as part of the S106 requirements and shows air quality neutral.
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• Transport impacts in Planning Statement focussed on football events not on non-football events • Demographic for events far wider – less likely to use public transport, especially late at night. • EV charging points can be used by anyone on event day • Unofficial temporary car parks encourage driving • Parking restrictions have led to more off-street parking provision • Air quality issues from traffic backing up and engines revving (pollution already exceeds WHO limits) • Associated noise and air pollution	
Issues with benefits: • Tickets unaffordable to many residents • Website for advance tickets often has broken links / webpage • 5k contribution on events over existing 16 is insufficient compared to profit for Club	Officer Response: At least 100 free tickets will be provided for all MNFEs and local residents will also have priority for booking tickets. Any complaints about the website should be made to the Club, but a requirement of the S106 will be that the 24-hour window is advertised and functions. Officers have suggested additional community funding would help mitigate the impact but the Club have insisted that the £5k per event is more generous than comparable stadia, which offer no fund at all.