

Addendum

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Planning Sub Committee – 17 March 2022

ADDENDUM REPORT FOR ITEMS

UPDATE FOR CONSIDERATION AT PLANNING SUB-COMMITTEE Item No. 7

Reference No: HGY/2021/3175	Ward: Northumberland Park
<p>Address: High Road West N17</p> <p>Proposal: Hybrid Planning application seeking permission for:</p> <p>1) Outline component comprising demolition of existing buildings and creation of new mixed-use development including residential (Use Class C3), commercial, business & service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2), and Sui Generis uses together with creation of new public square, park & associated access, parking, and public realm works with matters of layout, scale, appearance, landscaping, and access within the site reserved for subsequent approval; and</p> <p>2) Detailed component comprising Plot A including demolition of existing buildings and creation of new residential floorspace (Use Class C3) together with landscaping, parking, and other associated works</p> <p>Outline:</p> <ul style="list-style-type: none"> • Demolition of most buildings (with retention of some listed & locally listed heritage assets); • New buildings at a range of heights including tall buildings; • Up to 2,869 new homes in addition to Plot A (including affordable housing); • At least 7,225sqm of commercial, office, retail, & community uses (incl. new library & learning centre); • New public park (min 5,300sqm) & new public square (min 3,500sqm); & • Other landscaped public realm and pedestrian & cycle routes <p>Detailed:</p> <p>Plot A - Demolition of 100 Whitehall Street & Whitehall & Tenterden Community Centre and erection of new buildings of 5-6 storeys containing 60 new affordable homes & open space.</p> <p>Applicant: Lendlease (High Road West) Limited</p> <p>Case Officer Contact: Philip Elliott</p>	

See also-

Appendix 3 – Neighbour Representations

Appendix 11 - QRP Report (17 September 2019)

Appendix 12 - QRP Report (03 March 2022)

Appendices enclosed

- i) 14th March Objection from THFC
- ii) 16th March Objection from THFC (with appendices 1-3)
- iii) 16th March letter received Daniel Levy (Chairman) (with massing comparison)
- iv) 16th March Objection from Arup
- v) Final LBH Transport Comments
- vi) CCG Further representation
- vii) TFL further comments

ADDITIONAL REPRESENTATIONS AND CLARIFICATIONS

Para 5.3-

Correction- TAG Love Lane ~~Love Lane Residents Association~~.

THFC Objection 04/03/22- *is set out in appendix 3 but not summarised at para 5.5 and raised the following points:*

- Lack of meaningful pre-application consultation with THFC prior to submission
- Concerns with the flexibility in the uses and design
- Concerns with lack of certainty on public benefits
- Crowd flow concerns
- The proposal fails to deliver the objectives of the TAAP and the HRWMF
- Concern that the applicant has relied on the illustrative scheme, rather than the maximum scale of development to assess the impact of the development
- The degree of flexibility and corresponding lack of certainty over the delivery of public benefits mean the Council is unable to lawfully discharge its duty pursuant to Section 38(6) of the 2004 Act.
- The Council cannot quantify the public benefits and carry out the necessary balancing exercise for the heritage assessment .
- Discrepancies between the design code and parameter plans
- THFC does not consider that the HTVIA robustly or credibly assesses the full potential impacts of the application.
- The Printworks permission has not been included in the cumulative assessment
- The Council cannot lawfully assess and determine the High Road West Application.

14th March Objection from THFC Appendix i

Summarised below.

The Crowd Flow Study provided requires a further 30 day notification in line with EIA regulations.
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THFC need time to review the Crowd Flow Study and respond to it and insufficient time has been provided.
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Officer report does not address previous comments

16th March Objection from THFC – Appendix ii

Summarised and addressed below.

THFC’s crowd flow consultants conclude that the Crowd Flow Study does not provide sufficient confidence that safe and efficient crowd flow operations can be provided both during the 10 year construction period and also in the permanent “end state”.

The interaction between the High Road West Application and the current crowd flow operations associated with the Tottenham Hotspur Stadium give rise to very real practical, legal and financial considerations that have not been considered by officers

The ultimate risk to THFC in the event that the applicant’s proposals do not work, is that the Tottenham Hotspur Stadium licence will be revoked or for example the capacity of the Stadium is reduced.

THFC wrote to the Council’s Head of Building Control in his capacity as chair of the Tottenham Hotspur Stadium Safety Advisory Group to set out its concerns and understands that he has recommended to officers that an emergency meeting of the SAG (involving all relevant stakeholder members) should take place to consider the Crowd Flow Study before the Council (in its capacity as local planning authority) determines the High Road West Application. This advice has been ignored.

Officer note: The Head of Building Control has confirmed in written advice:

“At no point did I say that the SAG should take place before the Planning Committee, as it is not my remit to make such a statement as I am not a planning professional.

As Chair of SAG I will arrange a meeting to discuss in detail crowd flow, where I will invite LendLease to present their proposals in detail to the wider SAG, including the Metropolitan Police, British Transport Police, London Fire Service, London Ambulance Service, Transport providers (London Overground and Arriva Rail London), THFC and Council colleagues. In addition as I have previously stated, should the scheme gain permission, then I would propose more regular SAG meetings as the site works progress in order to monitor what is known as zone X (area leading to the transport hub), where I would invite personnel from LendLease and/or their contractors to the meetings in order to provide up to date information to the Group.”

The Head of Building Control’s advice has not been ignored and has been followed. A SAG meeting is being organised for April 2022.

The Council’s 3rd party crowd flow expert’s concerns have not been reported-

- a. The Crowd Flow Study has not been based on the correct data and in particular the Study has not been based on the provision of adequate queuing space values.
- b. The proposed strategy would not work in events involving a hard finish – such as concerts.
- c. The temporary arrangements during the construction period would not provide safe and effective management of pedestrian flows on event days – and that the proposal needs to be revisited using confirmed queuing numbers. (our emphasis)

The issue of crowdfow is fundamental and cannot be conditioned.

The officers report has ignored several heritage assets and taken a different view to the Conservation Officer in places, meaning it is impossible for the Committee to properly understand the degree of harm as required by statute and policy

It is not at all clear whether the maximum parameters or the illustrative scheme have been assessed.

Reliance on the illustrative scheme rather than the maximum parameters.

Inconsistencies between the parameters and design codes mean that it is very difficult to assess harm.

Inconsistencies in the approach taken compared to THFCs Goods Yard and Depot proposals.

Omissions of analysis of some key heritage assets including the Grade II* Dial House.

No assessment has been provided of the worst-case maximum parameters and, based on the officer's advice, it is impossible to tell what this would be.

The flexibility sought in the application is too great to allow the likely significant effects to be properly assessed, there are simply too many potential outcomes that need to be considered and have not been.

At the reserved matters stage, the Council will have no means of making the Applicant provide any more than the minimums (of healthcare and employment space) and therefore that is what must be assessed and included in the planning balance. This has not been made clear to members of the Planning Sub-Committee

B2 and B8 uses are not included in the description of development and therefore cannot be relied on in the policy assessment.

The proposal deviates from the HRWMF and NT5 site allocation as it does not create a new leisure destination for London, nor increase the quality and quantity of community facilities proportionate to population growth

Density has not be calculated correctly and could be much higher

16th March letter received Daniel Levy (Chairman) summarises the key points raised in earlier objection letters received on 4, 14 and 16 March Appendix iii

16th March Objection from Arup- instructed by THFC Appendix iv

The ambition and commitment to communities and place that is embodied in the HRWMF and TAAP is lost in the current proposal. In my view, the application as it stands will not deliver the Council's aspirations for High Road West. It misses the opportunity to deliver good placemaking through truly mixed-use development appropriate to the proposed scale of homes and is unlikely to deliver good growth for North Tottenham. It is not aligned with the vision for a "vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham".

Officer note- the additional objections raised a number of detailed points which require further consideration.

CONSULTEE RESPONSE UPDATES

Final Transportation Comments are included at Appendix v.

Officer note- Further consideration of the matters raised is required.

NHS North Central London CCG Further response 16th March (appendix vi)

Suggest that a legal agreement should include a requirement for a healthcare delivery plan to be submitted with the Reserved Matters Applications for Phase 2 which would identify, in consultation with the Council and CCG the location of the new health centre, the timing of provision and the design and specification. We understand that the intention is to provide the new facility as shell and core floorspace and as such additional capital investment will be needed to fit-out the new facility. In addition, the future rental level should be affordable to the CCG.

Support the proposed s106 heads of terms to secure the new healthcare facility to be in operation prior to demolition of the existing Tottenham Health Centre and suggest that a healthcare delivery plan is needed to ensure the continuation of healthcare services and to ensure that the new health centre can be delivered, and additional capacity is provided to accommodate the additional demand generated by the development. Also suggest that there should be a mechanism to monitor and evaluate the construction impacts and mitigation measures to ensure that services delivered from the Tottenham Health Centre would not be disrupted during the construction stage.

There is an identified significant site-specific impact which requires direct mitigation by way of a s106 contribution in addition to the replacement health facility. The CCG has requested a contribution of £3,073,120 which could be reviewed as part of the suggested healthcare delivery plan.

Officer note- Further consideration of the matters raised is required.

TFL-

Whilst TfL is satisfied that the proposals are unlikely to have a significant impact on the strategic road network and we also accept the verdict of the Transport Assessment that no mitigation is required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. As a result, it is expected that a S106 total contribution of £2,275,000 would be required. However, TfL is open to discuss appropriate trigger points that fit with the phasing of this development

Other points to be address by condition are also raised.

Officer note- Further consideration of the matters raised is required.

Appendix 12: Plans and Documents List Amendments

The plans and documents listed should be amended as follows:

Supporting documents

- Affordable Housing Statement (dated October 2021)
- Arboricultural Impact Assessment (dated October 2021)
- Basement Assessment Impact (BIA) 1 of 6, 2 of 6, 3 of 6, 4 of 6, 5 of 6 and 6 of 6 (dated October 2021)
- Biodiversity Net Gain Design Stage Report (dated November 2021)
- Circular Economy Statement (dated October 2021)
- ~~Community Infrastructure Levy (CIL) – Form 1: CIL Additional Information (dated 2nd November 2021)~~
- Construction Environmental Management Plan (dated October 2021)
- ~~Covering Letter (dated 2nd November 2021)~~
- ~~Covering Letter (dated 1st February 2022)~~
- Crowd Flow Study (dated 3 March 2022)
- Delivery and Servicing Plan (dated October 2021)
- Design and Access Statement (dated October 2021)
- Design Code
- Detailed Circular Economy Statement (dated October 2021)
- Development Specification
- Economic Benefits Statement (dated October 2021)
- Energy and Sustainability Statement (dated October 2021)
- Environmental Statement Volume 1: Main Document (dated October 2021)
- Environmental Statement Volume 2: Figures (dated October 2021)
- Environmental Statement Volume 3: Heritage Townscape and Visual Impact Assessment (dated October 2021)
- Environmental Statement Volume 4: Chapter 2 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 7 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 8 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 9 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 10 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 11 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 13 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 14 Appendices (dated October 2021)
- Environmental Statement Volume 4: Chapter 16 Appendices (dated October 2021)
- Environmental Statement Volume 5: Non-Technical Summary (dated October 2021)
- Environmental Statement Addendum Volume 1: Chapters 01 – 018 (dated February 2022)
- Environmental Statement Addendum Volume 2: Chapters 01 – 018 Figures (dated January 2022)

- Environmental Statement Addendum Volume 3: Heritage Townscape and Visual Impact Assessment (dated January 2022)
- Environmental Statement Addendum Volume 4: Appendices Chapters 2, 7, 9,10 and 13 (dated January 2022)
- Environmental Statement Addendum Volume 5: Non- Technical Summary (dated January 2022)
- Equalities Impact Assessment (dated October 2021)
- Equalities Impact Assessment (dated 17 February 2022)
- Equalities Impact Assessment (dated 8 March 2022)
- Fire Safety Statement (dated October 2021)
- Financial Viability Assessment ~~Redacted For Publication~~ (dated 28th October 2021)
- Flood Risk Assessment (FRA) Part 1 of 9, 2 of 9, 3 of 9, 4 of 9, 5 of 9, 6 of 9, 7 of 9, 8 of 9 and 9 of 9 (dated October 2021)
- Framework Travel Plan (dated October 2021)
- Geotechnical & Geo- environmental Desk Study (dated October 2021)
- Health Impact Assessment (dated October 2021)
- HRW Advice Note Natural England – Habitat Regulations Assessment (dated January 2022)
- High Road West Crowd Flow Study (dated 8 February 2022)
- High Road West Policy NT5 and Arup Masterplan Note (dated 25 February 2022)
- Inclusive Design Statement (dated October 2021)
- Interim Scenario Equalities Impact Assessment (January 2022)
- Interim Scenario Rapid Health Impact Assessment (January 2022)
- Interim Scenario Site Suitability Noise Assessment (January 2022)
- Illustrative Area Schedule – Residential (dated October 2021)
- Lighting Masterplan and Planning Guides (dated October 2021)
- Operational Waste Strategy (dated October 2021)
- Planning Statement (dated October 2021)
- Planning Note (Dated 25 February 2022)
- Planning Note (dated 9 March 2022)
- Plot A Area Schedule (dated October 2021)
- Plot A TM59 Overheating Report (dated February 2022)
- Residential Travel Plan (dated October 2021)
- Response to Comments Letter (dated 28 February 2022)
- Retail Impact Assessment (dated October 2021)
- Site Suitability Noise Assessment (dated October 2021)
- Site Waste Management Plan (dated October 2021)
- Statement of Community Involvement (October 2021)
- Statement of Community Involvement Update (February 2022)
- Socio-Economic Benefits Statement (January 2022)
- Sunlight and Daylight Report (dated October 2021)
- Sustainability Statement (dated October 2021)
- Transport Assessment (dated October 2021)
- TM59 Overheating Assessment (dated October 2021)

- Utilities Statement (dated October 2021)
- Ventilation and Extraction Statement (dated October 2021)
- Whitehall Mews (Plot A) Design and Access Statement (dated October 2021)
- Whole Life Carbon Report (dated October 2021)
- Whole Life-cycle Carbon Assessment – Plot A (dated October 2021)

DETAILED	
Drawing Number	Drawing Title
HRWPA-PTE-A1-0-D-A-022000	Plot A - Building A1 - Plans - Level 0
HRWPA-PTE-A1-ZZ-D-A-022001	Plot A - Building A1 - Plans - Level 01-02
HRWPA-PTE-A1-ZZ-D-A-022002	Plot A - Building A1 - Plans - Level 03-04
<u>HRWPA-PTE-A2-ZZ-D-A-022003</u>	<u>Plot A - Buildings A2 - A3 - Plans - Level 0 - 01</u>
<u>HRWPA-PTE-A2-ZZ-D-A-022004</u>	<u>Plot A - Buildings A2 - A3 - Plans - Level 02 - 05</u>
<u>HRWPA-PTE-AX-ZZ-D-A-023000</u>	<u>Plot A - Building A1-A3 - Proposed Sections</u>
<u>HRWPA-PTE-AX-ZZ-D-A-033000</u>	<u>Plot A - Proposed Site Sections</u>
HRWPA-PTE-A1-ZZ-D-A-024000	Plot A - Building A1 Elevations - East and South
<u>HRWPA-PTE-A1-ZZ-D-A-024001</u>	<u>Plot A - Building A1 Elevations - West and North</u>
<u>HRWPA-PTE-A2-ZZ-D-A-024003</u>	<u>Plot A - Building A2 - A3 - Elevations - East and South</u>
HRWPA-PTE-A2-ZZ-D-A-024004	Plot A - Building A2 - A3 - Elevations - West and North
HRWPA-PTE-AX-ZZ-D-A-011000	Plot A - Site Plan - Level 0
HRWPA-PTE-AX-ZZ-D-A-011001	Plot A - Site Plan - Roof Plan
HRWPA-PTE-XX-ZZ-D-A-008000	Plot A - Existing Elevations & Section - 100 Whitehall Lodge
<u>HRWPA-PTE-AX-ZZ-D-A-011004</u>	<u>Plot A - Demolition Plan</u>
HRWPA-PTE-XX-ZZ-D-A-008001	Plot A - Existing Plan & Elevations - Community Centre
<u>HRWPA-PTE-AX-ZZ-D-A-011011</u>	<u>Plot A - Block Plan</u>
<u>HRWPA-PTE-XX-ZZ-D-A-000002</u>	<u>Plot A - Site Plan - Existing</u>
<u>HRWPA-PTE-XX-ZZ-D-A-008000</u>	<u>Plot A - Existing Elevations & Section - 100 Whitehall Lodge</u>
<u>HRWPA-PTE-XX-ZZ-D-A-008001</u>	<u>Plot A - Existing Plan & Elevations - Community Centre</u>
HRWPA-PTE-XX-ZZ-D-A-008002	Plot A - Existing Plans - 100 Whitehall Lodge
HRWPA-PTE-XX-ZZ-D-A-008003	Plot A - Existing Plan - Community Centre
<u>21-01-HRWPA-PTE-ZZ-ZZ-ZZ-L-A-0-5002</u>	Summary Schedule of Accommodation
HRWPA-SEW-ZZ-GF-D-L-007100	Plot A_Landscape General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007101	Kerbs and Edges General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007102	Boundaries General Arrangement
HRWPA-SEW-ZZ-GF-D-L-007103	Soft Landscape & Tree Planting Character Plan
HRWPA-SEW-ZZ-GF-D-L007200	Site Sections
HRWPA-SEW-ZZ-GF-D-L-007301	Typical Soft Landscape Details

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Our Ref: DW:100086.0017

14 March 2022

By e-mail only: Philip.Elliott@Haringey.gov.uk

Mr Philip Elliott
London Borough of Haringey

Dear Mr Elliott

High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)

We are instructed by Tottenham Hotspur Football Club (“THFC”). We write further to our letter 4 March 2022.

Following submission of our letter, our client was provided with an updated report entitled “High Road West Crowd Flow Study” prepared by Buro Happold (“the Crowd Flow Study”). The Crowd Flow Study was dated 3 March 2022 and was provided to our client by e-mail on 4 March 2022 timed at 17:04.

The Crowd Flow Study supersedes the earlier version dated 8 February 2022 and issued to our client by the applicant on the same day.

The Crowd Flow Study was published on the Council’s website in the week commencing 7 March 2022 but has not otherwise been advertised or formally consulted upon.

Our client and their professional advisors are reviewing the Crowd Flow Study but this requires proper time given the contents of the report and the importance of crowd flow safety issues to the Club, the Council and the wider community.

In our letter of 4 March we set out that the earlier draft of the Crowd Flow Study represented “any other information” for the purpose of the Town and Country Planning Environmental Impact Assessment Regulations 2017 (“the EIA Regulations”) and therefore it needed to be advertised and consulted upon in accordance with the prescribed requirements in Regulation 25.

On 9 March 2022, the agenda for the Council’s Planning Sub-Committee meeting on 17 March 2022 was published. The High Road West Application has been included on the agenda and an officer report published recommending approval of the application.

The officer report does not address any of the issues raised in our letter 4 March 2022 and specifically doesn’t anywhere address the status of the Crowd Flow Study and the need for further public consultation.

The EIA Regulations

We set out the relevant legal principles below.

Regulation 25(2) states that:

“Paragraphs (3) to (11) apply in relation to further information and any other information except in so far as the further information and any other information is provided for the purposes of an inquiry or hearing held under the Act and the request for the further information made pursuant to paragraph (1) stated that it was to be provided for such purposes” (emphasis added)

Regulation 25(3) states:

“The recipient of further information pursuant to paragraph (1) or any other information **must** publish in a local newspaper circulating in the locality in which the land is situated a notice stating—

- (a) the name of the applicant for planning permission or subsequent consent or the appellant (as the case may be) and the name and address of the relevant planning authority;
- (b) the date on which the application was made and, if it be the case, that it has been referred to the Secretary of State for determination or is the subject of an appeal to the Secretary of State;
- (c) in the case of a subsequent application, sufficient information to enable the planning permission for the development to be identified;
- (d) the address or location and the nature of the proposed development;
- (e) that further information or any other information is available in relation to an environmental statement which has already been provided;
- (f) that a copy of the further information or any other information and of any environmental statement which relates to any application for planning permission or subsequent application may be inspected by members of the public at all reasonable hours;
- (g) an address in the locality in which the land is situated at which the further information or any other information may be inspected and the latest date on which it will be available for inspection (being a date not less than 30 days later than the date on which the notice is published);
- (h) details of a website maintained by or on behalf of the relevant planning authority on which the further information or any other information may be inspected, and the latest date on which they will be available for access (being a date not less than 30 days later than the date on which the notice is published);
- (i) an address (whether or not the same as that given pursuant to sub-paragraph (g)) in the locality in which the land is situated at which copies of the further information or any other information may be obtained;
- (j) that copies may be obtained there so long as stocks last;
- (k) if a charge is to be made for a copy, the amount of the charge;
- (l) that any person wishing to make representations about the further information or any other information should make them in writing, before the latest date specified in accordance with sub-paragraph (g) or (h), to the relevant planning authority, the Secretary of State or the inspector (as the case may be); and
- (m) the address to which representations should be sent.” (emphasis added)

Regulation 25(7) provides that where “any other information” is provided, the local planning authority “must suspend determination of the application” and “must not determine it in before the expiry of 30 days after the last of the publication requirements has been complied with.”

Regulation 2 defines “any other information” as

“any other substantive information relating to the environmental statement and provided by the applicant or the appellant as the case may be”

Regulation 18(3)(b) provides that an environmental statement is a statement which includes at least “a description of the likely significant effects of the proposed development on the environment”.

In turn Regulation 18(4)(b) provides that an environmental statement must “include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment”.

The Environmental Statement

The applicant submitted a request for a Scoping Opinion which acknowledges that the “likely significant effects of the development” include:

- The effect upon pedestrian and cyclist access (delay, amenity and intimidation);
and
- The effect on pedestrian cycling facilities and permeability through the site with improved pedestrian/cycle access through the site.

Paragraph 6.1.7 of the submitted Environmental Statement states:

“The development of plots within Phase 1B, 2 & 3 will in particular need detailed reviews with both THFC and the Met Police in terms of crowd management, crowd flow and public safety and security. This will likely involve THFC’s Blue Book (Operational Guide to Event Days)”

In turn paragraph 15.4.1.7 of the submitted Environmental Statement states:

“It is acknowledged that demolition and construction operations will have a temporary impact upon event day crowd flow operations to/from the THFC Stadium. Spectator connections to/from White Hart Lane Station may be temporarily diverted during phases of works, albeit managed through the Outline CEMP and agreement with local stakeholders.”

Paragraph 15.4.2.8 states:

“In regard to crowd flow and event operations at THFC Stadium, the Proposed Development will deliver a direct pedestrian connection and sufficient queuing capacity to/from White Hart Lane Station responding to the key desire line between the Stadium and Station. The likely effect on receptors (pedestrians, cyclists - medium sensitivity) is expected to be a permanent, direct, long term, local effect of minor beneficial significance.”

The Crowd Flow study purports to assess how crowd flows through the application site can be accommodated and contains detailed modelling to assess the capacity through the site and in respect of queues at White Hart Lane Station.

The following conclusions can be drawn:

- i. The applicant has acknowledged that the effect of pedestrian access through the site is a “likely significant effect” of the application scheme;

- ii. In accordance with Regulation 18(4)(b), the Environmental Statement must contain all the information reasonably required for the Council to reach a conclusion on the significant effects – this is a mandatory requirement;
- iii. The Crowd Flow Study plainly represents “substantive information” relating to a significant effect identified by the applicant and relating to the Environmental Statement – it therefore constitutes “any other information” for the purpose of the EIA Regulations;
- iv. As “any other information” the Council must comply with the requirements of Regulation 25(3) – this is a mandatory requirement
- v. In turn the Council must suspend determination of the application and must not determine it before the expiry of 30 days following compliance with the prescribed publicity and notification requirements in Regulation 25(3) – this is a mandatory requirement.

The Council has not yet complied with these mandatory requirements and will not have time to do so before the Planning Sub-Committee meeting on 17 March. The determination of the High Road West Application at that meeting would therefore be unlawful.

As set out above the Crowd Flow Study is a matter of great importance to the Club and other stakeholders. The Club and other parties, need proper time to review and respond to it. Given the technical nature of the study we would have thought it obvious that making it available on 4 March does not provide sufficient time for any interested parties to consider it and provide full comments in advance of 17 March.

Please would you confirm by return that the determination of the High Road West Application will be removed from the Planning Sub-Committee agenda for the meeting on 17 March and that the Crowd Flow Study will be formally publicised and consulted upon in accordance with the mandatory requirements of the EIA Regulations.

Yours sincerely



RICHARD MAX & CO

1. Summary

- 1.1 Movement Strategies has undertaken a review of the **High Road West Crowd Flow Study** prepared by Buro Happold for Lendlease (4th March 2022) on behalf of Tottenham Hotspur FC (THFC). This note sets out a series of findings from the review, but three key findings have been highlighted here:
1. The Crowd Flow Study is based on a plan that directs egressing spectators for Northbound rail services via Moselle Square instead of White Hart Lane. This would introduce conflicting flows at the junction of White Hart Lane and the High Road in the vicinity of the temporary HVM barrier, and is not acknowledged in the study report. **This increases the crowd safety risk at this key location, and requires further discussion and justification given THFC's Zone Ex responsibilities.**
 2. In 2016, THFC supplied a briefing note (drafted by Movement Strategies) on event day crowd movement requirements as part of the High Road West Masterplan procurement process. **This information is not referenced in the Crowd Flow Study and as such there is no attempt to describe why the proposals deviate from this.**
 3. There are a number of clear examples where the Crowd Flow Study has either provided limited detail or remains silent on key aspects associated with event day demand, capacity or operations. Our concerns are aligned with those of the Council's Independent Crowd Advisor (Dr Jim Dickie – High Road West, 9th March 2022). **Therefore, the plans and associated assessments do not provide sufficient confidence that THFC would be able to carry out their Zone Ex responsibilities in all circumstances.**
- 1.2 In general, it is understood that there has been limited co-ordinated engagement by Lendlease and Buro Happold with THFC and other stakeholders engaged in event day crowd and transport operations. Without the engagement and transfer of knowledge prior to undertaking the study, there are many key factors and considerations missing or not fully addressed.

2. High Road West and Zone Ex

- 2.1 On event days at the Tottenham Hotspur Stadium, the Guide to Safety at Sports Grounds (SGSA, v6, 2018) indicates that the venue operators have a responsibility for assurance of the safety of attendees within Zone Ex (the area in the public domain considered to encompass the main pedestrian and vehicle routes leading from the venue perimeter to public car parks, local train stations, bus stops and so on). The responsibility is to ensure that all stakeholders with a role in supporting the delivery of this outcome are to be engaged and that the measures put in place are implemented in a co-ordinated and consistent way. The stakeholders include emergency services, local authorities and, where appropriate, local landowners.
- 2.2 The area covered by the High Road West Masterplan and LendLease application falls within the Zone Ex area. As such, THFC has accountability for crowd movement within this footprint and needs to be confident that the space available to manage event day crowds is adequately sized and laid out to accommodate safe and effective operations in all foreseeable scenarios. Ultimately, if there is deemed to be a failure in assuring the safety of spectators within Zone Ex it could lead to reductions in the licensed capacity of the venue. One implication of this not being delivered through design wherever possible will be a potential for increased and extended event day staffing requirements, which has a direct economic impact to THFC. Another potential implication is effectiveness

with which THFC can deliver their obligations through their Local Area Management Plan to mitigate the impact of major events on the local community.

- 2.3 There has been no engagement by Lendlease with THFC on this matter prior to the planning submission. The planning documentation was the first opportunity afforded to THFC to understand the proposals for the High Road West Masterplan area. This does not fit with the long term responsibility that THFC (or indeed LendLease) will have for Zone Ex.

3. Crowd Flow Study: Key Themes from the Review

- 3.1 The first **Crowd Flow Study** prepared by Buro Happold for Lendlease was only issued in February 2022 (3 months after submission of the application). A subsequent update to the report was issued on 4th March 2022. Neither version has been subject to full public or stakeholder consultation. As this is our principal source, the remainder of the comments are related to the content of that report. Further analysis and assessment of the Crowd Flow Study is required, as well as discussions with all stakeholders, but we set out our initial comments below.
- 3.2 There are three key themes that emerge from our initial review of this document:
- The Crowd Flow Study does not sufficiently cover the demand scenarios that may be anticipated to occur on an event day, and therefore cannot conclude that the masterplan design is adequate.
 - The Crowd Flow Study does not adequately address the event day crowd management requirements and the impact that the design proposals have on wider Zone Ex crowd safety and operational flexibility.
 - The crowd and queuing analysis presented in the document cannot be sufficiently sense-checked based on the content of the document alone, so it is not possible to verify the outcomes and resultant conclusions.
- 3.3 These three themes will be considered in turn, cross-referencing the findings of the review undertaken by the Council's Independent Crowd Advisor in parallel where appropriate (Dr Jim Dickie, High Road West, 9th March 2022).

4. Demand Scenarios and Omissions

- 4.1 In advance of the bidding process for the High Road West development, THFC commissioned Movement Strategies to produce a briefing note for those interested parties (including Lendlease) on event day crowd movement associated with the new Stadium. This document - *Fixed Design Parameters for THFC Stadium/WHL Station Link* – included a series of spatial requirements, including dimensions for routes and dwelling areas. Other than an acknowledgement of the document in Appendix A, there is no mention of the guidance in the Buro Happold Crowd Flow Study and therefore the deviations from the items highlighted in this guidance have not been justified.
- 4.2 The Crowd Flow Study focuses on football event day scenarios. Whilst this is the most frequent occurrence, it is not necessarily the most onerous in terms of the movement and management of spectators. There is no consideration of concert scenarios and a small sub-section that has been recently introduced to consider a 'boxing scenario'. It is noted that the boxing analysis references the planning assumptions for the 2021 boxing event, but does not reflect actual evidence of behaviours captured at that event. We know that there was increased southbound demand for travel at White Hart Lane Station with a 'hard finish', so it would be appropriate to factor in that evidence. Dr Dickie clearly states (p17 of his report) that these exceptional scenarios have not been addressed.

- 4.3 The initial version of the Crowd Flow Study only covered the 'End State', with no assessment of the requirements to manage crowds during the Construction and Build-Out period. As this is programmed to extend for at least ten years, this is a critical aspect to be addressed. The subsequent issue of the document (4th March) did include a new section associated with Crowd Flow during construction phasing, but this only considered two potential scenarios and only assessed the post-match queueing associated with a football event. This does not provide confidence that the full range of anticipated outcomes have been considered. There is also no mention of the impacts of construction on pre-event ingress flows.
- 4.4 The impact of engineering works on the rail network is not addressed. Planned blockades and restricted service running have affected a number of event days at the stadium, not to mention the unplanned disruptions that also occur. The impact of such scenarios and the spatial and operational consequences have not been considered at all. Discussion around the need to assess 'What if...' scenarios is also raised by Dr Dickie on p11 of his report. This is a key omission.

5. Operational Considerations

- 5.1 The event day operations in this area have evolved since the new Stadium opened in April 2019 and there is a wealth of knowledge about variation in crowd conditions and behaviours in the 'Last Mile' that can be used to support the design. The Crowd Flow Study references two site observations in late 2021 as the evidence base, which suggests that the understanding of operational aspects underlying this study is limited.
- 5.2 Crucially, the Crowd Flow Study is focused on normal egress operations and associated flows and queues. There is no consideration of the crowd flow and safety impacts should there be an emergency or incident that requires the queues to be dispersed or the station cleared (the southbound platform in particular). This would also feed into construction phasing – the proposed design must maintain adequate provision for dispersal and not only the space for queueing itself.
- 5.3 There is an underlying assumption within the analysis that egress flows to the northbound platform are re-directed through the Masterplan area (Moselle Square). This would increase the safety risk to spectators by introducing conflicting flows at the High Road/White Hart Lane junction, which is currently managed to avoid this, particularly in the vicinity of the temporary HVM. There would also be a need for THFC to make upstream changes to circulation on the Podium, which for certain matches is just not possible due to segregation measures. Given that this fundamental change to a key part of THFC's crowd management strategy will affect the safety risk profile, there is no clear justification in the Study nor presentation of mitigations. As indicated earlier, it would also be expected that any variation would require dialogue, analysis and debate with THFC. This matter is also discussed on p10 of Dr Dickie's report.
- 5.4 The study does not make any remark on the movement of those with mobility impairments, including wheelchairs, and the extent to which the proposals support their safe and efficient movement on an event day.
- 5.5 The study report identifies additional facilities within the footprint of the Masterplan, most notably toilets. It is not clear who the facilities are for and where precisely they are suggested. If they are intended to support spectators then additional work needs to be done to look at placement as for the majority of this footprint egressing spectators will be in a queue system and placing toilets inappropriately will create counter-flows and associated risks. The event day operational know-how should be used to inform the provision of any permanent facilities within the design. This equally applies to permanent planters and landscaping elements. The study indicates that they can be accommodated and serviced within the footprint from a capacity perspective, but there is no discussion about how they fit with event day operations and maintaining flexibility for management of different scenarios.

- 5.6 There is a general lack of awareness demonstrated in the study of the key factors that influence behaviours and how these are addressed in the proposed plans. These range from aspects associated with the variation in train frequency and station operations to the make-up of the crowd and their motivations – for example the differences as a result of the finish times of matches, the knowledge of the transport options available and how this affects demand at White Hart Lane station and more direct influences such as consumption of alcohol and the gender and age demographics of the crowd. Such variations may appear subtle on paper but can give rise to significant crowd safety issues in reality if not properly understood.

6. Verification of Analysis

- 6.1 Many of the input assumptions around spectator behaviour are taken from the 2015 Transport Assessment - assumptions made before the Stadium was opened. Furthermore, that assessment was based on the current situation at the time (previous Stadium and previous Transport network configuration) and then indicating what mitigations were necessary to accommodate the uplift in capacity. Using actual data on observed behaviours associated with the new Stadium would be a much more sound basis for this, and THFC has collected data of this nature through its own monitoring activities. This is discussed by Dr Dickie on p11 of his report.
- 6.2 There is no justification for the choice of the flow rates and queue density parameters that have been used to 'test' the space. There is no specific reference to the crowd conditions observed on site or justified as appropriate for post-event egress.
- 6.3 The 'available' space assumed for queuing in the design considers the entire footprint of an area, and does not address that the reality of operating a queue system will mean that it will not be possible to use the entirety of the space. An assessment considering a queue system determined by a minimum width may be more appropriate given that it will likely be served by temporary barrier arrangements.
- 6.4 The analysis is a combination of static analysis and Legion modelling. The nature of the Legion simulation is that it would require a 'hands on' review of the model in order to verify the outputs – Dr Dickie also discusses the interrogation of these models on p12 of his report. Nevertheless, the output presented looks questionable. The whole of the queuing area does not exceed LoS D, even though the queue changes width throughout its length, and there is no change in density shown at the narrower points. There is also no clarity on the level of detail that is shown (is it the peak 5 mins, 15 mins, whole egress period?). The ability to rely on the conclusions drawn from this are therefore also open to question.
- 7.1 Based on the initial review undertaken, there are a series of concerns associated with the proposals for the High Road West in relation to event day crowd movement. Given their responsibilities for crowd safety within the Zone Ex set out in the Guide to Safety at Sports Grounds, THFC need to be assured that they can deliver safe and efficient operations in this space, both in its 'end state' and during construction. We do not currently consider that submitted Crowd Flow Study has demonstrated that safe and efficient crowd flow operations can be provided during the 10-year construction phase and also during the 'end state'. Given the fundamental impacts to THFC's operation, the potential impacts on spectator safety risk profile and the lack of clarity provided in the planning documents, further engagement, information and assessment is necessary to provide this assurance prior to approval.**

APPENDIX 2 OFFICER'S REPORT REVIEW OF HERITAGE MATTERS

Para	Statement	Comment
13.20	The officer assessment below draws on the findings of the ES.	No mention of the Conservation Officer's response. The Conservation Officer did not agree with the ES in all respects. There is no clarity about where the case Officer disagrees with the Conservation Officers, or why.
13.24	No. 34 White Hart Lane (Listed Grade II). The nearest proposed plots to the building are the I plots. The ES concludes that the proposal would have a minor beneficial impact as a result of the demolition of nos 24-30 White Hart Lane and public realm improvements within its setting. Officers concur that the proposal would have a minor beneficial impact on the setting of this building.	Note comments on Conservation Officer's response in the table above. This beneficial impact directly contradicts the Conservation Officer's response. It says nothing of the "overwhelming impact" identified by the Conservation Officer.
13.43	"743 – 759 High Road (Locally Listed). The ES notes that the former public house has been subject to alteration, is of limited interest and is proposed for demolition."	Only the corner pub at 759 is covered. There is no indication whatsoever that this assessment covers the wholesale demolition of a whole street block of 9 separate locally listed buildings.
13.45	No. 790 High Road (Dial House) (Grade II* listed) "officers consider that these proposed tall buildings would cause 'less than substantial harm' to its setting and significance."	Conservation Officer's response was silent about this building (as with many others noted in the Case Officer's report)
13.48	"Overall, it is considered that the proposed development would result in less than substantial harm in the mid-lower range."	But we can see from the Conservation Officer's response that she considered the harm to be "the mid-range of 'less than substantial'" in the illustrative "most heritage-sympathetic configuration". There is a clear discrepancy. On what basis is this impact on many heritage assets revised to a lower level, and what is being assessed (illustrative/max parameters)?
13.49	"Summary. Having carefully considered the proposals, including the findings in the applicant's ES, the Conservation Officer considers that the proposed towers would cause	But this is misleading. There are extensive discrepancies between the Conservation Officer's response and the Case Officer's report. Some heritage assets are assessed by the Case Officer which the Conservation Officer did not assess at all. Some assessments differ. Not once does the Case Officer communicate the

Para	Statement	Comment
	<p><i>'less than substantial harm' to the setting and significance of the above designated and non-designated heritage assets considered together and that, having considered the specific impact of the proposed development on each relevant heritage asset, the prevailing level of harm would be at the mid- lower range of 'less than substantial'"</i></p>	<p>"overwhelming impact" identified by the Conservation Officer, or the concerns regarding the maximum parameters. It is not at all clear whether the Case Officer assesses the maximum parameters or the illustrative scheme.</p>

APPENDIX 3 CONSERVATION OFFICER'S RESPONSE

Page	Statement	Comment
5	<i>"The characteristic features, sensitivities and opportunities offered by the Conservation Area as well as the need to preserve its primacy and consistent legibility along the High Road have been <u>amply discussed at pre-application stage...</u>"</i>	This point is relevant to the viewpoints that were selected – none of the more exposed views from Tottenham Cemetery
5	<i>"While maximizing the opportunities for creating new access into the site through the Conservation Area frontage along White Hart Lane which will benefit from <u>high quality</u> new development to complement the surviving listed and locally listed buildings there located. At the outset, <u>the illustrative site plans</u> present to many extents a contextually coherent development proposal which is broadly supported from the conservation standpoint."</i>	Neither the quality of the development can be commented on, and nor do the illustrative plans ultimately form the basis for robust decision making, given their conflicts with the parameter plans, specifically in relation to the heritage assets. The assessment here is clearly on the basis of the illustrative scheme.
5	<i>"The proposed gradual increase in built scale and height from east to west is welcome and supported from conservation grounds as this strategic mass and height allocation is successfully designed to mitigate the potentially overwhelming jump in scale between the two-three storey Conservation Area and the new development with its large buildings and tall towers peripherally located by the western boundary of the development site."</i>	But the response ignores the "overwhelming jump in scale between the two-three storey Conservation Area" buildings on White Hart Lane and the towers of the proposal to the south of WHL. If this "overwhelming jump in scale" is harmful and important to avoid, then the Officer ignores that altogether.
6	<i>"The submitted townscape views further help to understand the specific proportional and <u>architectural relationship between each proposed blocks and neighbouring heritage buildings</u> and related Conservation Area."</i>	The townscape views show maximum parameters and illustrative breakdowns. It is not possible to understand any architectural relationships from the max parameter plans.
6	<i>"Focusing on the immediate relationship between proposed new development Plots and surviving heritage assets, the proposed illustrative and maximum parameters outline the range of possible impacts of the proposed development on several heritage assets and ultimately provide <u>a useful indication of the most heritage-sensitive massing and height</u></i>	What is the basis for the assessment, the illustrative breakdowns or the maximum parameters. There is no such a thing as "illustrative parameters".

Page	Statement	Comment
	<i><u>options which are often achieved with the illustrative parameters in such a heritage-sensitive context."</u></i>	
6	<i>"It is <u>unclear at this outline planning stage</u> how the proposed Plots H and I immediately surrounding the listed building at the back and to the eastern flank off the grade I listed building will related to one another and to The Grange in architectural, landscape and spatial terms and it <u>is also unclear at this stage what type of improvements or alterations, if any, will benefit The Grange.</u> ... while these illustrative new Plots may constitute the maximum acceptable built quantum in such sensitive setting, <u>the implementation of the proposed maximum parameters would very likely raise concerns about the overwhelming impact that a coalescing group of bulkier, taller and more imposing new buildings would have on The Grange and on this stretch of the Conservation Area.</u>"</i>	<p>We have from this, in relation to The Grange and the CA:</p> <ol style="list-style-type: none"> 1. Lack of clarity about impacts. 2. Lack of clarity about the type of improvements – and indeed whether there would be any improvements. 3. Identification of an "overwhelming impact". <p>There is no conclusion here about benefits to The Grange, only harm.</p>
6	<i>"While the site layout and the potential landscape and architectural aspects of the development proposal surrounding The Grange is positive and welcome in principle, the national importance of the listed building would require a higher level of definition of the proposed developments at Plots H and I directly impacting on its immediate surrounding to achieve the most appropriate development response which can be certainly guided by this masterplan scheme, but is fundamentally deferred to a future detailed application where the optimal design response to The Grange and to this stretch of the Conservation Area will be sought."</i>	<p>Here we have as positive the</p> <ol style="list-style-type: none"> 1. site layout and 2. the potential landscape and architectural aspects <p>The rest is indeterminate at this stage.</p>
6 & 7	<i>At No 7 White Hart Lane "the potential for a maximum scale, massing and height of development which risk to overwhelm the small scale, two storey height of the listed house, whose street presence and townscape legibility are already impaired by the recessed building line. The listed building will be flanked by a new building that depending on the plan form,</i>	A harmful impact anticipated in relation to the maximum parameters.

Page	Statement	Comment
	<p><i>mass and height configuration could constitute a relatively gentle, heritage-sensitive and acceptable transition in scale as per illustrative parameters, but greater heights and masses may prove harmful and will have to be carefully considered and assessed at detailed application stage ... The national importance of this listed building requires a much greater level of design definition of the proposed development to fully appreciate its relationship with the heritage asset, but this outline proposal seems already to confirm that building according to the proposed maximum parameters for Plot G is potentially harmful to the character and significance of the listed house and its Conservation Area."</i></p>	
7	<p><i>"The Code and suggested architectural approach are inconsistent with the current maximum parameters and risk to be ineffective as no architectural treatment and finishes can successfully mitigate the impact of excessively tall new blocks in the immediate vicinity of heritage assets."</i></p>	<p>Identification of harm in relation to the parameters, which is what the Council needs to assess, and conflict between the Design Code and the parameter plans.</p>
8	<p><i>"the proposed replacement of the locally listed and neighbouring Victorian terraces comprised between Moselle Place and Brereton Road with Plots E and C should still be considered as an opportunity to reconnect the broken historic frontage of the Conservation Area and to raise the quality of its setting through high quality, context sensitive new development and a higher degree of definition of the proposed Plot E is necessary to ensure its proportions and design quality outweigh the loss of the local heritage terrace part of the original street frontage"</i></p>	<p>Harm due to the loss of the locally listed buildings. Not enough definition of Block E to outweigh that harm at this stage.</p>
8	<p><i>"Looking at the proposed development scheme in its complexity and richness"</i></p>	<p>There is no basis on which to make an assessment of "richness". Only the maximum parameters.</p>
8	<p><i>"elements of various heights which will intrude to various degree in the background of established views from and towards Conservation Areas and heritage assets, the potential new development configured"</i></p>	<p>The parameters, which the Council is assessing here, would "appear in most instances as coalescing and <u>overwhelming</u> for the historic built environment in several views into and across the impacted"</p>

Page	Statement	Comment
	<p><i>according to the proposed maximum parameters would instead appear in most instances as coalescing and overwhelming for the historic built environment in several views into and across the impacted Conservation Areas. This seems one more reason to carefully refine the parameter plans and Design Codes for the proposed development refining the design guidance in relation to heritage assets"</i></p>	<p>Conservation Areas". This cannot be construed as anything other than harmful.</p>
8	<p><i>"26 accurate visual representations whose viewpoints have been agreed during the preapplication process"</i></p>	<p>Why then, for a smaller scheme on a significantly smaller site, were 29 views required for the Goods Yard + Depot Scheme? This is an inconsistent approach.</p>
9	<p><i>"The following views show the overwhelming effect of the proposed development on the character and experience of the Conservation Areas and heritage buildings ..."</i></p>	<p>Wholly inconsistent approach. No discussion of the Bruce Castle or Tottenham Cemetery CAs. Extracts below from the response to the Goods Yard + Depot Scheme, none of which made it into the response to the LL scheme:</p> <p><i>"Bruce Castle and All Hallows Conservation Area has considerable historic and architectural significance and includes three important historic buildings – Bruce Castel (Listed Grade I), All Hallows Church (Listed Grade II*) and The Priory (Listed Grade II*). The applicant's assessment suggests that the existing Rivers Apartments tower located to the north-west of the development site and outside the Conservation Area, is already seen from the park and that the proposed scheme would not bring about a particularly noticeable change to the perception of the urban setting of the park. This position ignores that the proposed towers, especially the Goods Yard towers would very uncharacteristically stand out and be prominent features when viewed from the open spaces in the Conservation Area, which is characterised by its openness, landscaping in the park and small-scale development in long views. It is our opinion that the proposed development would dominate the surrounding of the Conservation Area and would negatively impact on its experience.</i></p> <p><i>Tottenham Cemetery Conservation Area is similarly impacted by the tallest elements of the new development since the proposed towers, especially those standing n the Goods yard site, would</i></p>

Page	Statement	Comment
		<p><i>uncharacteristically dominate in the views across the Conservation Area, especially those views taken from the northern section of the Tottenham Cemetery which is characterised by open spaces, landscaping in the park and small-scale development in long views. It's therefore felt that the proposed tall buildings would cause 'less than substantial harm' to the setting and significance of this Conservation Area.</i></p> <p>...</p> <p><i>As part of the current development proposal both council officers and applicants have visited and analysed in depth the characteristic features and experiential quality of these Conservation Areas and have been able to appreciate how especially the Bruce Castle Park and the northern section the Tottenham Cemetery are large, landscaped areas with a high level of public fruition and with a good degree of visual connection with the surrounding mainly low rise, traditional built environment that significantly constitutes the visual background of views across the Conservation Areas and therefore significantly contributes to the peaceful, open and landscaped character of the Conservation Areas.</i></p> <p><i>Current view 16 clearly shows the imposing of the proposed towers in views across the Bruce Castle Conservation Area where the trees and nature in general is the domineering, tallest element that blends in with the sky above. Existing buildings appear in the view as subordinate to the landscape, are not imposing architectural gestures such as the tall towers, and in the light of these considerations it is very difficult to accept the position of the applicant's heritage statement that this view across the Conservation Area are not significant just because these are not marked up in the adopted Conservation Area Appraisal, as this would totally ignore that the whole experience of the Conservation Area is a dynamic one and depends on what we see and perceive when we move throughout the area, and view 16 is taken from a junction of paths which lead from the park playground to the northern access to the park, so it's not a secondary or negligible viewpoint in the experience of the park and Conservation Area.</i></p>

Page	Statement	Comment
		<p><i>Submitted views 18, 19, 20 respectively show how the new development will be uncharacteristically and prominently visible across the northern section of the Tottenham Cemetery, a place of prayer and peace, but also a public space for families and children where the current views are those of the graveyards, rich vegetation, trees and the sky. It is again difficult to accept the applicant's position that the development retains the character and appearance of the Conservation Area and has no or minor effect as suggested in the submitted reports."</i></p> <p>None of this was noted in relation to the LL scheme. The Conservation Officer's response does not even mention Tottenham Cemetery CA, aside from noting how the ES assessed it. It simply cannot be said that the two applications have been treated in a consistent way, especially when considering the fact that no open views from Tottenham Cemetery were required of LL, and the views of the LL scheme from Bruce Castle are significantly more impactful for the LL scheme (as would be Tottenham Cemetery).</p>
9	Omission of Grade II* Dial House	<p>No impact identified arising from LL, even though this scheme would demolish part of the <i>"well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road"</i> (see below). No views were produced to show the impact of the scheme from the south of this listed building. In relation to the Goods Yard + Depot Scheme, this is how the Officer commented:</p> <p><i>"Grade II* Dial House, located at 790 High Road is the bookend house to the highly significant Northumberland Terrace, as a prominent and valuable corner building in the Conservation Area <u>it benefits even more than others from the well-preserved urban scale and architectural quality of its immediately surrounding stretch of High Road</u> and the proposed Goods Yard towers would definitely dominate in those views of the historic frontage of North Tottenham Conservation Area taken from Dial House, submitted northwards looking views of the High Road show how the proposed towers, especially those on the Goods yard site, would <u>partially obscure the legibility and primacy of the continuous historic roofscape along the west side of the High Road</u> [the LL scheme would physically destroy some of this] and would loom above the</i></p>

Page	Statement	Comment
		<p><i>historic buildings views from Dial House, thus adversely affecting the contributing setting of this important building."</i></p> <p>This shows a wholly inconsistent approach to assessment and harm, which is incompatible with an even-handed approach.</p>
9	<p>Conclusions <i>"This development will significantly change and improve the urban environment of North Tottenham but will also change the immediate surrounding where we experience heritage assets and their views. <u>Even in their illustrative, most heritage-sympathetic configuration</u> the tallest elements of the new development dominate to various degrees in the background of currently undeveloped, or modestly developed, uncluttered open views towards the development site as experienced from various standpoints including Bruce Castle Park, from White Hart Lane, from Northumberland Park and along the High Road. This would lead to a level of harm at the mid-range of 'less than substantial' affecting several designated and undesignated heritage assets and the tests set at paragraphs 196 and 203 of the NPPF will apply."</i></p>	<p>The overall conclusion of <i>"the mid-range of 'less than substantial'"</i> harm is clearly based on the <i>"illustrative, most heritage-sympathetic configuration"</i>. It is clear that no overall conclusion has been made in respect of the maximum authorised parameters.</p>

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16 March 2022

By e-mail only: Philip.Elliott@Haringey.gov.uk

Mr Philip Elliott
London Borough of Haringey

Dear Mr Elliott

High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)

We are instructed by Tottenham Hotspur Football Club (“THFC”). We write further to our letters dated 4 and 14 March 2022 and in response to the Officer’s Report to the 17 March 2022 Planning Sub-Committee (“the OR”).

We note that we have not yet received a response to the issues raised in our letter of 14 March regarding the failure of the Council to comply with the requirements of the Town and Country Planning Environmental Impact Assessment Regulations 2017.

The OR (including Appendix 3 and others subsequent updates) has failed to properly and fairly set out all the issues within THFC’s representations for members’ consideration and has failed to address the fundamental concerns raised. Furthermore, the reasoning in the OR perfectly illustrates the concerns which THFC and others have expressed in relation to the High Road West Application in respect of crowd flow safety, the assessment of the impact of the proposals in heritage terms, and numerous other material issues.

The concerns we have previously raised are not simply ones of planning judgment but matters of law. If the Council proceeds to determine the High Road West Application on the basis of the OR as currently drafted it will have fallen into legal error. The only way to avoid this is for the Council to withdraw the High Road West Application from consideration by the Planning Sub-Committee on 17th March, to properly consult upon the Crowd Flow Study, to allow our client (and other interested parties) time to properly consider the crowd flow information and for the Council to then respond to the numerous issues THFC have raised.

1. Crowd Flow & Safety

The very late provision of the Crowd Flow Study has meant that THFC, and other stakeholders including the emergency services, have been provided with very little time to properly consider the impact of the High Road West Application on the operation of the Tottenham Hotspur Stadium and in particular, the management of crowd flows associated with major events. As set out in our 14 March letter this is completely unsatisfactory given the importance of the issues, procedurally flawed and unlawful.

Criticism is made in the applicant's response to THFC's representations, that the THFC has not been willing to engage with the applicant or the Council on this matter. This is factually incorrect and wholly misleading. For completeness we would make the following points clear:

- THFC provided the Council with clear guidance on crowd flow requirements on 19 July 2016 to pass on to HRW bidding parties, which included the Applicant;
- The Applicant did not undertake nor seek to undertake any pre-application consultation with THFC regarding crowd flow issues;
- The Applicant did not provide any crowd flow modelling or assessment within the original High Road West Application documentation;
- THFC understands that the Applicant did not commission any analysis from consultants until a matter of days before the HRW Application was submitted¹;
- The first meeting took place on 29 November 2021 in response to THFC expressing its written concern that the Applicant had not consulted with it in respect of crowd flow issues;
- THFC submitted an initial holding representation highlighting the lack of any detailed crowd flow assessment on 20 December 2021 within the original consultation period on the application;
- A further meeting was held on 24 January 2022 with the Applicant but no formal crowd flow information or assessment was presented at either meeting. At the meeting on 24 January the Applicant advised that detailed information was to be provided in due course;
- The initial draft of the Crowd Flow Study was only provided to THFC on 8 February 2022 – a week later than the start of the re-consultation on the amendments to the application;
- The final complete Crowd Flow Study was only provided to THFC on 4 March 2022 – only three working days before the OR was published;
- The Council's independent review of the Crowd Flow Study, prepared by Dr Dickie was only published on 9 March and refers to other documents prepared for or by the applicant which have only been made available earlier today and which, quite understandably, THFC has not yet had the opportunity to review.

The OR dedicates just two paragraphs to crowd flow matters (9.27 and 9.28) where members are advised that any issues arising in respect of crowd flow safety can be secured by planning condition (albeit no such draft condition is set out for consideration). The OR fails to properly and fairly explain to members the real significance of the issue, the safety risks involved and the actual advice given to the Council by its own consultant, Dr Dickie.

In the limited time available THFC has commissioned its own advisors to review and comment upon the Crow Flow Study. We now attach as **Appendix 1** an initial response from Movement Strategies on behalf of THFC.

Movement Strategies identify a number of errors and omissions in the Crowd Flow Study and highlight a number of concerns including:

- The proposals will increase the crowd safety risk by introducing conflicting flows at the key junction of White Hart Lane and the High Road the road is constricted by counter-terrorism equipment.

¹ Email correspondence to Planning Officers from THFC, dated 21 October, flagged that there had been no engagement on the operation of the Stadium including crowd flow etc. and that there had been no meaningful engagement with the Club on the composition of the proposals whatsoever.

- The Crowd Flow Study has failed to properly reference and consider the information provided to the Council by THFC (prepared by Movement Strategies) to inform the procurement process in July 2016.
- The Crowd Flow Study does not sufficiently address all the demand scenarios that may reasonably be anticipated to occur on an event day, and therefore cannot conclude that the masterplan design is adequate.
- The Crowd Flow Study does not adequately address the event day crowd management requirements and the impact that the design proposals will have on wider Zone Ex crowd safety and operational flexibility.
- The crowd and queuing analysis presented in the document cannot be sufficiently sense-checked based on the content of the document alone, so it is not possible to verify the outcomes and resultant conclusions.
- There has been inadequate consideration of egress patterns for all event types, particularly concerts and other events with a “hard finish”.
- There has been inadequate consideration of the interim construction phase (over 10 years), which would affect the running of some 500 major events.
- There has been inadequate consideration of the impact of unplanned disruptions on the rail network, or other emergencies or incidents.
- The study makes no reference or assessment of the needs of those with mobility impairments (we note that neither the Crowd Flow Study nor the OR has considered this issue in the context of the Public Sector Equality Duty).
- The input assumptions are based on the 2015 Transport Assessment before the Stadium was opened – using actual recorded data associated with the new Stadium would be a more sound basis of assessment.
- No justification has been provided for the choice of flow rates and queuing density parameters.

Movement Strategies conclude that the Crowd Flow Study does not provide sufficient confidence that safe and efficient crowd flow operations can be provided both during the 10 year construction period and also in the permanent “end state”.

No information is provided within the Crowd Flow Study on the interaction between the proposals and the Major Event Day Local Area Management Plan that was agreed following extensive discussions between THFC, the Council and other stakeholders.

By way of one example to illustrate the lack of understanding underpinning the Crowd Flow Study, we would comment on the proposed removal of the northbound queue and entrance point to White Hart Lane Station on White Hart Lane. It is proposed that spectators will circulate on the Stadium North Podium and walk to and through Moselle Square to the northbound queue. There is inadequate footway to accommodate southbound pedestrians in this location and the proposals are simply incompatible with the current Hostile Vehicle Management Line in crowd safety terms.

The interaction between the High Road West Application and the current crowd flow operations associated with the Tottenham Hotspur Stadium give rise to very real practical, legal and financial considerations that have not been considered by officers in the OR.

There have been no discussions with the Applicant over basic issues such as legal rights of access across third party land, responsibility for additional barriers and stewarding or construction hoarding standards and maintenance.

As highlighted by Movement Strategies, the ultimate risk to THFC in the event that the applicant's proposals do not work, is that the Tottenham Hotspur Stadium licence will be revoked or for example the capacity of the Stadium is reduced. In such circumstances, THFC would take advice on whether it would have an actionable claim against the Applicant

and the Council. Nowhere within the Crowd Flow Study or the OR is this risk acknowledged. In turn, no indication is provided in either document of any proposals to indemnify THFC in such circumstances or otherwise make any financial contribution towards any increased costs of crowd flow management as a result of the High Road West Application.

THFC also understands that its concerns regarding the failure to undertake proper consultation on the proposals are likewise shared by the Council's Head of Building Control in his capacity as chair of the Tottenham Hotspur Stadium Safety Advisory Group. THFC wrote to Mr McIver to set out its concerns and understands that he has recommended to officers that an emergency meeting of the SAG (involving all relevant stakeholder members) should take place to consider the Crowd Flow Study before the Council (in its capacity as local planning authority) determines the High Road West Application. This advice has been ignored.

This advice from the Council's own Head of Building Control is plainly a material consideration and needs to be made clear to members of the Planning Sub-Committee. It also illustrates the importance of the Council properly publicising and consulting upon the Crowd Flow Study in accordance with the requirements of the EIA Regulations.

In turn, the cursory treatment of crowd flow safety issues in the OR does not fully and fairly properly set out for members the actual advice given by the Council's own consultant Dr Dickie. It is clear that he shares many of the concerns raised by Movement Strategies.

In particular he makes three key conclusions that have not been accurately reported to members:

- a. The Crowd Flow Study has not been based on the correct data and in particular the Study has not been based on the provision of adequate queuing space values.
- b. The proposed strategy would not work in events involving a hard finish – such as concerts.
- c. The temporary arrangements during the construction period would not provide safe and effective management of pedestrian flows on event days – and that the proposal needs to be revisited using confirmed queuing numbers. (our emphasis)

None of these three conclusions have been made clear to members in the OR. In particular, the inadequacy of the temporary arrangements is extremely important given the predicted 10 year construction period. Over 10 years it is not unreasonable to assume that over 500 full capacity events could take place at the stadium, equating to 500 million spectator movements through this space. Dr Dickie's clear advice is that the current proposals would not provide safe or effective operations for all these events.

The OR also fails to address relevant planning policy requirements relating to pedestrian movements and crowd flows. Policy GG1 of the London Plan (Building strong and inclusive communities) requires streets and public spaces to be consistently planned for people to move around and spend time in comfort and safety... At this stage, it is not possible to determine whether crowd flows will allow this to take place. Similarly, no consideration has been given to Policy D11 (Safety, Security and resilience to emergency) of the London Plan, which requires safety aspects of design to be considered at the start of the design process, i.e. not deferred to a later date.

The approach adopted by the Council at paragraph 9.28 of the OR is unlawful as it seeks to leave to conditions a matter that is integral to the principle of development. First as set out above, paragraph 9.28 does not fully or accurately record the extent of the Council own crowd flow expert. Secondly 9.28 of the OR explicitly records further assessment is required:

“ The Study has been reviewed by the Council’s independent crowd flow expert who has found that further assessment needs to be undertaken to support the suggestion that both northbound platform and southbound platform queues can be accommodated within the proposed Moselle Square” (our emphasis)

The Council are required to determine these issues now. They cannot be left to a condition (the drafting of which has not yet been made publicly available) as it is unknown whether what the condition would be seeking to achieve is possible.

This is exactly the legal error that the Court of Appeal identified in R. (on the application of Hillingdon LBC) v Secretary of State for Transport [2021] P.T.S.R. 113. In that case the court were concerned with a condition that meant the original approval was valid only after investigations as to the archaeological impact of the works on the site were undertaken and if those investigations did not discover anything of archaeological significance. At [89] of the decision Lindblom LJ found that such a condition was legally flawed:

“89. In our judgment, applying the test set out above, such a condition would fall foul of the second and third basic requirements: (i) the condition is integral to the validity of the approval which is intended to confer a permit to conduct the development works, but at the time the condition is imposed the authority does not know whether the development works are to be " permitted " and therefore it cannot fairly and reasonably relate to it (second basic requirement); and (ii) it is irrational and unreasonable for an authority to be compelled to give what is intended to be a definitive approval to a request but also subject it to a condition that requires the authority to consider later whether the approval should have been granted in the first place (third basic requirement).”

Here, the suggestion in the OR is that a condition can be imposed which will seek further work to ascertain whether there are crowd flow issues, if that condition reveals that there are crowd flows issues then the permission would not be implementable. Such a condition would be unlawful for precisely the same reasons given in Hillingdon LBC.

The Council cannot proceed to grant planning permission until it is satisfied that it is in principle possible to address crowd flow issues and provide safe and effective crowd flow operations both during the 10 year construction phase and also in the end state. In light of the issues raised by Movement Strategies, the Council’s own expert Dr Dickie and the position of the Council’s Head of Building Control (and chair of the Stadium Safety Advisory Group), the Council is plainly not in a position to reach that conclusion.

2. Heritage impacts

The OR and the internal consultation response from the Conservation Officer illustrate very clearly why too much flexibility is proposed within the High Road West Application and highlight a number of inconsistencies in the way the application has been assessed.

Appendix 2 comprises a review of heritage aspects of the OR. Committee members should be aware that:

1. The OR does not accurately set out the several areas where the Conservation Officer does not agree with the Applicant’s assessment.
2. The OR completely omits any analysis or consideration of several heritage assets, including 9 locally listed buildings.

3. There are fundamental inconsistencies in the analysis between the OR and the Conservation Officer. Some heritage assets are assessed by the OR which the Conservation Officer did not assess at all. Some assessments differ.
4. Not once does the OR communicate the “*overwhelming impact*” on heritage assets identified by the Conservation Officer, or the several concerns regarding the maximum parameters.
5. It is not at all clear whether the OR assesses the maximum parameters or the illustrative scheme.

Because the officers drafting the OR have ignored several heritage assets and taken a different view to the Conservation Officer in places, it is impossible for the Committee to properly understand the degree of harm as required by statute and policy.

The Conservation Officer’s comments appear to conclude that there would be harm at the “mid range” of “less than substantial”. However, from the preceding paragraph it appears that this assessment is based on the illustrative scheme rather than maximum parameters (about which she had previously expressed strong concerns).

The NPPF (para. 203) requires a balanced judgement having regard to the scale and any harm to the significance of the heritage asset. “Great weight” must be given to any harm to designated assets however, a clear understanding of the degree of harm and public benefits (see below) are not at all clear from the OR.

Appendix 3 comprises an audit of the consultation response from the Conservation Officer. It highlights several fundamental errors in the judgements made and associated conclusions. This is perhaps not surprising, given the various inconsistencies between the application documents (including parameter plans and design codes) and the very significant variation between the illustrative scheme and proposed parameters. The following are of particular concern:

1. Reference to illustrative parameters which suggests confusion about what is being sought for approval and a reliance on the illustrative scheme rather than the maximum parameters.
2. An indication from the Conservation Officer that the inconsistencies between the parameters and design codes mean that it is very difficult to assess harm.
3. Significant inconsistencies in the approach taken compared to THFCs Goods Yard and Depot proposals.
4. Omissions of analysis on some key heritage assets including the Grade II* Dial House.
5. A conclusion of “*the mid-range of ‘less than substantial’*” in the illustrative “*most heritage-sympathetic configuration*”. No assessment has been provided of the worst-case maximum parameters and, based on the officer’s advice, it is impossible to tell what this would be.

We repeat the points made in our letter of 4 March which the OR has simply failed to address.

In light of the confusion in the OR and Conservation Officer's comments. We also now attach as **Appendix 4** a series of illustrations and showing views not included within the applicant's assessment and to demonstrate the potential difference in the scale of development between the illustrative scheme and the maximum parameters.

In respect of the public benefits put forward to weigh in the balance against the identified harm, we note that the summary set out at paragraph 13.51 of the OR is different to the summary reasons given in the opening section of the OR. In turn the OR does not accurately or fairly qualitatively or quantitatively assess these benefits for members.

For example, reference is made to "Delivery of a new library and learning centre" – but no reference is made to the fact that the applicant has only committed to a 500 sqm building (significantly smaller than contemplated in the adopted Masterplan). As set out in our earlier letter there is a significant difference in the weight that can be given to a 500 sqm building as opposed to a 3,500 sqm building.

In turn in respect of jobs paragraph 13.51 puts forward as a public benefit the "creation of 374 FTE jobs on-site, once complete". It is not explained to members that this actually represents a significant loss of existing jobs on site nor that the numbers are based on an inaccurate assessment of the worst case scenario as set out in our earlier letter.

The OR also includes generic unquantified "benefits" such as bio-diversity enhancements (a policy requirement), the development of local supply chains and the delivery of a high quality development. No guidance is given to members on the actual specific benefit that will be provided above and beyond normal necessary policy compliance.

The treatment of heritage matters in the OR gives rise to a number of additional legal errors to those already highlighted in our letter of 4 March. The inconsistency of approach between the assessment of the application and that taken to the THFC's Goods Yard and Depot principles offends the principle of consistency of decision making which constitutes a public law error; see for example Fox Strategic Land and Property Ltd. v Secretary of State for Communities and Local Government [2013] 1 P. & C.R. 6.

In turn the failure to accurately reflect the opinion of the Conservation Officer in the OR or provide reasons for departing from their opinion has the effect of significantly misleading the committee which legally flaws the OR; see for example R v Selby DC ex parte Oxtou Farms [1997] 4 WLUK 278.

3. Other matters

Only a cursory response has been provided by officers in respect of the matters raised in Appendix 3 of the OR to our letter of 4 March. No response has been provided on Design Matters (Section 6 of our 4 March letter) and officers have failed to properly grasp the legitimate serious concerns which were expressed. We respond to a number of specific matters not addressed below and this is by no means an exhaustive list.

Before doing so it is important to reiterate two key points of principle from our 4 March letter. First, we highlighted that the amount of flexibility sought by the applicant would make it extremely difficult for the Council to form a meaningful assessment on the impacts of the scheme. This concern has been proven to be well-founded by the OR. There is no consistency throughout the OR as to what level/nature/mix of development would be acceptable. The consequence of this is that the OR recommends approval of a scheme which is legally capable of delivering something entirely different to what has been (or may have been) deemed to be acceptable. This constitutes a legal error as the OR simultaneously has regard to immaterial considerations, fails to have regard to material

considerations and does not provide sufficient reasoning for why the Application is found to be acceptable.

Secondly, the OR has fallen into the legal error highlighted in *R. v Rochdale MBC Ex p. Milne (No.2)* [2001] Env. L.R. 22. The flexibility sought in the application is too great to allow the likely significant effects to be properly assessed, there are simply too many potential outcomes that need to be considered and have not been. The result is that the OR has failed to properly consider the likely significant effects of the Application.

Lack of certainty and commitment making it impossible to properly assess the impacts

In response to THFC's concerns about the lack of commitments to community facilities, officers have responded by saying the ES has considered a "worst case". However, the OR has not properly acknowledged that it cannot count anything more than the minimums proposed in weighing the overall planning and heritage balance. Page 2 of the OR refers to a huge range of between 7,225 sqm and 36,300 sqm of community and employment floorspace and cites the illustrative scheme delivering 17,600 sqm of community and employment floorspace. At the reserved matters stage, the Council will have no means of making the Applicant provide any more than the minimums and therefore that is what must be assessed and included in the planning balance. This has not been made clear to members of the Planning Sub-Committee.

Reference is made to health facilities provided alongside THFC stadium in Appendix 3 of the OR. However, this was provided as part of those proposals and in response to demand in the Northumberland Park area. No assessment has been undertaken in the Applicant's Environmental Statement in respect of whether that scheme is capable of meeting the health care needs for existing and future residents. Indeed, paragraph 14.7.29 of the applicants ES assumes that there is capacity rather than actually assessing it as follows:

'However, as outlined above the Cumulative Schemes will see the delivery of a new healthcare centre. It is therefore assumed that the increase in demand generated by the Proposed Development and Cumulative schemes can be accommodated within this new practice. On this basis, the overall magnitude of impact on the receptor is therefore assessed as negligible.' [Emphasis Added]

Composition of the Application scheme

As highlighted in our 4 March letter, the absence of any B2 and B8 floorspace in the scheme shows how little the applicant is committed to providing replacement accommodation for existing businesses on site. In the absence of B2 and B8 floorspace being listed in the description of development itself, planning permission would not be granted for these uses. We note that the Applicant has sought to amend the parameter plans to refer to these uses. However, without a revised description of development (which requires full re-consultation of the whole application), it is not possible for the Council to grant permission for these employment uses. Again, this needs to be made clear to members of the Planning Sub-Committee.

The OR at paragraphs 7.35 and 7.36 has regard to the provision of B2 and B8 floorspace as part of its reasoning for finding that the Application complies with the NT5 allocation and HRWMF. This is a clear legal error. If the policy compliance of the High Road West Application is dependent on the delivery of B2 and B8 floorspace then that floorspace must be deliverable. However, it is not as it is not included in the description of development and so could not be developed under any planning permission granted on the Application.

The importance of the description of development and the distinction between it and the conditions attached to it was succinctly stated by Hickinbottom J (as he then was) in Cotswold Grange County Park LLP v Secretary of State for Communities and Local Government [2014] EWHC 1138 (Admin), [2014] JPL 981 at [15]:

"... the grant identifies what can be done—what is permitted—so far as use of land is concerned; whereas conditions identify what cannot be done—what is forbidden."

The High Road West Application currently before the Council cannot grant permission for B2 or B8 use. Further, by relying on the provision of such uses in determining the High Road West Application the Council will have fallen into legal error by having regard to an immaterial consideration.

Compliance with the TAAP & HRWMF

We note that the conclusions of the OR (paragraph 30.1) acknowledge at least seven areas where there is non-compliance with the HRWMF but there is no preceding analysis to explain the degree of non-compliance and the justification for such departures.

Critically, there is no proper consideration of compliance with allocation NT5 of the Tottenham Area Action Plan in the OR, which forms part of the statutory development plan. Paragraph 3.27 onwards of our 4 March letter noted several areas of non-compliance including how the proposals do not include a new leisure destination for London, nor increase the quality and quantity of community facilities proportionate to population growth. The Council's response to THFC's consultation response also ignores these important omissions.

Assessment of the effects of the application

Similarly, officers have failed to respond to concerns in respect of the reliance on the illustrative scheme to assess housing density and open space requirements.

Indeed, the Committee Report appears to have factual errors in respect of housing density. Paragraph 7.42 and 30.6 of the OR reports a stated density figure of 341.7 U/Ha. However, this appears to be based on the gross site area (i.e. 2,929 units / 8.57 ha), and not the net site area, apparently ignoring the ratio of residential to any non-residential floorspace. This appears inconsistent with how the density of the illustrative scheme is described in the applicants Design and Access Statement; a figure of 337 U/Ha that is reported in paragraph 7.42 of the committee report. THFC calculate that the overall site density could be a much higher as set out in paragraph 4.4 of our 4 March letter.

4. Conclusion

The OR has failed to address the fundamental concerns raised in THFCs objection letters. Indeed, the reasoning in the OR exemplifies the concerns which THFC and others have expressed in relation to crowd flow safety, the unacceptable degree of flexibility sought (and related heritage and other concerns) and other material issues.

Again, we would urge you to confirm by return that the determination of the High Road West Application will be removed from the Planning Sub-Committee agenda for the meeting on 17 March and that the Crowd Flow Study will be formally publicised and consulted upon in accordance with the mandatory requirements of the EIA Regulations.

Yours sincerely

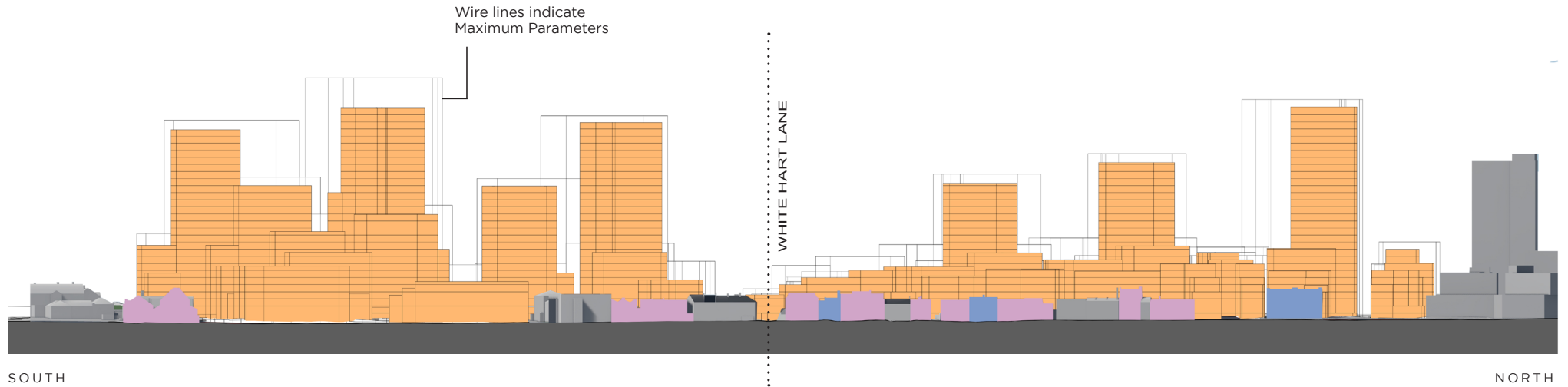
A handwritten signature in black ink, appearing to read "Richard Max & Co". The signature is written in a cursive, slightly slanted style.

RICHARD MAX & CO

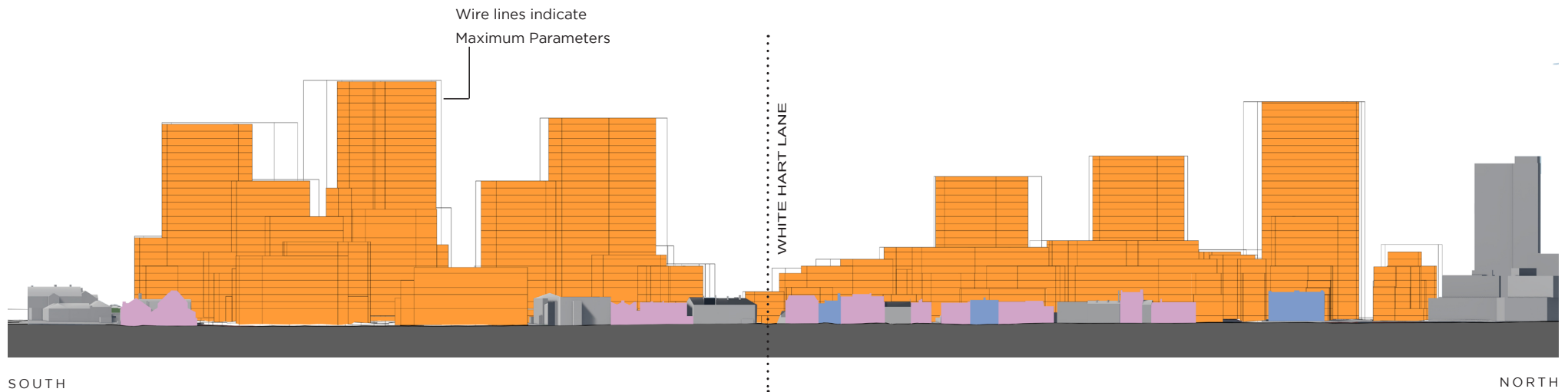
HIGH ROAD - EAST ELEVATION COMPARISON

- Locally Listed Buildings
- Listed Buildings
- Illustrative Scheme
- Alternative Maximum Scenario

ILLUSTRATIVE SCHEME



ALTERNATIVE MAXIMUM SCENARIO - POSSIBLE IF PERMISSION GRANTED

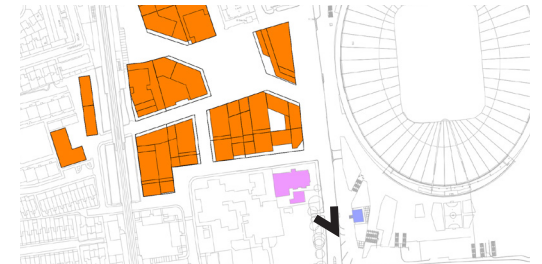


VIEW LOOKING NORTH ALONG HIGH ROAD

ILLUSTRATIVE SCHEME



- Locally Listed Buildings
- Listed Buildings



ALTERNATIVE MAXIMUM SCENARIO - POSSIBLE IF PERMISSION GRANTED

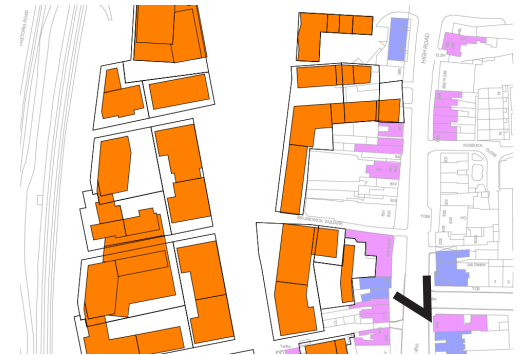


VIEW LOOKING NORTH ALONG HIGH ROAD

ILLUSTRATIVE SCHEME



- Locally Listed Buildings
- Listed Buildings



ALTERNATIVE MAXIMUM SCENARIO - POSSIBLE IF PERMISSION GRANTED



VIEW LOOKING WEST TOWARDS WHITE HART LANE

ILLUSTRATIVE SCHEME



- Locally Listed Buildings
- Listed Buildings

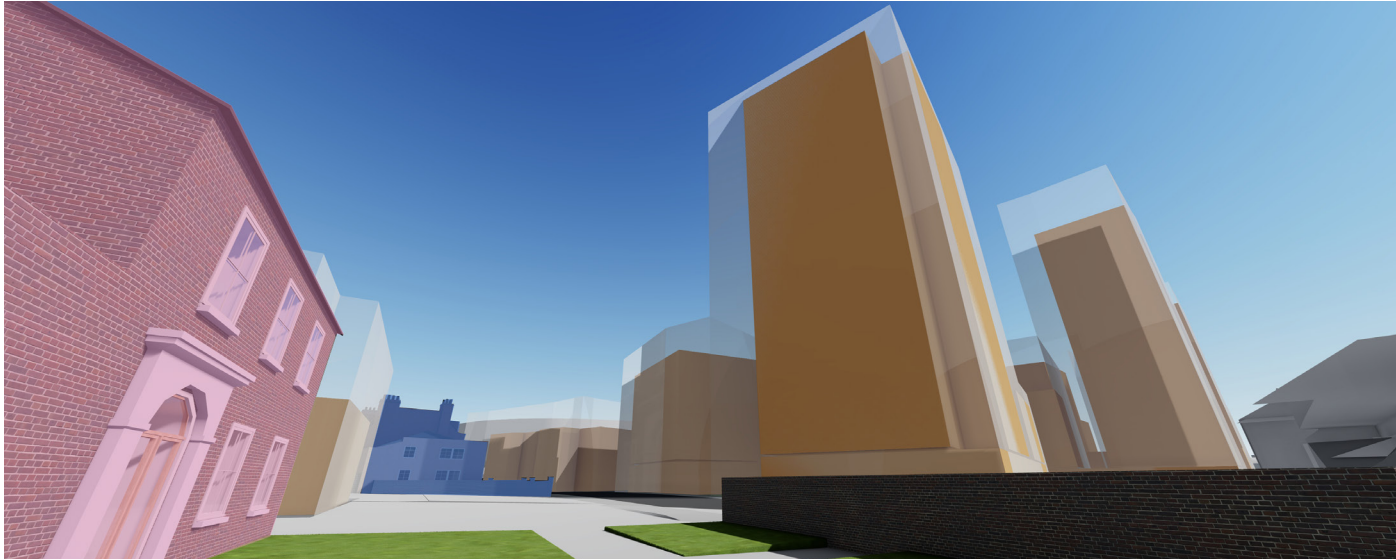


ALTERNATIVE MAXIMUM SCENARIO - POSSIBLE IF PERMISSION GRANTED



VIEW LOOKING TOWARDS THE GRANGE, ALONG WHITE HART LANE

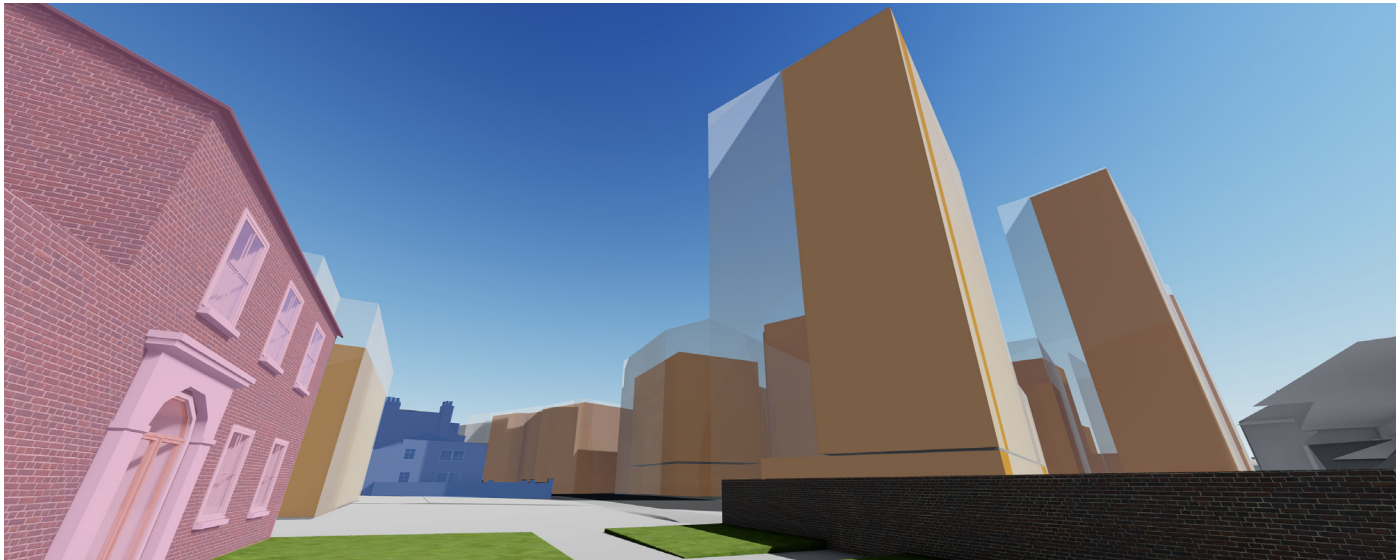
ILLUSTRATIVE SCHEME



- Locally Listed Buildings
- Listed Buildings



ALTERNATIVE MAXIMUM SCENARIO - POSSIBLE IF PERMISSION GRANTED



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TO DARE IS TO DO



16 March 2022

Dear Cllr Williams,

On Thursday 17 March you will be asked to determine a planning application for High Road West that will have a profound impact upon the future of North Tottenham.

I am taking the unusual step of writing to you in advance of that meeting, on behalf of Tottenham Hotspur Football Club, the largest private sector employer and socio-economic driver in the Borough.

We are extremely concerned that this application not only lets down our communities and residents, but that it utterly fails to live up to even the most basic of aspirations that the Council set for positive change in the area.

The terrible August 2011 riots, the second riots to rock this area, were a wake-up call for everyone.

The aspirations and objectives set out by the Council in response to the riots were not just about housing – but about real transformative change. This was to be achieved through the delivery of jobs, social and community infrastructure and the creation of a premier leisure destination for London. That aspiration was long consulted upon and subsequently endorsed in both the High Road West Masterplan (2014) and the Adopted Tottenham Area Action Plan (2017).

It was on this basis that we confirmed our decision, in a written agreement with the Council, to remain in Tottenham and to commit £1.2bn of investment in the Tottenham Hotspur Stadium and the wider Northumberland Development Project. We did not just want to build a stadium, we wanted to change the prospects for those that live in this part of London, particularly after the riots and for our stadium to be the flagship development that kickstarted its regeneration.

The word regeneration is often used. It's important to understand what we mean when we use it. We see it as bringing hope, prosperity and uplift to the people of Tottenham, embracing the local community, building on the character and talents of the area.

We have been good to our word. Not only have we created one of the finest multi-use stadiums in the world – a multi-award winning new landmark for Tottenham which performed important civic functions during the pandemic, and which has hosted so many public sector and Council events for you – we delivered a new Sainsbury's, a gym, retail outlets, 400 new homes of which 71% are affordable, Brook House primary school and the thriving London Academy of Excellence Tottenham to transform educational opportunities in the area. We've delivered nearly 4,000 permanent local jobs, and recently held a Jobs Fair at the stadium which saw more than 2,000 people queueing around the block to access job opportunities from over 50 employers.

The importance of employment should never be underestimated – it is fundamental to regeneration. It gives people purpose and self-esteem along with disposable income to create further economic activity. Sir Stewart Lipton's report *'It took another riot'* in December 2012 said this:

"Unemployment is the single biggest local issue with Tottenham suffering some of the highest levels in London. Tottenham needs more jobs, and it needs more of its jobs to go to local people."

The Council's own 2014 Masterplan Framework reference in the Overview and Scrutiny Committee report (29 November 2021) confirmed that the Council's vision included:

“A balanced place to live and work.... There will be high quality new workspaces and new job opportunities for the local community.”

Unforgivably, there has been no focus on jobs at all in these proposals. No space is secured for industrial use and just 1.6% of the total possible development is secured for employment (use class E). On the basis of what is actually secured by the Council, your own Officer Report confirms that just 374 jobs would be provided on site, a loss of 316 jobs compared with employment on site right now.

What is coming before the planning committee has no socio-economic or community benefits to speak of. It is plainly and simply a dense housing estate of up to 3,000 homes.

There is no mixed-use – the proposals are for up to 97% residential uses. The total space secured for indoor sports and recreation use is just 500 square metres across the whole area. The new ‘Moselle Square Library and Learning Centre’, despite this being much heralded through consultation, is also secured at just 500 square metres, smaller than the current library.

There is no new creche and nursery provision at all, no medical or healthcare facilities, and a minimum of just 500 square metres of community hall space.

No other developer would be allowed to even progress a planning application on this basis, let alone have it taken to committee with a recommendation to grant permission. Is this what Councillors really want to deliver for North Tottenham, after ten years of consultation and engagement?

The application itself also contains fundamental flaws and is so vague in nature that it is simply impossible to know what would be delivered, let alone properly assess the impact on listed buildings, conservation areas or crowd movement.

There has been an inexplicable failure to properly assess the safe movement of people. Nearly one million people pass through the space to and from the Stadium and White Hart Lane Station each year. Crowd Flow assessments formed no part of the original application, with the detailed assessments only shared with the Club a few days ago, on 4 March 2022. Even with such limited time to assess it, our expert advisors have identified serious flaws which lead us to the conclusion that the measures proposed would be unsafe and have major adverse consequences on anyone living in the area.

This isn't just an operational issue, it is a matter of public safety, and one we spent years developing with the police, transport operators and other partners. It cannot be left to conditions, or as a matter of trust in Lendlease, and the Council cannot simply ignore the fact that the application site lies directly between a 62,000 seat Stadium and the nearest public transport hub.

If significant changes to the scheme are needed – which the Council's own crowd flow expert has confirmed to be the case – that needs to happen before a planning permission is granted, not after. You cannot fix development parameters now, without knowing if it is safe, or what the impacts will be on the local community as crowd flows navigate themselves through what will be a construction site for ten years.

We are also astonished by the unprecedented level of uncertainty allowed through this application; an approach unique for such a sensitive urban location. You cannot know how tall or dense buildings will be, or even their orientation, and you cannot therefore understand their impact next to listed buildings and conservation areas. I enclose some images comparing what has been presented to the committee as an ‘illustrative scheme’ with the maximum alternative possible development. The

Council's Conservation Officer has already identified harm – based on the illustrative scheme rather than the true worst-case scenario – and the approach taken for this application is in direct contrast to any other applications that you will have had before, where complete heritage assessments and detailed design considerations were fully thought through before any planning permission was granted.

It would be a grave mistake for the planning committee to think that it can secure greater community benefits later, through future reserved matter applications or conditions. The approval of the outline application will fix the scale of development within each building envelope and the uses within the maximum and minimum parameters. Once the outline application has been approved there can be no going back. At the reserved matters stage for each slice of development, you will have no power to insist upon more than the minimum floorspaces permitted (in many cases zero), or a different balance of uses to provide greater employment, community or leisure facilities.

The Club has no choice other than to object in the strongest possible terms and the sheer volume of other objections that this application has generated is testament to the strength of local feeling.

If, like the Club and the local community, you are unhappy with the scheme or have concerns, now is the time to make that clear. This application is self-evidently rushed and not ready for consideration by the planning committee, and we are calling for it to be refused or at the very least deferred to allow proper consideration of the matters raised. We are willing, as we always have been, to work together with the Council and Lendlease as part of this process. Indeed, we have been waiting for the establishment of a Strategic Forum to enable this to happen.

This is not about finances or creating a new walkway to our stadium door. We already have our stadium and our fans have found their way to our front door quite happily. Unlike any developer, we are not here to develop, take a profit and leave – we are here for the long term. This is our home.

We fundamentally care about our neighbourhood. That's why we have delivered new, affordable homes, schools, shops and jobs alongside our stadium and embedded our Foundation.

Our vision is that our neighbourhood is a prosperous mixed community. That if you live here, you should be able to study, work and play here.

The proposals before you on Thursday do little to uplift the lives of people living in the area. It fails those it should be helping, and I urge you to reject or at the very least defer this application.

Yours sincerely,



Daniel Levy
Chairman

CC:

- Cllr Peray Ahmet, Leader, Haringey Council
- David Lammy MP
- Cllr John Bevan, Cabinet Member for Planning, Licensing and Housing Services, Haringey Council
- Cllr Sheila Peacock, Vice-Chair, Planning Sub Committee, Haringey Council
- Cllr Gina Adamou, Member, Planning Sub Committee, Haringey Council
- Cllr Dhiren Basu, Member, Planning Sub Committee, Haringey Council
- Cllr Luke Cawley-Harrison, Member, Planning Sub Committee, Haringey Council

- Cllr Emine Ibrahim, Member, Planning Sub Committee, Haringey Council
- Cllr Peter Mitchell, Member, Planning Sub Committee, Haringey Council
- Cllr Liz Morris, Member, Planning Sub Committee, Haringey Council
- Cllr Reg Rice, Member, Planning Sub Committee, Haringey Council
- Cllr Viv Ross, Member, Planning Sub Committee, Haringey Council
- Cllr Yvonne Say, Member, Planning Sub Committee, Haringey Council
- Jules Pipe, Deputy Mayor for Planning, Regeneration and Skills, GLA
- Andy Donald, Interim Chief Executive, Haringey Council
- David Joyce, Director of Housing, Regeneration and Planning, Haringey Council
- Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability, Haringey Council
- Robbie McNaugher, Head of Development Management and Planning Enforcement, Haringey Council
- Philip Elliott, Principal Planning Officer, Haringey Council
- Georgina Sapsted, Cannon Road Residents' Association
- Kate Worley and Barbara Cordwell, Headcorn, Tenterden, Beaufoy and Gretton Roads (HTBG) Residents' Association
- Gethin Segal, Homes for Haringey
- Bilad Dhoof, Love Lane Residents' Association
- Nick Olivieri, Peacock Industrial Estate
- Tino Leone, TAG Love Lane
- Moaz Nanjuwany, Tottenham Traders' Partnership

Enclosure:

- Images comparing the 'illustrative scheme' with the maximum alternative possible development.



By email
16 March 2022

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arup.com

Your ref HGY/2021/3175
Our ref 278880-00/4.10
File ref Arup Letter Haringey Planning

Dear Philip,

High Road West Planning Sub-Committee Report

As instructed by our client, Tottenham Hotspur Football Club, please see attached comments on the Planning Sub Committee report ahead of the Committee meeting tomorrow. Arup are a leading multi-disciplinary design and planning consultancy and we have had a long involvement in the High Road West, as author of the adopted High Road West Masterplan Framework (HRWMF) and ongoing involvement in the Goods Yard applications. We are committed to the vision and ambition embodied in the masterplan to deliver “a vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham”.

As noted in the conclusion, in my view, the ambition and commitment to communities and place is lost in the current proposal. The application as it stands will not deliver the masterplan, the Tottenham Area Action Plan or the Council’s aspirations for High Road West. It misses the opportunity to deliver truly mixed-use development and deliver good growth for North Tottenham.

Yours sincerely



Sophie Camburn
Director, Arup
e sophie.camburn@arup.com

Enc [Click or tap here to enter text.](#)
cc Robbie McNaugher, Haringey Council
Richard Serra, THFC
Shaun Bashforth QUOD

Our ref 278880-00/4.10
Date 16 March 2022

Response to Haringey Planning Sub-Committee Report for 17th March 2022 reference HGY/2021/3175 - HIGH ROAD WEST, N17

1. Reference Section 30 The Conclusion and Planning Balance (page 154)

- 1.1 Item 30.1 notes that the proposed development does not conform with the 2014 High Road West Masterplan Framework (HRWMF).
- 1.2 As author of the 2014 Masterplan, developed over two years with high levels of engagement and consultation and subsequently adopted in 2017 as part of the NT5 Site Allocation in the Tottenham Area Action Plan (TAAP), this departure from policy causes significant concern.
- 1.3 This is addressed in points 2-4 as follows:

2. The Vision for High Road West

- 2.1 The ambition of the 2014 Masterplan links to the wider Tottenham Regeneration Strategy and seeks to create a range of destinations along the High Road with different characteristics, predominantly determined through land use. The HRW MF states that the vision for High Road West is “a vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham”.
- 2.2 The committee report acknowledges that the proposed scheme departs from the HRWMF as the proposed uses do not explicitly provide leisure space opposite the stadium to create a sports and leisure destination for north London or include formal sports provision in the park.
- 2.3 This departure from policy causes significant concern. Section 2.38 of the AAP states that “...the redevelopment of High Road West offers the opportunity to create a new local centre.....” and 3.23 states that “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.”
- 2.4 The minimum and maximum leisure and community land uses (Class E and F and Sui Generis) in the proposed scheme are 7,225 sqm and 36,300sqm respectively, which as a portion of total development area, equates to 2.8 % or 10% of total GFA. This minimum component represents a significant reduction from the land use mix proposed in the HRWMF which is 19,150 sqm, or 13.9% of GFA. It is unlikely that the proposed reduction will therefore deliver the vibrancy described by policy to create a premier leisure destination in North London.

Our ref 278880-00/4.10
Date 16 March 2022

2.5 Furthermore, the HRWMF proposed around 1200 homes compared to the potential 2,869 homes, in the proposed scheme. The liveability of High Road West is likely to be significantly reduced by the increase in residential density alongside a decrease in community and leisure infrastructure. Rather, the increase in residential development should be matched by an increase in supporting land uses, commensurate with proposed density and scale, to create a great place and a liveable neighbourhood.

3. Heights, Massing and Heritage Impacts

3.1 Section 3.12 of the HRWMF states that building heights will respond to the context of heritage assets. It notes that a key design principle is that “Tall buildings will only be considered in parts of the masterplan area where the existing character would not be affected adversely by the scale mass or bulk of a tall building”. It further states that “Taller buildings [are] placed along the railway line away from the High Road. This creates an edge to the development and builds on the character established by the tower at Brook House”

3.2 The placement of tall buildings in the proposed scheme departs significantly from these two approved design principles. This departure from policy loses the visual clarity of the scheme massing.

3.3 In addition, the proposed 29-34 storey tower on White Hart Lane is near to a number of heritage assets and is likely to cause significant negative impact to the Conservation Area and the setting of several listed buildings within it including the Station Masters Cottage (locally listed) and the Grange (Grade II listed). It is a significant departure from policy with detrimental impact to heritage assets and existing character of the area.

3.4 The HRWMF proposed retail and commercial uses to reactivate the railway arches. This is not included in the proposed scheme and is a disappointing departure from agreed policy, missing an opportunity to create unique character and identity and bring heritage assets back into reuse.

3.5 The approach to heritage in the proposed scheme departs from policy and the scheme should be assessed against the approved design principles with regard to impact on White Hart Lane Conservation area and listed buildings, in particular with regard to heights, massing and overshadowing.

4. Phasing

4.1 The Sub-Committee report notes the indicative phasing in Figure 2/ Table 02 (pages 18 and 19 respectively). The overall logic taken appears sound however it is disappointing to note that Moselle Square is include in Phase 3, which runs from 2024-2032.

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4.2 Without further detail and assurance there is a real possibility that a significant proportion of development will be brought forward ahead of any major public realm delivery and that the Moselle Square may not be complete until after 8 years of development is undertaken. This approach misses a significant opportunity to create a sense of place – to link White Hart Lane Station with the High Road and provide wider public amenity. In many major regeneration scheme it is the public realm that is brought forward first ahead of built form in order to create the destination and sense of place.

4.3 It is therefore suggested that the phasing is adjusted to bring forward delivery of Moselle Square into the earlier stages of Phase 2.

5. In conclusion

5.1 The ambition and commitment to communities and place that is embodied in the HRWMF and TAAP is lost in the current proposal. In my view, the application as it stands will not deliver the Council's aspirations for High Road West. It misses the opportunity to deliver good placemaking through truly mixed-use development appropriate to the proposed scale of homes and is unlikely to deliver good growth for North Tottenham. It is not aligned with the vision for a "vibrant, attractive, and sustainable neighbourhood and a new sport and leisure destination for North Tottenham".

Argles James

From: Planning Support
Subject: FW: HGY/2021/3175 - High Road West N17 - Final Transport Planning Comments + Updated Contributions

Sent: 10 March 2022 11:13

Subject: HGY/2021/3175 - High Road West N17 - Final Transport Planning Comments + Updated Contributions

Hi Maurice, Philip,

Below are my final transport planning comments on High Road West, some points are still outstanding as we are awaiting Steer's final response on the revised trip generation and the EIA methodology, and on the outcome of the review of Buro Happold's report on crowd flow and event operations.

Transport Assessment (including Car Parking Management Plan) and Design and Access Statement

Development Proposals

The floorspace and accommodation schedule of the outline element of the proposed development reflects suitable flexibility for a range of land uses, ranging between minimum and maximum parameters.

The latter are as follows:

- 280,000sqm C3
- 8,000sqm B2/B8
- 22,000sqm E
- 6,000sqm F
- 8,300sqm Sui Generis
- 5,000sqm as on-plot residential parking

Maximum total: 339,300sqm.

A maximum total of 2,977 residential units are proposed (297 existing properties, hence a proposed uplift of 2,680 units including +747 affordable units). The detailed element of the proposed development, Plot A, comprises 60 dwellings, of which 29 units are proposed to be family dwellings (3+bed units).

Public Transport Accessibility Level (PTAL)

It is noted that 64% of the site falls within PTAL 4, 25% PTAL 5 and 11% PTAL 3.

Active Travel Zone Assessment

The ATZ assessment has been reviewed in detail. The lists of personal injury accidents for each route do not identify accidents attributable to reasons other than human error. However, a number of suggestions have been made, including:

- Review and removal of footway parking where relevant to facilitate pedestrian flows along footways;
- Inclusion of cycle lanes to encourage cycling as a safe mode of transport;
- Improvements to pedestrian crossings with tactile paving, or creation of formal zebra crossings; and
- Improvements to footway and crossing surfacing.

The recommendations have been utilised to identify where highway, walking and cycling infrastructure could be made by means of contributions (see further below).

Cycle Access and Parking (Plot A)

There is now an additional cycle store in Block A1 and two cycle stores located to the rear of Blocks A2 and A3 have been reinstated. Overall and on balance, the design of the cycle parking stores complies with

the London Cycling Design Standards. Details of access, parking and dimensional and spacing requirements would be secured by planning condition.

Cycle Access and Parking (Masterplan)

The masterplan proposes a dedicated cycle route running through the masterplan site in a north-south direction, which avoids the High Road. A connection with the extension to Cycleway 1 is allowed for to the west of the site. Within the site it is understood that the intention is for cycling to be accommodated on carriageway along one-way and two-way vehicle routes as well as through public realm areas. Delineation would be provided along one-way routes and across the public realm, but not along two-way routes. No segregation is proposed.

Haringey Cycling Campaign has submitted an objection to the cycle route proposals and proposes an alternative route via the High Road. The applicant has not fully addressed Haringey Cycling Campaign's concerns around the cycle routes across the masterplan site, notably in terms of alignment and directness.

We have however requested that any contraflow cycle lanes along one-way streets on site be dedicated and segregated (and not just advisory, thus over and above the requirements set in LTN1/20), and likewise that segregation be achieved through public realm areas with forecast high footfall.

The proposed cycle routes would be reviewed in detail at Reserved Matters Application (RMA) stage and the mechanism for this secured via the Future Connectivity and Access Plan in the Section 106 agreement associated with the planning permission, should it be granted.

Car Parking (Plot A)

No general car parking is proposed on Plot A due to spatial constraints. Based on the telephone surveys of existing residents, it is estimated that the 60 units would generate parking demand for 26 vehicles. The proposal is to accommodate that demand on street in the local area in the interim, where sufficient spare capacity has been identified by the parking stress survey.

The Transport Assessment states that the minimum 3% accessible parking provision (resulting in 2 accessible spaces) would be accommodated on street on Whitehall Street from the outset. The ad-hoc provision of additional wheelchair-accessible spaces on street (up to 7%) is accepted. This matter would be managed through the Car Parking Management Plan, to be conditioned. An all on-street parking solution would be a short-term solution until more plots got delivered and some parking for Council housing residents relocated off street/off the CPZ. Any parking occurring on street would require CPZ permits to be arranged by Homes for Haringey on behalf of Plot A residents. This mechanism is to be managed through the Car Parking Management Plan to be secured by planning condition.

Car Parking (Masterplan) and Car Parking Management Plan

a. General

The proposals are for a combination of on-street spaces on public (CPZ) roads, private roads and off-street car parks (on plot). Existing accessible and doctors' bays as well as taxi ranks would be retained, which is welcome. It is indicated that the minimum 3% wheelchair-accessible provision would be delivered from the outset for each plot in the future, and the plan in Appendix F shows the indicative (safeguarded) footprints of delivering the full 10% wheelchair-accessible parking provision. Wheelchair-accessible parking for non-residential uses would also be provided, in line with the London Plan standards.

b. Council Housing

The telephone survey undertaken in May 2021 established a baseline to determine the likely maximum demand generated by future residents housed by Homes for Haringey. As all 500 Council housing units would be provided south of White Hart Lane, it is important that all plots delivered within that area as part of any future Reserved Matters applications make adequate allowance for parking. Based on the existing

parking demand generated by current Council housing residents, if all Council housing residents were offered the right to park, up to $500 \times 43\% = 215$ spaces would be required to meet the likely demand, which would have to be met mostly south of White Hart Lane, in close proximity of the proposed Council homes.

c. Family Dwellings (3+ bed units)

Likewise, it is noted that the whole masterplan would include approximately 16% of family dwellings (based on the illustrative masterplan). Any surplus non-CPZ parking not taken up by wheelchair users living on site should be offered to residents of family dwellings (in the order of priority, Council housing tenants would come in first, then residents of non-Council family-sized units). The priority order and mechanism for reallocation of accessible spaces on temporary leases should be discussed in more detail in the Car Parking Management Plan to be secured by planning condition.

d. Conclusion

Notwithstanding TfL's position on the likely accessible parking demand (1% or 3%), it is essential that, at this stage, a maximum number of car parking spaces across the whole masterplan be agreed, and this is to be capped at the maximum 10% provision as per the London Plan (2021) standard for residential disabled users' parking (a total of 297 spaces). It must be stressed again that the flexibility to have sufficient parking on site must be secured through the safeguarding of the additional 7% accessible parking provision both on plot and on street (public and private highway land). This is all the more important on the southern plots where Council housing is proposed to be located and where that additional demand for non-accessible parking would have to be met.

If future Council housing residents follow the same vehicle ownership patterns as existing ones on the Love Lane estate, and all are granted a right to park, then up to 215 spaces would be required to meet that demand (of which a small proportion would overlap with the accessible provision).

That would therefore bring the total parking provision somewhere in the region of 512 spaces (215+297) (or slightly fewer due to a number of wheelchair users being Council housing and family-dwelling residents). That would equate to an overall car parking ratio of 0.17 spaces per unit across the whole masterplan site. This is broadly in line with what was agreed for the Goods Yard and the Depot application (HGY/2021/1771) which provided an overall car parking ratio of 0.16 spaces per unit with parking provided at basement level.

The principle of carrying out car ownership and parking usage surveys in the future as part of each relevant RMA has been discussed previously, and is supported, however we would not allow subsequent plots and parts of the masterplan to come forward without the maximum 10% provision if no sufficient evidence is provided of a long-term reduction in car ownership amongst Council housing residents and generally occupants of family dwellings. The rationalisation of spaces following the conversion of accessible spaces into conventional spaces is a mechanism to be incorporated into the Car Parking Management Plan.

Overall, WebCAT indicates that the site mostly lies in areas of PTAL 4, with pockets of PTAL 5 and with the northwestern corner having a slightly lower PTAL (3). The site is also located in the Tottenham North CPZ. In accordance with Policy DM32: Parking of the Development Management DPD, the proposed development would qualify for a car-free status (the part of the site with lower connectivity is immediately adjacent to areas of PTAL 4; London Plan paragraph 10.6.4 also states that *"the starting point for discussions should be the highest existing or planned PTAL at the site"*).

The Council would not issue any occupiers with on-street resident/business parking permits due to its car-free nature, with the exception of Council housing residents relying at least in part on CPZ parking. The Council would use legal agreements to require the landowners to advise all occupiers of the car-free status of the proposed development.

Car club

A car club viability report has been provided which highlights that Zipcar recommends a total of 10 car club spaces. Car club membership contributions for all residents would be secured via a Section 106 planning obligation.

Residential Person Trip Generation – Car Drivers and Passengers

The adjusted residential car driver mode share associated with work trips has been adjusted from 22% to 3%. Whilst the adjustment is welcome, the justification provided in Table 5.13 is not entirely correct as parking would also comprise Council housing spaces for Council housing residents, for whom a non-negligible amount of car parking is proposed. A substantial part of Council residents have jobs requiring them to drive to and from work, this should be reflected in the mode share by weighting the expected proportion of Council housing residents in relation to the total resident population at the proposed development. Therefore, the residential car driver mode share should be revised upwards based on sensible assumptions related to the actual on-site parking provision and likely use, and other mode share redistributions should be made accordingly. There is scope to encourage a reduction of the car driver mode share over time with the Travel Plans.

The adjusted residential car driver and passenger mode shares associated with education trips are based on the postulate that education-related car trips would mirror work car trips, however this is likely not the case. As such, the car driver and passenger mode shares should be revised upwards to take account of parents escorting their children to/from school by car and children being driven to/from school as passengers. The modal split from NTS9908 for 2018/2019 (pre-pandemic) shows that the proportion of car or van trips was approximately 20%. The Travel in London Report 14 compares children's travel to/from school before the pandemic and now at schools located in and outside school streets (Figure 5.18), across 36 London schools including a few in Haringey. The results indicate that the proportion of car trips in the make-up of children's mode of travel to and from school ranged from 15% to 22%. That range should be seen as a guide to the likely baseline car driver and passenger mode shares for education trips (combining both education-only and escort trips), as families are more likely to need access to a car and a parking space if living in family-sized dwellings. Other mode share redistributions should be made accordingly.

The adjusted residential car driver and passenger mode shares associated with shopping and leisure trips also underestimate the proportion of trips made by car for big shops (either using a private car or a car club available on site) and day trips outside London. It is stated that capping the mode shares at 3% also matches the expected accessible car parking provision of 3% delivered from the outset, however there would be more spaces on site, including for Council housing residents and a proportion reallocated to residents of family dwellings across all tenures.

More work is still needed from the applicant's transport consultant on the modal splits in relation to car drivers and passengers, to achieve more realistic mode shares. Updating the car driver and passenger mode shares as set out above also means the proposed and net trip generations remain to be revised too.

The proposed delivery and servicing trip generation has been reviewed, more data from TRICS has been supplied by the transport consultant to justify in-house trip rates used for the assessment. The trip generation estimates and peak-hour demand are accepted, alongside the proposed loading bay provision designed to cater for maximum daily demand.

Impact on Bus Services

The initial bus impact assessment methodology was queried and a revised bus impact assessment has been submitted to address this and TfL's further comments. Whilst the number of bus routes has been reduced to take account of TfL's feedback, thus giving a more realistic assessment of the impact on local bus services, there is still no bespoke impact assessment per individual bus service (number of additional passengers per route vs theoretical capacity of typical bus used on a given route). Overall, however, it appears that the impact on each route would be low, but it is for TfL to state whether the revised assessment satisfactorily closes out the matter.

It is accepted that the bus cumulative impact assessment is undertaken internally by TfL.

Crowd Flow & Event Operations

Tottenham Hotspur Football Club (THFC) has raised an objection to the proposed development, namely in relation to crowd flows, safety and management. In particular, spectator flows quoted in the Transport Assessment now appear to be out of date. More recent data should be used to update the assessment.

The applicant has liaised with THFC to further engage and resolve the issues raised by the Club, including in finding an agreeable methodology for the impact assessment. It is understood that the Buro Happold report on crowd flow is being peer-reviewed on behalf of the Council. Discussions are ongoing between the applicant and THFC.

Outline Residential Travel Plan

The baseline surveys would be undertaken within 6 months of first occupation of the first phase or 75% residential occupation, with further surveys undertaken as each subsequent phase is complete and occupied. It should be made clear throughout the document that the trigger for the baseline travel surveys would be within 6 months of first occupation or once 75% occupation has been reached, whichever occurs first.

The forecast residential modal splits in Table 3.1 must be revised in line with the comments made on the Transport Assessment, notably in terms of car driver and passenger mode shares.

Likewise, the targets set in Table 4.1 will have to be revised for the same reasons. Although a reduction in the car driver and passenger mode shares is desirable over time, and in particular over the monitoring period, the decrease may only be in the region of a few percentage points.

References to car parking must reflect that all Council housing residents will be able to access a car parking space if they need one (not just decanted residents). Family parking should also be mentioned in the measures and action plan accordingly.

The Residential Travel Plan would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, interim and operational documents would be sought for Plot A but the mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.

Outline Framework (Commercial) Travel Plan

Individual tenants would have to produce their own individual Travel Plans or Travel Plan Statements by using the Framework Travel Plan as a basis, if they are above the minimum threshold for producing a document as per the TfL guidance. They would also be required to have their own Travel Plan Co-ordinators answering to the site-wide, overarching Travel Plan Co-ordinator.

The baseline travel survey would be undertaken within six months of first occupation of each phase of development, at the same time as the baseline delivery and servicing surveys.

The forecast commercial modal split in Table 3.1, derived from the Transport Assessment (Table 5.25), shows an assumed 50-50 split between London Overground and bus services. Owing to the high volume of commercial trips forecast to be made by public transport during the peak hours (in excess of 500 two-way movements), a significant number of trips could potentially be directed to the wrong public transport mode and the impact assessment undertaken in the Transport Assessment skewed as a result.

The Framework Travel Plan and associated documents would be secured by Section 106 planning obligation. We would seek pre-occupation interim documents then post-occupation full documents (including an updated operational Framework Travel Plan and individual Travel Plans/Travel Plan Statements) after the completion of the baseline travel surveys, to be repeated for each phase as the phased delivery of the proposed development progressed. For the present hybrid application, the

mechanism for future phases to be delivered with Reserved Matters would also be secured in the Section 106 agreement.

Outline Delivery and Servicing Plan

The loading bay requirements (based on the maximum parameters) should be derived from the delivery and servicing peak hour and be stated in the Outline Delivery and Servicing Plan (DSP).

For the present hybrid application, both an interim DSP and a Detailed DSP would be sought for the masterplan (including Plot A) to be produced respectively before occupation and post occupation (after the baseline delivery and servicing surveys undertaken within 6 months of first occupation). The mechanism for the DSP as part of future phases to be delivered with Reserved Matters applications would also be secured by planning condition.

The surveys would be carried out at the same time as the baseline travel surveys.

Outline Construction Environmental Management Plan

Revised Demolition and Construction Environmental Management Plan (DEMP/CEMP) would be submitted for each future RMA.

A Detailed Construction Logistics Plan (CLP) would be secured by planning condition for Plot A. Future RMAs would include Outline CLPs as part of revised CEMPs/DEMPs, and Detailed CLPs would subsequently be secured by planning condition associated with each RMA/phase of development.

Cycle storage would be provided on site for site operatives, with numbers to be reviewed against demand on a monthly basis. This is welcome.

It is understood that, at peak, 300 Lendlease and extended supply chain management staff to be present on site full time alongside circa 1,400 site operatives. The maximum number of on-site personnel would therefore be around 1,700 people on two occasions, in 2026 and 2028. The peak HGV traffic per month is expected to be attained in mid-2026 and late 2028 with 7,100 vehicle movements consisting of 4,300 HGV and 2,800 LGV movements. The peak year is expected to be 2028 with 14,780 movements. The Transport Assessment indicated that the impact of construction at peak would lead to fewer vehicles than the existing vehicle trip generation.

Due to the proximity of the site with a number of schools, every effort should be made to schedule deliveries and collections where construction traffic is to pass by schools outside school opening and times (namely 08:00-09:00 and 15:00-16:00). Generally, construction deliveries and collections should also be scheduled outside the local network peak hours. This should be reflected in future documents.

Environmental Statement

Clarification is sought on the definition of 'interim scenario'. At Paragraph 15.2.7, it is stated that it will be assessed in two future year scenarios (peak demolition and construction phase, and complete and occupied phase), however elsewhere in the document (Paragraph 15.1.5), it is stated that the interim scenario is the scenario whereby only the southern site is developed. What is the scenario whereby both southern and northern sites are developed, and has it not been used as a basis for the environmental impact assessment?

The receptor sensitivities are all set at a 'medium' level, which lacks subtlety:

- Pedestrians (including wheelchair users, people with pushchairs and people with mobility impairments) and cyclists are vulnerable road users and their sensitivity should be **high**. Any changes to conditions are likely to have a greater impact on them due to the time and effort required to travel on foot or by cycle.

- Drivers are not the only road users that should be included. As a more general and inclusive term, this category should be renamed 'Motorised vehicle users' (including private car, taxi, bus drivers, delivery and servicing vehicle drivers, construction vehicle drivers and any vehicle passengers but excluding bus passengers). All motorised vehicle users experience delays as a result of changes in traffic flows and changes in routes which may affect only a proportion of their journeys. As such, their sensitivity should remain **medium**, as already suggested.
- Bus passengers' sensitivity should be **medium** as they are sensitive to changes in traffic flows and routes which may affect only a proportion of their journeys.
- Rail users' sensitivity should be **medium** due to localised changes in passenger flows which may affect only a proportion of their journeys.

In Table 15.2, it is stated that, for amenity, fear and intimidation, the affected receptors include pedestrians, cyclists, bus and rail passengers. However, amenity, fear and intimidation do not normally apply to bus and rail passengers as they are already onboard services, only to pedestrians (including before and after using public transport services) and cyclists.

The list of impacts for assessment is fine and in line with the guidance, however as I indicated in early feedback (informal scoping opinion request and formal scoping opinion request – HGY/2021/2960) it would be welcome to assess an additional impact, which is road user on-street parking. As you know, parking is critical in this scheme and the impact of it deserves to be assessed, especially as the on-street parking stock would be significantly altered and a substantial number of on-street parking activity (whether on public or private roads) would be generated. The parking stress surveys carried out as part of the Transport Assessment would be a good starting point to establish a baseline, on which the assessment of the parking impact could be built for future year scenarios.

In light of the revised receptor sensitivities, and the effect scale matrix for the evaluation of significance, all likely significant effects, residual effects and residual cumulative effects should be reviewed to reassess the different impact groups of the proposed development. The review should also take account of the revised multi-modal trip generation assessment in the Transport Assessment (proposed and net alike).

For each impact (severance, delay etc), and in particular if the assessment of the magnitude of impact is qualitative as opposed to quantitative, it is important for the proposed magnitude of impact to be clearly stated, in line with Tables 15.4 and 15.5 of Chapter 15 of the October 2021 ES.

Recommended Section 106 Heads of Terms

- Car-free/capped development – both residential and commercial, including £5,000 towards the amendment of the local Traffic Management Order, excluding Council housing residents
- Car club:
 - o Car club provision (10No. on-site spaces)
 - o Establishment or operation of a car club scheme
 - o Contributions from developer to residents - two years' free membership for all residents and £50 (fifty pounds in credit) per year for the first 2 years and an enhanced car club membership for the residents of the family-sized units (3+ bedrooms) including 3 years' free membership and £100 (one hundred pounds in credit) per year for the first 3 years
- CPZ contributions to the ongoing review and expansion of existing Controlled Parking Zones – £60,000.
- Section 278 highway works agreement (scope and extent of works to be defined after obtaining a detailed Section 278 drawing for costing purposes)
- Commercial Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:

- Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
- Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new tenant/organisation
- Cyclist facilities (lockers, changing rooms, showers, drying rooms for the non-residential uses)
- Residential Travel Plan (including Interim and Full documents, monitoring reports and a £3,000 monitoring contribution) including:
 - Appointment of a Travel Plan Coordinator (to also be responsible for monitoring Delivery Servicing Plan)
 - Provision of welcome induction packs containing public transport and cycling/walking information, map and timetables to every new household
- Future Connectivity and Access Plan
- Enfield Traffic Management Order contribution - £20,000 (indicatively, based on past applications)
- Walking and cycling/transport infrastructure contributions towards the delivery of the Walking and Cycling Action Plan – £2.21 million, including:
 - Feasibility towards feasibility and design of the High Road (A1010) protected cycle track - £260,000
 - New zebra pedestrian crossing on Church Lane immediately north of Bruce Castle Park's gated entrance - £90,000
 - New zebra pedestrian crossing outside Haringey Sixth Form College on White Hart Lane - £90,000
 - Footway improvements along Pretoria Road North - £50,000
 - Wayfinding and Legible London type signage, to link in with borough-wide signage to Tottenham Hale - £150,000
 - White Hart Lane protected cycle track - £150,000
 - Strategic cycle link to the Lea Valley (including a range of public realm enhancements, traffic calming and greening) – £1,115,000
 - Street lighting and footway improvements (route under the railway bridge on Whitehall Street) outside of S.278 works - £120,000
 - Accident reduction strategy (covering clusters at the following locations: Bruce Grove/High Road, High Road/Pembury Road, High Road/Lansdowne Road/Lordship Lane, High Road/Cedar Road, White Hart Lane/High Road, Brunswick Square/High Road, White Hart Lane/Pretoria Road) - £150,000

Recommended Planning Conditions

- Public highway condition (before/after works)
- Cycle parking and access details
- Detailed Construction Logistics Plan
- Demolition/Construction Environmental Management Plans
- Delivery and Servicing Plan
- Car Parking Design and Management Plan (including the provision of electric vehicle charging points – both active and passive, space allocation strategy, wheelchair-accessible car parking)
- Combined Stage 1/2 Road Safety Audits along all shared surface lanes within the masterplan and for all new access points on White Hart Lane, the A1010 High Road, Brereton Road and Whitehall Street
- Basement Vehicular Access Control Arrangements (RMA stage)

- Highway stopping-up and diversion details

Regards,

Stéphane Pietrzak
Principal Transport Planning Officer
Haringey Council
River Park House, 225 High Road, London N22 8HQ

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16 March 2022

FAO Philip Elliot
Planning Support
Haringey Council
By Email:
planningsupport@haringey.gov.uk

Dear Sir,

High Road West N17 (HGY/2021/3175)

The CCG is concerned that the planning committee report doesn't fully reflect the CCG's comments, which were submitted on 28th January 2022.

We note that Appendix 2 'Internal External Consultees Representations' only includes page 1 of the CCG response and omits pages 2-3.

On page 2 of the response, we suggest that the legal agreement should include a requirement for a healthcare delivery plan to be submitted with the Reserved Matters Applications for Phase 2 which would identify, in consultation with the Council and CCG the location of the new health centre, the timing of provision and the design and specification. We understand that the intention is to provide the new facility as shell and core floorspace and as such additional capital investment will be needed to fit-out the new facility. In addition, the future rental level should be affordable to the CCG.

Paragraph 8.2 of the applicant's Planning Statement refers to third party ownerships within planning application boundary. The Tottenham Health Centre is owned by the GP practice. The Planning Statement indicates that the Council will seek commercial agreements from and with landowners to incorporate their interests into the wider scheme and will explore the option of Compulsory Purchase Order powers where necessary. The committee report does not specifically refer to the intention to purchase the health centre site. Whilst we support the proposed s106 heads of terms to secure the new healthcare facility to be in operation prior to demolition of the existing Tottenham Health Centre, we suggest that a healthcare delivery plan is needed to ensure the continuation of healthcare services and to ensure that the new health centre can be delivered, and additional capacity is provided to accommodate the additional demand generated by the development. We also suggest that there should be a mechanism to monitor and evaluate the construction impacts and mitigation measures to ensure that services delivered from the Tottenham Health Centre would not be disrupted during the construction stages.

We do not agree with the summary and conclusions in sections 7 and 11 of the report regarding healthcare impact and the need for mitigation. Paragraph 7.22 suggests that the replacement healthcare facility will meet the needs of the additional population without further mitigation. The healthcare facility will replace the floorspace lost if the Tottenham Health Centre is demolished. It does not provide the necessary additional floorspace needed to accommodate the additional demand. The report considers that the introduction of up to 6,410 additional residents into the area

would not have a significant adverse effect on primary healthcare provision (paragraph 30.5) and refers the Environmental Statement (ES) assessment in paragraph 11.11. The CCG considers that the proposed scheme would have a significant effect on primary healthcare provision in the north Tottenham area which is already under pressure. In fact, paragraph 14.5.18 of the ES states that, without mitigation, the assessment identifies a permanent, long-term and moderate adverse effect, which is significant in EIA terms. Paragraph 14.5.19 refers to the use of mitigation in the form of financial contributions in order to manage the additional demand created. With this mitigation in place, the effect of the proposed scheme on the provision of healthcare facilities is assessed as negligible, and therefore not significant.

Paragraph 30.5 of the committee report refers to the use of CIL payments to help fund additional provision. There is an identified significant site-specific impact which requires direct mitigation by way of a s106 contribution in addition to the replacement health facility. The CCG has requested a contribution of £3,073,120 which could be reviewed as part of the suggested healthcare delivery plan. The request for a s106 contribution would meet the tests in CIL Regulation 122 as it is considered necessary, reasonable and directly related to the development. CIL funding is not a material consideration in the determination of a planning application and CIL cannot be used to make the development acceptable in planning terms.

We would request that the planning committee is made aware of the above comments.

Yours faithfully,

NHS North Central London CCG

From: Sanclemente Juan
Sent: 16 March 2022 19:16
To: Elliott Philip
Cc: Andrew.Russell ; [Charleton Patricia](#)
[Dresner Melvyn \(ST\)](#)
Subject: High Road West (HGY/2021/3175) - TfL's additional comments

TfL Spatial Planning Reference: HRGY/21/70

Borough Reference: HGY/2021/3175

Location: High Road West, London, N17 8DP

Proposal: Hybrid planning application for the '1) outline component comprising the demolition of existing buildings and for the creation of a new mixed- use development including residential (Use Class C3), commercial, business and service (Use Class E), leisure (Use Class E), community uses (Use Class F1/F2) and Sui Generis uses together with the creation of a new public square, park and associated access, parking and public realm works with matters of layout, scale, appearance, landscaping and access within the site reserved for subsequent approval; and 2) detailed component comprising Plot A including the demolition of existing buildings and the creation of 60 residential units (Use Class C3) together with landscaping, parking and other associated works'.

Dear Philip,

Following my email on the 3rd March 2022, I write to provide additional comments in relation to the above planning application and more specifically the applicant's response to TfL's stage 1 detailed comments and issues that were raised. These comments are additional to any responses you may have previously received from my colleagues in infrastructure or asset protection and from TfL as a party with a property interest.

This response to the applicant relates to proposals, which comprise a detailed element (also known as 'Plot A') that consists of 60 residential dwellings and an outline element for which all matters except access are reserved. As previously indicated, the proposals are part of a comprehensive regeneration of High Road West that will deliver up to 2,929 residential dwellings and 36,000 sqm of non-residential floorspace.

Please note that following a review of the 'Report for Consideration at Planning Sub-Committee', in respect to bus services, I would like to draw to your attention that the presumption that 'the level of [bus passenger] intensification would not have a significant detrimental impact on the operations of the local bus network' is incorrect. Whilst TfL is satisfied that the proposals are unlikely to have a significant impact on the strategic road network and we also accept the verdict of the Transport Assessment that no mitigation is required at White Hart Lane station, given the effect of the recent congestion relief project that was completed at this station, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new

demand. As a result, it is expected that a S106 total contribution of £2,275,000 would be required. However, TfL is open to discuss appropriate trigger points that fit with the phasing of this development. Please refer to additional details below.

It should be further noted that these comments represent the view of TfL and are made entirely on a 'without prejudice' basis. They should not be taken to represent an indication of any subsequent Mayoral decision in relation to a planning application based on the proposed scheme. In addition, these comments do not necessarily represent the views of the GLA.

- **Ref 17 – Highway Impact – Completed Development**

Whilst TfL recognises that: 'a more robust uplift in residential trips generated by this development is unlikely to make a noticeable difference on the net impact of development proposals and to have a significant impact on the strategic road network', our position is that the applicant's team needs to demonstrate that highway modelling is not required. As previously indicated: 'a net reduction / zero increase in car trips and / or no significant changes to the street network need to be demonstrated [by the applicant] to assess the need for highway modelling'. It should be further emphasised that full consideration of the implications of the quantum of car parking to be delivered / car parking arrangements, should be incorporated. Furthermore, the application should consider the need to look at the overall net additional impact at each of the access points to determine if a capacity/modelling exercise (e.g. capacity of right turn bays on the highway) is required. This should be assessed in conjunction with the total number of servicing trips and cycle movements. This should be confirmed with the Council.

- **Ref 20 – Access and Delivery & Servicing Arrangements**

These matters are resolvable when the reserved matters applications come forward.

- **Ref 21 – Healthy Streets, Vision Zero, Walking and Cycling**

The clarification on the 10m offset between the building line and High Road is noted. Whilst it is accepted that this will contribute positively to improving pedestrian capacity and changing the sense of place along the High Road, TfL's observation primarily seeks to draw your attention to the importance of striking the right balance of objectives, particularly the transport and place-making objectives where there are large numbers of people. TfL welcomes that the applicant's team offers reassurance in relation to improved pedestrian capacity, landscape and public realm improvement that can be afforded and secured through future reserved matters stages. Notwithstanding this, consideration of the implications of a new desire line for high flows of people at certain times and future recommendations to protect the operation of the public transport infrastructure from new/conflicting movement routes, should be incorporated as part of future RMA(s). As previously alluded to, this should achieve seamless interface for sports fans with the A1010 High Road and consider connections to the stadium. These and other matters raised by TfL are resolvable when the reserved matters applications come forward.

- **Ref 22 – Car Parking (1)**

Taking into consideration site conditions and London Plan requirements, subject to the implementation of the lighting strategy and necessary improvements/pedestrian amenity being secured, the provision of on-street disabled persons' car parking spaces along Whitehall Street for the detailed element together with the access route under the bridge would be considered acceptable by TfL on this occasion. As the LB of Haringey is the local planning and highway authority, the Council should determine the acceptability of this approach. This matter is resolvable by condition.

- **Ref 23 – Car Parking (2)**

The clarification on charging facilities to be delivered through future RMA(s) is noted. TfL is pleased that the applicant has further acknowledged the requirements to comply with the London Plan policy T6. Electric Vehicle Charging Points including passive provision is expected to be secured by condition. These matters are resolvable when the reserved matters applications come forward and/or with an appropriate legal agreement.

- **Ref 24 – Cycle Parking**

Consistent with TfL's comments submitted via email on the 3rd March 2022, please see below.

'The London Plan Policy T5, sets out cycle parking standards to help remove barriers to cycling and create a healthy environment in which people choose to cycle. Considering the detailed element of the scheme and submitted plans for Plot A, TfL has concerns about the cycle parking, specifically building A1 and the lack of provision of spaces for larger cycles for long-stay cyclists. Given that the schedule of accommodation sets out that all wheelchair accessible homes will be contained within building A1, TfL encourage the applicant to review the cycle parking and incorporate adequate provision within building A1 to cater specifically for non-standard bicycles. This should consider riders of certain type of bicycles, including people who use handcycles, tricycles, tandems and models adapted to suit the rider's specific needs, as well as cargo cycles. Further consideration should also be given to short-stay cycle parking provision for buildings A2 and A3, as spaces for visitors located in the landscape, adjacent to building A1's entrance are too remote from other user destinations, particularly building A3's entrance. All cycle parking is required to be designed and laid out in accordance with the London Cycling Design Standards (LCDS).'

These issues are resolvable by planning condition and/or an appropriate legal agreement.

- **Ref 25 – Trip Generation and Highway and Public Transport Impact Assessment**

These clarifications are helpful. Whilst matters relating to trip generation inputs and the London Overground assessment are solved, updated bus trip generation figures reveal a significant uplift, and this is likely to require service enhancement to accommodate new demand. Subsequently, bus trip generation figures for the High Road West development proposal have been reviewed by TfL to determine where bus service improvements, including but not limited to capacity enhancements, are expected to be required in the future. Please

refer to the following details.

Route W3: Recent loading data shows that the busiest point in the AM peak is westbound between White Hart Lane and Wood Green. In the PM peak the busiest point is eastbound approaching White Hart Lane. TfL will continue to review the bus network, as demand changes in response to the pandemic and will aim to optimise capacity at the busiest point. The development is forecast to generate an additional 97 westbound trips in the AM peak hour and 72 eastbound trips in the PM peak hour. These figures exceed the planning capacity of 70 passengers per bus for double deck buses. Therefore, it is expected that a S106 contribution of £950,000 would be required to cover the cost of 2 additional return journeys on route W3 for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Route 149: Recent loading data shows that the busiest point in the AM peak is southbound on Tottenham High Road south of White Hart Lane. In the PM peak the busiest point is northbound in Haggerston. However, the load at a busy northbound point on Tottenham High Road in the PM peak has approximately only 40 fewer passengers than at the busiest point. If TfL optimises capacity based on the busiest point in the PM peak hour, assuming a similar difference in load, there would be surplus capacity of approximately 30 spaces close to the development. The development is forecast to generate an additional 94 southbound trips in the AM peak hour and 70 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £850,000 would be required to cover the cost of 1 additional return journey and 1 additional single journey on route 149 for a period of 5 years (£75,000 per single journey and £95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Route 259: Recent loading data shows that the busiest point in the AM peak is southbound at Woodberry Down. However, the load at the busiest point is approximately only 35 passengers higher than at the busy point on Tottenham High Road. In the PM peak the busiest point is northbound on Tottenham High Road. The development is forecast to generate an additional 74 southbound trips in the AM peak hour and 55 northbound trips in the PM peak hour. Therefore, it is expected that a S106 contribution of £475,000 would be required to cover the cost of 1 additional return journey for a period of 5 years (£95,000 per return journey per annum). While new demand is expected to be greater in the counter-peak direction in both the AM and PM peak hours, it is expected that there would be sufficient capacity to accommodate the increase.

Routes 279 and 349: It is forecast that the development will generate demand for both routes; and while it is entirely possible that service enhancements may be required in the longer term, it is accepted that there is greater uncertainty about the requirement for additional capacity given the forecast peak hour demand being less than that of the planning capacity for a single bus. Therefore, no contributions are being requested for either route at this stage.

Based on the outcome of this bus impact assessment review, it is expected that a S106 total contribution of £2,275,000 would be required. It should be noted that contributions should not be route specific as TfL is continuing to review the network and route numbers may be subject

to change.

- **Ref 26 – TfL Technical Approval and Infrastructure Protection**

These clarifications are helpful. This matter is resolved.

- **Ref 27 – Travel Plan**

This matter is resolvable with an appropriate legal agreement.

- **Ref 28 – Delivery and Servicing and Construction Logistics**

This matter is resolvable with an appropriate legal agreement.

I hope these comments are helpful. Please do not hesitate to contact me if you would like to discuss further any of the issues raised above.

Kind regards,

Juan

Juan Sanclemente

Area Planner | TfL Spatial Planning - City Planning

Email:

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