

Appendix 4: Consultation Responses from internal and external agencies

Stakeholder	Question/Comment	Response
INTERNAL		
LBH Building Control	<p>With regards to the assessment of the Fire Strategy and B5 of the Building Regulations, Building Control have no objections/representations to raise against the proposed changes. The proposal will be subject to a formal Building Regulations application where all parts of the requirements of the Building Regulations shall be assessed.</p> <p>Additional comments received 28 November 2023:</p> <p>I have spoken to THFC about this and work is underway to provide the supporting figures to justify the proposals. They have employed a specialist movement company with a good track record in doing this (unfortunately it is not the same company that carried out the work initially, hence the slight delay as they are having the check and ratify the base figures in order that they can clearly and accurately compare the proposed scenario).</p> <p>Essentially, whatever width is removed from the current staircases to allow the construction will be reinstated further down Park Lane, please rest assured that this will be covered by their safety certificate and if they cannot get the numbers to work, then they run the risk of having their capacity reduced.</p>	<p>Comments noted. The crowd flows issue will need to be addressed outside of planning. Any changes to widths of stairs would likely require non-material amendment to the permission.</p>
LBH Carbon Management	<p><i>No comments received to date, but full response being provided when additional information has been reviewed. GLA officer have reviewed prior to publication of the report This will be added in the addendum ahead of planning Committee.</i></p>	
LBH Conservation Officer	<p>The proposed scheme forms part of the phased Northumberland Park Development project that entails the redevelopment of the land comprising and surrounding the Tottenham Hotspur Stadium.</p> <p>The extensive redevelopment scheme, stemming from outdated 2011 planning, conservation area and listed building consents, was approved in 2016, and includes</p>	<p>Comments noted.</p>

the now completed Stadium and Tottenham Experience; full consent was granted for both the 22-storey mixed use hotel tower and for the forthcoming sports centre. Outline consent was granted for the Extreme Sports Building as well as for four residential towers and for the Community Health Building. Those buildings that were approved through outline consents will all be developed at a later stage.

This Section 73 application entails amendments to the massing of the hotel tower becoming taller and slenderer, with a slight increase in floorspace for hotel use. The mixed-use hotel tower will be located to the immediate south of the new Stadium and to the east of the Tottenham Experience, on a prominent corner location, just on the doorstep of the North Tottenham Conservation Area. While signposting the wider redevelopment, especially in views along and across The High Road, the tower and related landscape design will also define the new street frontage and urban landscape along the corner of Park Lane, near the Conservation Area. Due to its landmark location and scale, the new tower is set to further mark the jump in scale and neat diversity of character between the new Northumberland Park Development and the Conservation Area, and at the same time to reinforce the new urban character and very contemporary townscape already established by the Stadium and Tottenham Experience on the land comprised between the High Road and Park Lane.

In very close proximity to the hotel tower and just on the opposite side of Park Lane, the Conservation Area is characterised by the historic Corner Pin pub and the locally listed buildings at Nos 2-4 Park lane, all forming part of, and positively contributing to the special character of the Conservation Area.

To the immediate north of the development site the Grade II Listed Warmington House, is nowadays embedded within the Tottenham Experience and has totally lost its original built context. The listed building is architecturally and historically significant on its own merits, but its former setting, constituted by the historic east frontage of the high street that preceded the creation of the Stadium has now totally changed and is still evolving.

Both the 2016 consented redevelopments of both the Stadium and related land to the east side of the High Road, and the extensive High Road West masterplan for extensive redevelopment to the west side of the High Road, led to remove from the Conservation Area both the originally designated east land comprised between Park lane and Northumberland terrace, and the originally designated land broadly comprised between Brereton Road and Moselle Place to the west.

This odd gap in the Conservation Area designation is due to the total loss of historic character and radical transformation of the High Road frontage due to the Northumberland Park and the HRW re-developments in North Tottenham.

The ongoing transformation on both sides of the High Road, adjacent to the rest of the North Tottenham Conservation Area and related heritage assets, is therefore a consolidated decision and part of the council's commitment to regenerate and enhance the quality of North Tottenham, with the imposing Stadium intended as a driver for new development, related economic regeneration and descending public benefits.

It is understood that the approved large scale development is totally different from, at best complementary to, the historic built environment of the Conservation Area, and this new development leads to varying degrees of less than substantial harm to heritage assets; however, the identified harm caused by the Northumberland Park Development has been accepted in the 2016 consent as adequately mitigated by a number of factors (distance, screening greenery, urban design quality and architectural composition quality) and it is expected, both for mitigation of impact and in compliance with national and local policies, that this development will have to deliver maximum architectural, landscape and urban design quality achievable, as well as to deliver all the benefits attached to its justification and approval. Accordingly, The current application to amend the hotel tower ambitiously aims to fill in the gaps of the consented tower scheme and takes the opportunity to maximise urban and architectural quality and to deliver greater public benefits within heritage setting.

The design quality and urban character of the Northumberland Park Development have already been established on the east side of the High Road by the design of the Stadium that, together with the Tottenham Experience, boasts a strong presence on the east frontage of the High Road and related skyline. As part of the redevelopment surrounding the Stadium, the consented tower is meant to complement and emphasize the design, large and curved geometry, and the materials of the Stadium so that both buildings would form a complementary landmark development. The tower was already designed in the consented application to perform as a tall architectural signpost, standing on a pivotal corner location at the crossroad between the High road and Park lane and thus marking the presence of both Stadium and the whole Northumberland Park Development in various views towards the development site.

The heritage statement accompanying the 2016 consent stated at paragraph 4.4.27 that the tower would provide "a striking and elegant new landmark building at the gateway to the Stadium site " and that although" positioned closer to the High Road and the boundary of the North Tottenham Conservation Area, it would only affect the immediate setting of Warmington House at 744 High Road. Despite the obvious difference in scale between the proposed hotel and Warmington House, the hotel would not harm the significance of the listed building because, as described above, its setting has been entirely altered and has no remaining intrinsic significance."

The 2016 consent therefore established that the 22 storey tall hotel building , despite being clearly visible within the wider setting of nearby listed buildings in the North Tottenham Conservation Area, comprising the Grade-II listed Moselle House and the listed Tottenham Baptist Chapel and 695-697 High Road, does not harm the significance of the listed buildings since these are located on their own, defined plots set back from the pavement line of the High Road.

That consent also established that in north views along the High Road from the Scotland Green and Bruce Grove Conservation Areas, both the Stadium and the hotel would have a positive and balancing impact on the overall urban composition of the entire development site despite causing some 'less than substantial harm' to the wider setting of the conservation areas. But the harm would

be mitigated by distance, the existing urban form, trees lining the High Road and by the proposed high-quality design and chamfered form of the towers. The impact on Bruce Castle Conservation Area would result in some 'less than substantial harm' to the wider setting of the Bruce Castle Conservation Area in views from the northern end of Bruce Castle Park. And the harm would be partly mitigated in the summer months by leafy trees.

It was therefore concluded that the less than substantial harm caused by the wider new development comprising the hotel tower, on the setting of the surrounding Conservation Areas, is reduced by several factors, including good design, and the descending harm needs to be balanced against the public benefits provided by the development.

Great emphasis was placed on the design quality of the proposed new development and related improvements to the surrounding public realm and landscaping, both in mitigation of heritage impact and in compliance with national and local policies for good design.

Within this frame, this design led S73 application strives to enhance the intrinsic design quality of the hotel tower through changes to the height, design, maximum floorspace of the tower and related public realm and landscaping, while increasing deliverability and achieving a better internal layout for both hotel and residential units and by adding private outdoor amenity space to each residential unit. Accordingly, the footprint and the housing mix of the building have been amended.

The proposed amendments effectively help to refine the appearance of the tower as a distinctive, elegantly slender landmark building so to successfully complement and emphasize the large and curvy geometry of the Stadium and to add character to the skyline of the wider redevelopment site as experienced in views of the area.

These refinements to the design of the tower rest on a thorough analysis of both the approved scheme and the evolving scale of the emerging context, with a string focus on perfecting the design of the tower, also with the help of comprehensive pre and post application discussion with officers, Quality Review Panel and consultation with the Greater London Authority so to finalise the design of the building, proposed

landscaping and the overall sustainability approach of the hotel site. The design merits of the amended scheme are extensively described and assessed in the Design Officer's comments that focuses, among other considerations, on the design quality achieved by this refined scheme, townscape impact and benefits of the proposed design. From the heritage conservation perspective it is also necessary to consider how the enhanced tower design would impact on the surrounding heritage assets, while being mindful that heritage impact assessment carried out in the 2016 consent in relation to a lower tower established that the impact of the new tower was acceptable due to its subordination and being largely screened from the stadium, and also due to its balancing role in the urban composition of the new development. In that consent it also emerged very clearly that design quality is the key mitigation measure to further reduce the heritage impact of the tower and to comply with the policy requirement to raise the quality of the setting of heritage assets through good design.

The height of the tower has now been increased from 22 to 29 storeys, still in compliance with the maximum approved heights and related number of storeys and in line with recently approved new schemes to be erected on the west side of the High Road . This increase in height is justified by the design need to re-allocate masses and usable spaces to shape a slender and elegant tall building , but also by reducing its breadth and by emphasizing its vertical geometry; mass has been broken down to achieve a slender, tiered and multifaceted building whose elevations are defined by a carefully composed hierarchy of tall, planar blades and lower, folded vertical blades arranged to follow the polygonal and elongated plan form of the tower that is akin to the plan form of the Tottenham Experience building. The varying height of the blades reflects the vertical hierarchy of the tower that is tied together by a lower shoulder shaped by the 'folded blades' wrapping around the ascending middle and top sections of the tower. The lower 'folded blades' shoulder anchors the tower within the Park Lane frontage and related public realm and landscape design connect the tower to the podium of the Stadium that is accessible from the stairs either side of the hotel plot thus creating a flowing sequence of public realm at ground level. The slender shape of the hotel as seen in north-south views in the consented application, is now enhanced through the sophisticated geometry

of the angled 'blades' in combination with the increased height. The proposed taller tower will also benefit from a reduction in the originally approved breadth to east and west elevations, thus rebalancing the proportions and adding consistent elegance to the overall appearance of the hotel tower as experienced in views along the High Road frontage and in east- west views towards the development site. The proposed increase in the building's height is a well thought out and fundamental design choice to improve the built proportions of the approved hotel tower, to reinforce its architectural and urban relationship with the Stadium and Tottenham Experience, to enhance daylight penetration to the ground and podium levels, and ultimately, to achieve the ambitious aerial silhouette of a contemporary landmark to the Northumberland Park development within the townscape views.

The amendments to the tower have been comprehensively developed and detailed to hone the design quality, energy efficiency, fire safety and sustainability of the hotel tower while re-testing its impact on the surrounding heritage assets in comparison to the effects produced by the consented tower. Accordingly, this application illustrates the quality of both internal and external enhancements to the tower, surrounding public realm and landscape design and descending benefits.

The crowning section of the tower has been thoroughly and coherently refined together with the distinctive façade design, so that the variously angled ' blades' forming the wider elevations have been extended up to and slightly beyond the top of the building and have been masterfully mirrored, angled, concluded with a 'lantern' at the apex, to achieve a spire like, progressively more lightweight termination to the tower when viewed from the south along the High Road. The whole building appears as a slender and angled architectural 'origami' reaching towards the sky and leading the eye upwards, from the base of the building to the top. The façade design has been developed concurrently with design refinements to the internal layout and aspect of the units as well as to the façade detail and lighting. The proposed lighting strategy and specifically the halo illumination to the upper parts of the blades contributes to convey the desired sense of material lightness and visual permeability of the crown of the building, as also conveyed by the projecting fins.

The residential balconies, legible as setback in fills to the folding blades of the tower's shoulder, will feature a bronze finish balustrade to match. An upstand will be located inside the balustrade to conceal the freestanding planters so to allow full legibility of the carefully detailed geometry and materiality of the building that will feature on the planar facades a combination of polished, matte and brushed solid aluminium panels, solid openable panels within all habitable rooms, glazing only where vision panels are required and rationalisation of all wall types by reducing the amount of glazing. The top floor of the south elevation of the tower will benefit from a double height tall screen made of fins in bronze finish to balcony space of the penthouse, so to match those balcony balustrades to floors below while creating a lighter appearance to the massing of the tower. The 'crown' to the top of the building will conceal maintenance and plant equipment, photovoltaic panels, and lift core and overruns .

The tower also incorporates a residential amenity terrace directly connected with the vertical core so that residents can directly access without the need to pass through other internal spaces.

The number of hotel rooms spanning Levels 02-11 has been reduced per floor with no change to the approved total number, and the hotel amenity spaces have also been improved through reorientation of the pool located on the top of the tower shoulder to maximise views towards Central London. The Amenity floors of the hotel have been accentuated and expressed through double height façade panels to reflect the arrangement of these floors, and the related, double height internal lighting with further contribute at night to mark the mid floors of the hotel.

The lower section of the hotel tower will rest on a sculptural plinth made of light grey pre-cast concrete panels and glazing where way finding totems and signage have been integrated into the design of the tower, in line with the Stadium wayfinding strategy, so to minimise any visual clutter within the public realm. Together with the careful articulation of entrances and the landscaping of both ground floor and podium level, the plinth aims to unify the ground level of the hotel tower and the podium level of the Stadium, thus reinforcing the spatial relationship and continuity among the

public realm and landscape of the hotel to ground floor, its entrance porch and the podium level leading to the Stadium.

The design of the entrance to the hotel, with its bright colonnade defined by large, glazed spans to the ground floor facade behind the sculptural light grey concrete columns and canopy, creates an elegant and inviting plaza that seamlessly connects to both the public realm and to the tower through a hierarchy of curtain wall entrances for hotel and residential access and recessed back of house entrances. These amendments to the design of the base of the tower will ensure that the entrances to hotel and residential units are immediately legible behind the spacious colonnade at street level, work as a lantern underneath the canopy and improve the physical and visual connections between public realm hotel tower and related landscape.

The improvements to the landscape design and public realm surrounding the tower have enhanced the integration of the tower site with has also been improved following comments from LBH officers and the QRP. In summary, the landscape and public realm has been updated to better integrate with the wider public realm within the Stadium site. Additional planting is proposed on the east and west elevations and the introduction of two 'green walls' is proposed. The ground floor layout has been successfully developed so that the outdoor amenity space for residents is always fully accessible.

These design improvements emphasize the multiple purposes of the tower, as well as its multifaceted character and appearance that is robustly grounded into and connected to the street level; the tower is also connected to the Stadium at podium level, and more lightly projects towards the sky in its landmark capacity which is fully expressed through its vertical architectural hierarchy as described above.

As convincingly explained in the D&A Addendum , "the similar materiality to the Stadium further connects the base of the building within the Stadium family of buildings, unifying the architectural language of its surrounding context." Also, the large use of light-coloured concrete to ground floor of the tower opens various opportunities to integrate meaningful artwork from local creative arts communities that will be involved in this project as part of community involvement and to support

the local creative economy. The podium terrace will be enhanced by vertical planting to pre-cast panels, generous planters and glazed balustrades and soft landscaping to create comfortable spaces and to soften the hard materiality of the hotel plinth. This landscape design will improve the activation of the podium level and will increase the visual permeability towards the terrace where local artwork will be showcased to reflect the culture of the local community and is bespoke to the evolving character of Tottenham.

Permanent or temporary artwork will be potentially showcased on the internal hotel lobby wall; on south and walls; on screen and planter, or outside the main entrance thus contributing to shape the urban identity of the hotel tower.

The landscape design and public realm surrounding the tower aim to provide an attractive and comfortable space constituted by high quality paving finishes that will incorporate the wider paving design for the public realm and will respond to the design of the hotel entrance.

Tress and planters that complement the new proportions and spatial arrangements of the ground floor level of the hotel façade. Similarly, the soft landscaped design will continue the podium terrace where the proposal is to create an attractive and comfortable environment both through high quality paving finishes and by means of trees, planting, planters, and vertical greenery with glazed balustrades to define the dining terraces.

The proposed amendments to the consented tower, both when read in isolation and in their totality, appear comprehensive, well justified, well thought through and promise to deliver a very high quality building and landscape design that will keep up with the intended uniqueness and high design quality of the Stadium: these are, together with the descending public benefits of the enhanced tower design, the fundamental requirements for such an innovative, yet very imposing type of development to be allowed to exist in the setting of a number of heritage assets . The proposed architectural expression and massing of the tower appear convincing within their contemporary setting, both existing and emerging; the proposed tower design holistically and successfully addresses building design and efficiency,

entrance legibility, user and residential experience and amenity, sustainability and energy performance in accordance with national, strategic, and local policies.

On the basis of its enhanced design quality, this revised 29 storeys scheme has been assessed for visual impact through 15 verified views taken from the surrounding area, including the North Tottenham Conservation Area, Tottenham Cemetery and Bruce Castle Park and including heritage assets in the view, heritage assets as visual receptors and emerging schemes; the impact of the revised tower is illustrated in the submitted Environmental Statement Addendum Supplementary Note and it is accepted from the conservation perspective that the amended tower design, despite its increase in height, does not cause any further harm to the significance of the surrounding heritage assets as previously assessed in relation to the consented design proposal for the hotel tower.

The key changes to the appearance of the hotel tower in views of the proposed development to and from the surrounding heritage assets are its taller and slender silhouette, and in terms of materiality the multifaceted, planar, anodised-effect elevational treatment, and the complementary light bronze, projecting mullions and fins to lower shoulder; the south-facing tallest point of the angled crowning blades, the top of tower 'lantern' and matching balustrades to balconies of south elevation.

It is agreed, as stated in the application, that in almost all of the views tested, the hotel tower would be seen alongside the Stadium as a well-integrated urban composition of distinctive contemporary architectures and that the hotel successfully fulfils the intended complementary and signposting function in relation to the Stadium, where its vertical line and the horizontal emphasis of the Stadium have been designed to complement each other, as shown in north and south views of The High Road, and views of the site across Brereton Road, but it also optimally performs as an urban landmark for the wider Northumberland Park Development, as shown in views towards the development site from Bruce Grove, Tottenham Cemetery and Bruce Castle Conservation Areas.

The accurate views effectively show that where the Hotel is seen from or alongside those designated or non designated heritage buildings forming part of conservation

area townscapes or part of non-designated streetscapes, it still reads as a totally distinct, discrete and slender piece of architecture, located in the far background of those most important heritage assets, as it happens in views of Northumberland terrace along the High Road, where the top of the tower appears behind the Stadium, therefore not affecting the legibility and visual primacy of listed buildings and of the historic street frontage of the North Tottenham Conservation Area. For these reasons, the increase in height doesn't seem to lead to any worse impact than that already assessed for the lower 22 storey towers.

However, it is not possible to concur with the ES Addendum appendix 8.2, paragraph 9.6.42 stating that "the proposed hotel tower at the southern boundary of the site would be a significant new element in the townscape that will enhance the North Tottenham Conservation Area and wider area, providing a landmark both for the southern entrance to the Stadium and to this part of the historic High Road heading north from London. In views north and south along the High Road (and its continuation, Fore Street further north) its narrow southern and northern ends would form an elegant marker, forming a pleasing contrast between its vertical line and the horizontal emphasis of the proposed Stadium."

With the 2016 consent it was clearly established that large scale, high-rise, unprecedented and contemporary design, superseding part of the North Tottenham Conservation Area and related heritage buildings, is necessary and acceptable as a catalyst for simultaneous urban, and socio-economic regeneration; it was established that the impact of the new development on the North Tottenham Conservation Area and other heritage assets results in less than substantial harm that is mitigated by the high calibre design quality of the new development that enhances the nearby townscape character areas and related townscape views. It is useful to note how the focus of the assessment was placed on the impact of the new development on urban character instead of prioritising the impact on heritage character. The design quality of the consented scheme and descending benefits were the primary focus of that consent. The Northumberland Park project was likely never conceived as a heritage-led regeneration scheme, and its large scale and prominent visibility were deliberately meant to impose and celebrate a radical urban

change in north Tottenham through new development which was meant to be totally different from and unrelated to the scale, form, building line and skyline of the historic High Road and related Conservation Area.

Indeed, the master plan and urban composition of the Northumberland Park development, including the Stadium and the hotel tower were designed and consented to totally supersede the urban scale, architecture, and historic character of the middle section of the originally continuous and linear east side of the North Tottenham Conservation Area. At the same time, and concurrently with the High Road West masterplan set to override also the west side of the middle section of the Conservation Area, the Northumberland Park redevelopment, as much as extensively justified, has contributed to the irreversible loss of heritage assets and historic character of part of the High Road, and the concerns expressed by Historic England about the risk of exacerbating the impact on the character and significance of heritage assets with an even taller tower, are rooted in fundamental, original concerns that pre-date this design revision for the tower and relate instead to the overall scale of the Northumberland Park development and its overriding effect on heritage buildings and their Conservation Area.

Within this frame, it is acknowledged that by virtue of the proposed design amendments the hotel tower can be beautifully designed and detailed, can better contribute to the urban quality of the emerging new developments in Tottenham and can certainly work well as a landmark for the Stadium and associated development where it belongs to. But the tower and all its development are not representative of and will not provide any information about the location, scale, historic, urban, and architectural qualities of the conservation area and its heritage buildings; the tower will instead signpost exactly that part of the High Road where the middle section of the original North Tottenham Conservation Area has been erased.

The council vision for the area, related planning decisions and attached conservation position are understood and acknowledged and constitute the planning frame to assess the proposed improvements to the design quality of the tower building and related landscape design.

However, the greatest and irreversible impact of the Northumberland Park redevelopment on the setting and significance of heritage assets has already occurred, and from the heritage conservation stance, this design proposal can only help to further mitigate the impact of the new development on its heritage setting through exceptionally good design .

Accordingly, and as proposed in this thorough and well-informed S73 application, the most heritage sensitive approach to new development, in such circumstances, is effectively to maximise its design quality and strengthen its contemporary urban character so to ensure that a truly excellent new hotel tower that sets a high bar for forthcoming new developments and reaps the highest possible regeneration benefits. Importantly, some of the most recent applications for new development on nearby sites located in the setting of the Stadium have successfully demonstrated how a well-informed, heritage-sensitive approach to new development in heritage setting can deliver high quality contemporary design with minimum or even no harm to heritage assets; in this case the heritage-sensitive approach has been successfully embraced through the pursuit of imaginative and exceptional contemporary design for the hotel tower.

It is felt that the proposed amendments to the tower successfully achieve a much higher design quality as originally consented and will deliver the greatest benefits within the emerging context of the wider redevelopment of this part of North Tottenham. The enhanced design of the tower fully supports the vision of the original permission to provide investment and support for the wider growth of this part of North London. The design process has been flanked by continued engagement with local stakeholders to understand how the community can be actively engaged in the enhancement of this building through artistic expression in the public environment.

The responses and the insights of the consultation process have steered the design development stages and have resulted in a better performing building, that connects with its contemporary context without unjustifiably and excessively harming the significance of surrounding heritage assets.

	<p>Concurring with the specialist heritage and visual impact assessments supporting the submitted application, it is felt that scale, mass and height the proposed increase in height and more slender form of the hotel tower would not introduce any outstanding or more impactful visual presence in views of the wider development site to, from or across heritage assets; in many of the views, the hotel tower and the other consented residential towers would be seen as buildings of a similar height forming part of the Northumberland Park Development as shown in views of the development site from Tottenham Cemetery, Bruce Castle Park, and from Bruce Grove looking towards Edmanson Close, and views from Bromley Road towards the development site.</p> <p>As demonstrated in the comparative views included in the Environmental Statement addendum, the amended hotel tower, when compared with the consented tower in heritage views, would have similar effects on the significance and appreciation of the heritage assets and it is accepted that large scale new development can form part of in the visual setting of heritage assets without compromising their significance . The proposed changes to the proportions, façade design and materials of the hotel tower would not result in additional effects on the views and significance of the heritage assets assessed in the consented scheme and it is possible to conclude, as per revised Environmental Statement supporting this application, that the impact of proposed development on the setting of heritage assets will lead to less than substantial harm and the erection of the amended tower within the setting of those heritage assets is still acceptable according to the principles established by the consented 2016 scheme.</p>	
<p>LBH Design Officer</p>	<p><u>Site & Application Context</u></p> <p>The application site forms part of the ongoing phased redevelopment of the Tottenham Hotspur Stadium and associated surrounding land. This was granted as a hybrid (part full permission and part outline permission) by Haringey in 2016 (HGY/2015/3000). The phased redevelopment includes the Tottenham Hotspur Stadium, Tottenham Experience, hotel and sports centre ('The Extreme Sports Building') and four residential towers, connected by a shared podium.</p>	<p>Noted and conditions reiterated from previous approval</p>

The specific site for this specific proposal is located south-west of the new stadium on the junction of Park Lane and High Road and is referred to as Plot 3 in the hybrid permission. The site is adjacent to Tottenham High Road / North Tottenham Conservation Area, so would affect this setting. The Grade II Listed Warmington House (no.744 High Road) is located north-west of the site, incorporated into the Tottenham Experience building, which formed part of the 2016 permission and has been substantially developed. There are other locally listed buildings in the vicinity, including the Corner Pin pub opposite the site. The recently approved High Road West redevelopment, is located to the west of the site and has permission for substantial masterplan redevelopment, under reference HGY/2021/3175.

The site of this proposal, Plot 3, was approved as a 22 storey tower to accommodate new 180 bedroom hotel with an additional 49 serviced apartments. A non-material amendment application was approved in HGY/2017/1183 for the removal of the condition restricting the serviced apartments to 90 days and allowing those 49 apartments to have a more conventional residential (C3) use. Although the site has been referred to as the 'hotel' it is more accurately a mixed use hotel and residential tower, as per the approved amendment.

Early pre-application discussions on this proposal included changes to the Extreme Sports Centre on Plot 4, but this has not been progressed and, for the purposes of this application, is assumed to remain as per the original approval.

The hybrid permission for HGY/2015/3000 in full was for the following:

The detailed element of the hybrid consent granted permission in full for the demolition of the existing stadium and club shop, three locally listed buildings (746, 748 and 750 High Road), and a terrace of seven houses (20 to 32 (evens) Worcester Avenue and the construction of the following:

- Plot 1 - A new 61,000 seat stadium and surrounding public realm works.
- Plot 2 - 'The Tottenham Experience', a multi-use building incorporating the Grade II Listed Warmington House and comprising the club megastore,

stadium ticket office, museum, club cinema, café, stadium tour and 'Skywalk' reception area.

- **Plot 3 - A 22-storey hotel comprising 180 bedrooms and 49 serviced apartments.**

Outline planning permission was granted for the following:

- Plot 4 - The Extreme Sports building (Class D2) providing up to 2500 m2 of floor space in a structure up to a maximum height of 51.2 metres. Detailed approval was granted for matters relating to "access" and "layout", with matters relating to "appearance" and "scale" reserved. (Application relating to "scale" submitted concurrently with this application Ref HGY/2021/1039.
- Plot 5 – Residential development and flexible community/office space (Class D1/B1) comprising 4 residential towers (2 blocks up to 16 storeys (69m) in height above podium level; 1 block up to 24 storeys (96m) in height above podium level; and 1 block up to 32 storeys (123m) in height above podium level) providing a maximum residential floor space of 49,000 m2 or a maximum of 585 units, and the construction of 4,000 m2 flexible community (Class D1)/office (Class B1) floorspace in the lower floors of the podium below the residential blocks in the SE corner of the site. Detailed approval was granted for matters relating to "access", "layout" and "scale", with matters relating to "appearance" and "landscape" reserved.
- Plot 6 - The Community Health Building (Class D1). Detailed approval was granted for matters relating to "access", "layout" and "scale" with only matters relating to "appearance" reserved.

Proposals

This proposal seeks an increase in height of the hotel building (plot 3) from 23 to 29 storeys, an increase of 27m to 127.2 AOD. The new tower will provide 27,378 sqm floorspace for hotel and residential use, an increase from the approved 19,835 sqm. The number of hotel rooms and of residential flats remains the same, but the

size of communal shared facilities for both the hotel and residential, and of the residential units, are increased. This will provide better facilities for hotel guests, residents and the (paying) general public, as the hotel and “club” facilities will be open to non-residents (the “club” being a series of health and leisure facilities on the middle floors).

The proposed appearance is as a sleek, abstracted series of blades or planes, predominantly of glass and silver metallic cladding, although rising out of lower planes of solid brown, copper-coloured cladding interspersed with glass. This represents an elaboration on the more glass dominated design of the approved hotel, whilst retaining its abstract palette and principles of composition.

Height, Bulk & Massing

This is a substantial increase in height, but the applicants have convincingly shown that the increase will not cause it to stand out significantly from or rise above the emerging cluster of tall buildings in the vicinity; it will remain lower than the tallest residential tower in the residential quarter of the wider stadium development, Plot 5, and will only be very slightly taller than the tallest buildings in the recently permitted High Road West development. Both of these have not yet commenced on site, but both have recently at least begun to discuss reserved matters and seek to discharge pre-commencement conditions with the planning authority. Furthermore, the other approved tall buildings in both developments are already certain to form a tall building cluster, and this hotel of increased height will just form one more tall building in the cluster.

The applicants’ team have updated the views assessed for townscape and visual impact as part of the original application with this taller proposal, and found that in some views the proposal is more visible. From the north, there are some views into which it appears when it did not before, over the roof of the stadium, but would not be prominent, and in many cases where it does become visible, it would accompany the already visible tallest residential tower. In several views from the south, including sensitive views from the Tottenham High Road Historic Corridor, this proposed hotel would become more visible than the approved version, but as it would already be

visible, and as in many cases the stadium is also visible, so it is not a “pristine” heritage view, whilst the taller, slenderer tower now proposed would be more effective in acting as a waymarker for the stadium, a beneficial effect of a tall building.

In views from the east and west, this new design will appear significantly slenderer than the approved design, representing a major improvement in its appearance. As a tall, thinner tower with a distinctive angled blade profile to its top and expressive counter-angled transition at mid-point, it will look much more elegant from these directions than the approved design, almost as wide as it was tall, would have been. Notwithstanding that though, in more distant views from the west, this proposal will eventually be largely hidden by the High Road West development, whilst from the east the residential towers of the stadium masterplan will hide it.

Design Composition, Fenestration & Balconies

This new proposal significantly improves the three-dimensional design composition over the approved, with a strongly, contrastingly expressed base, middle and top, and with the middle split at around its mid-point into contrasting elements. The upper part, cladding the residential part of the proposed building, is that which builds most closely on the approved design, made up of sleek glass blades; at their top these “peel” back to reveal roof terraces to some of the top, “penthouse” flats and an inner more dramatically sloped topping element. At this middle to top transition, as at other transition points, the transition is also sloped, generally in the opposite direction, adding to the drama of the composition as a whole and to the expression here of the top of the tower.

The middle transition is also sloped and marks the change to the darker, browner, copper clad element covering the hotel floors, stepping out to form terraces for the club and residential shared amenities. The transition from lower-middle to upper-middle aligns with the stadium roofline and will align with other emerging mid-rise schemes including the closer, lower blocks of High Road West, implying the glass upper element of this tower rising out of a heavier, darker datum. This lower-middle itself sits atop a one-to-two storey base, related more to the ground, in light grey

concrete similar to that on the base of the stadium, relating to and following the slope of the steps to the podium, and linked to the walls of the podium immediately east of the hotel. Despite the base being in a heavy material, concrete, it is as light as possible, sitting in from the bronze cladding above, and as open as possible to glazing and the open arcade along the street frontage to the hotel and club entrance, residential entrance, podium stairs and carpark entrance.

Fenestration supports the abstract composition of sleek blades, being as flush as possible with the solid cladding, separated by slight, thin vertical fins to structure the façade, form joints and sun screening whilst maintaining the primacy of the overall composition, into which fenestration disappears, and as a series of continuous vertical stripes of glazing within the copper cladding to the hotel floors. These pretty much hide any expression of individual floors, reducing the apparent height of the appearance of the proposed building, and emphasising its overall sculptural form over individual floors or windows. The only substantial disruption comes at the intersection of the blades or planes, a slight recess at the slight angle change mid-way across the eastern and western sides and a deep, richly modelled recess at the sharp angle change at the narrow prow at the northern and southern ends. In the upper residential floors these latter each house deep, generous balconies and their balustrades provide a contrasting horizontality, incorporating planters for residents gardening skills in in a darker bronze colour like that of the lower cladding.

The material palette promises to be robust, attractive and complimentary to the rest of the stadium development, with several being already used or very similar to those already used on the stadium itself or on associated buildings, adding to this proposal's complimentary design to this landmark development, subject to physical samples being approved by condition.

Landscaping & Public Realm

These proposals include amendments to the public realm around the proposed hotel, both at street level to Park Lane at its junction with the High Road, and to the podium around the stadium. The original proposals, the hybrid planning permission for the stadium and surrounding sites, included detailed landscaping for the podium and the

street level public realm up to the surrounding roads. This has been partially implemented, with hard landscaping including trees, robust bollards seating and patterned paving of tremendously high quality to the High Road frontage to the stadium and Plot 2 (the Tottenham Experience and shop), as well as to the steps up to the podium between the stadium and Plot 2, and between Plot 2 and this application site.

The pavement up to Park Lane, and the surface of the podium itself, is currently a temporary, interim solution, and the podium is only opened up to public access on match and event days. The applicants have explained they cannot complete the podium landscaping and open it up to permanent public access until all the surrounding buildings, providing daily, especially non-match/event-day activation and passive surveillance, have been completed. However, they have agreed that on completion of this hotel, not only will the final public realm landscaping be completed, but the area of the podium between the hotel, Tottenham Experience and stadium will be opened to more routine public access. They have also updated the landscaping to both the street and podium to accommodate changes in this application.

To the street frontage, the key move has been the creation of a covered pedestrian arcade, uniting the hotel residential and podium access. The openness, lightness and airiness of this arcade has been maximised in design evolution of the building base, so that entrances onto it will be highly visible from the street. The concrete clad surfaces within and around it are amongst several spaces identified for art. At its western end, the key corner, the hotel and club entrance still projects forward but now only slightly and enables smoother pedestrian flow. At its eastern end, a security office gives access to hotel staff and deliveries, secure visitor cycle parking and access to the stadium carpark and provides passive surveillance.

In front of the hotel, the vehicular drop-off has been expanded to meet hotel needs, including for sensitive guests such as visiting team or band coaches, whilst not losing its feel as part of the public realm and streetscape. A low planting bed including further public art opportunity, will provide greenery and benches, as well as protecting the pedestrian pavement alongside Park Lane from the vehicular drop-

off. Robust, high-quality paving and bollards consistent with that used along the High Road, incorporating the same striped patterning to give the stadium neighbourhood an appropriate distinct character, will connect the start of Park Lane with the stadium frontage, and should be continued when the final phases come forward.

Similarly, the podium landscape is to be completed around the hotel, in line with the previous agreed design, modified to accommodate these changes. In particular two areas of outdoor seating, facing the stadium for the hotel café, and overlooking the edge of the podium onto Park Lane at the hotel etc. entrances are expanded and detailed, with significant additional planting to the robustly designed but harmonious fencing and to the podium entrance. Fencing to the café seating is identified as a further opportunity for public art, with two other locations identified being the hotel west façade beside the stairs and in the hotel lobby; the applicants have also committed to a procurement process for public art working with the Tottenham creative community, in response to Quality Review (QRP) requests.

Residential Accommodation

These are universally high-quality flats, well over minimum space standards. The mix includes a good number of larger family sized units, all are at least dual aspect, and all contain a large private external balcony or roof terrace. As well as each apartment's private space, residents share communal indoor and outdoor amenity spaces, including an outdoor childrens' play space, separately accessible from the lift core, on the 13th floor terrace where the building steps in from the coped covered hotel element to the glass residential element.

The route of access to the residential component of this development, from the street to the flat door, is one of the most significant improvements of this application. The apartments have their own private communal front door directly off the street, next to but clearly separate from the hotel, in the covered arcade area that has been improved during the course of the application to make sure it is safe, light, welcoming, visible from the street and in no way an unpleasant undercroft. Natural light is also available to the communal circulation on each floor. Fire escape is thoroughly

resolved, with separate dual stairs leading to separate exists for both the hotel and residential, meaning that there are four stairs rising through the hotel floors.

As a tall building with all the permanent residential accommodation above the thirteenth floor, and with no plans or even likelihood of other residential tall buildings being built very close to this site (most significantly with the Stadium to its immediate north, Extreme Sports site to its immediate east and Tottenham Experience to its west), there is no concern for daylight or privacy to these flats or any impact on daylight or privacy from these flats on any existing or approved residential neighbours. The applicants' day and sunlight assessment and environmental statement find that the proposed accommodation would receive excellent day and sunlight levels, above the BRE Guide recommendations.

Their assessment also finds there would be negligible effects on daylight to neighbours, compared to the consented scheme. Just one window & no rooms receive a severe detrimental loss of daylight, with the few windows and even fewer rooms to be assessed as experiencing any notable loss only experiencing a minor loss of daylight. Sunlight impact on neighbours is only relevant for amenity space, as there is no housing to the north, that could be detrimentally affected, & their assessment finds that there would only be a tiny additional overshadowing of any amenity space, that being to a small corner of the open space around a neighbouring school, which has plenty of other open space / playspace that would be unaffected by this amendment.

There are no adopted or recommended standards for hotel, but the standard of accommodation, including daylight, ventilation and noise insulation is expected to be high, and disturbance to neighbours low to non-existent. The hotel and associated but independently accessible club will generate activity, visitors, traffic, employment, spin-off ventures and in general increase the attractiveness of North Tottenham as a visitor destination. But the neighbourhood is designated to become a town centre, has received improvements to its excellent public transport, walking and cycle route connections, and is expected, with this wider development and with the adjacent

	<p>High Road West development, to receive further public realm, social infrastructure, public amenity, and park improvements.</p> <p><u>Conclusion</u></p> <p>These amendments have been convincingly demonstrated by the applicants' to have grown out of their assessment, in consultation with their expert specialist consultants, including hotel specialists, of how to make the hotel and associated high-end residential "offer" in this plot of the wider Spurs Stadium development make a significant contribution to the success of the stadium and wider area, with a greater economic vibrancy on non-match and event days, whilst being ever more complimentary to the growing importance of the stadium as a sports and events venue. As such it supports the council's aspirations for greater economic vibrancy and opportunity in what has long been the most deprived corner of the borough.</p> <p>To these ends, the applicants have therefore sought to significantly improve the quality of its design, alongside enlargement and improvement of the accommodation proposed, albeit that in pure numbers of hotel rooms and homes it remains the same. The strength and qualities of this design are that it achieves these without alienating the proposal from its surroundings, as great care has been made, in consultation with Haringey officers to ensure that its appearance, accessibility, public realm and public art contributions will embed it into the existing vibrant neighbourhood and creative community of Tottenham.</p> <p>Although a tall building, its elegant design, striking proportions, and robust materials will ensure it will be of appropriate appearance to a landmark location, acting as a beacon to this major destination, whilst creating high quality, usable public realm, accessible to all, avoiding detrimental impacts on neighbours.</p>	
<p>LBH Lighting</p>	<p>Everything is ok with the proposed lighting; I assume this will be maintained by the football club. All lighting on the public highway on the stadium side of High road & Park Lane is currently maintained by Spurs.</p>	<p>Noted and conditions reiterated from previous approval</p>

<p>LBH Local Lead Flood Authority/Drainage</p>	<p>Having reviewed the applicant's submitted Flood Risk Assessment Report reference number THFC-BHE-XX-XX-RP-CW-0001, 0053214 dated 27 July 2023 Revision P02 and the Drainage Strategy Document reference number 0053214-BHE-XX-XX-RP-C-03000, 0053214 dated 26 July 2023 Revision P02 as prepared by Buro Happold Consultant, we are content that and have no comments to make on the above documents. If the application site is constructed as per the submitted Flood Risk Assessment and the Drainage Strategy documents, we are satisfied that the impact of surface water drainage have been addressed adequately.</p>	<p>Noted and conditions reiterated from previous approval.</p>
<p>LBH Pollution</p>	<p>Having considered all the applicant requested conditions to be amended, please be advised that we have no objection to the proposed application with regards to land contamination and air quality. However, the applicant is reminded of the need to comply with the previous conditions on both grounds i.e. land contamination and air quality, as outlined in the approved planning permission HGY/2015/3000 where applicable for Plot 3 of the previously approved development.</p>	<p>Noted and conditions reiterated from previous approval.</p>
<p>LBH Transportation</p>	<p>This section 73 application relates to Plot 3 of the original consent, the Hotel component of the overall stadium redevelopment. It is for amendments to the previously consented arrangements covered by applications 2017/1183 and 2015/3000. Subsequent applications to the original consent added a residential component to the plot. Originally proposed and consented as a hotel, subsequent applications reconfigured the arrangement to be mixed use hotel and residential.</p> <p>The applicant's intentions are to enhance the consented proposals to change the building form and layout by increasing the building height and floor space, to reflect changes sought since granting of the original consent.</p> <p>These include the following:</p> <ul style="list-style-type: none"> • Changes to the building form and layout. • Increase to the height of the building from 23 to 29 storeys; and • A total increase in the site wide hotel floorspace to 27,378 sqm. 	<p>Noted and conditions and obligations applied.</p>

The applicant's intentions behind these proposed changes include:

- The need to provide a second stair for fire safety
- Variation in hotel room types in terms of layout and sizing
- Demand for flexible dining arrangements and communal social and workspaces
- Balancing business and leisure need with a focus on ancillary space to support health, wellbeing and guest experience.

From the transportation perspective, there is no increase in either the number of hotel rooms or the number of residential units. The consented development included 180 hotel bedrooms and 49 serviced apartments.

Transportation considerations

A Transportation addendum accompanies this Section 73 application. This provides an update to cover the changes since the earlier consents, and also references the transportation policy changes that have occurred since the original submission, including the Mayor's Transport Strategy, the updated London Plan, the NPPF update and Haringey's Walking and Cycling Action Plan and Transport Strategy.

The relevant transportation topics for discussion are as follows:

Quantum of development

Whilst the numbers of hotel room and residential units are intended to remain as originally consented, it is understood from the application that the configuration of unit sizes in the residential component is changing, with a greater proportion of larger residential units. This does not appear to be included or referenced in the Transport Addendum.

Trip generation

The addendum considers that the trip generation from the hotel and residential apartments will remain as originally considered. Essentially this is agreed however the larger residential units will likely result in a larger trip generation compared to the consented arrangements. This is not however considered to be problematical in trip generation terms but will need to be managed.

Increases in delivery and servicing trips since the 2015 application are referenced due to the changing nature of how developments are serviced in recent years, and the greater proliferation of home working. This development is expected to generate up to three or four delivery and servicing trips in the peak hour for both land uses according to the Transport Addendum.

Pedestrian/cycle access

Three street-level pedestrian entrances are proposed from Park Lane, this will be an improvement in principle from the previously consented arrangements which are for a single building entrance.

The proposed street-level access points include separate entrances to the hotel lobby, to the serviced apartment residential lobby, and a back-of-house entrance.

Cycle parking

Cycle parking provision has been increased, to suit the numerical requirements of the updated 2021 London Plan. The proposed scheme will provide 106 long-stay and eight short-stay cycle parking spaces for all land uses located on the ground floor. A total of 5% of the long stay cycle parking for 6 be suitable for accommodating cargo bikes and adapted cycles, which is in line with the London Plan/LCDS requirements.

Access to the cycle parking area is taken via the back of house access. Short-stay cycle parking for visitor and long-stay cycle parking for hotel employees and guests will be located on the ground floor and will be accessed from this point. A concierge service will be provided for hotel guests. Residential cycle parking is provided at the

basement level, and a cycle lift is proposed to be located adjacent to the visitor's cycle parking area on the ground floor.

Full dimensional and layout details of the proposed access and cycle parking arrangements should be provided to confirm acceptability and demonstrate accordance with the LCDS, this can be covered by a pre commencement condition.

Car parking

It is detailed that access arrangements to the car parking area in the basement of the hotel will remain unchanged via the constructed ramped access provided immediately to the east of the hotel.

The consented scheme included 76 car parking spaces for the hotel at basement level, which have now been constructed. The increased cycle parking provision and other changes with the proposed development will reduce the number of car parking spaces provided in the basement. Seven wheelchair accessible spaces and 57 standard spaces will be retained as previously consented, a total of 64 spaces. This is still considered an over generous provision however the car parking spaces have already been constructed and will have to be managed by a site wide parking management plan to promote travel by sustainable modes of transport as part of the travel plan for the site.

Electric vehicle charging will be provided to 20% of the spaces as active charging facilities and the remaining 80% will have passive provision meaning that all spaces can be upgraded to provide electric vehicle charging if there is demand. This is an improved situation compared to the previously consented arrangements and it will accord with the current London Plan.

Delivery and servicing arrangement

The addendum details that delivery and loading service patterns have changed, particularly with respect to residential development since the preparation of the documents for the original application, as a result of greater homeworking and changing work/life patterns. There is no cross reference to the original or subsequent

application arrangements to detail this difference in the absolute numbers of movements and differing requirements for this plot.

In terms of servicing movements, the addendum details 34 daily trips in total, 16 for the hotel and 18 for the residential, predominantly taking place during the morning 6-hour period from 0600 – 1200, however it is expected the spread will be wider during the working day. A requirement for three bays to meet demands is detailed.

The strategy proposes an off-highway arrangement for receiving delivery and servicing vehicles. two loading bays are proposed for the podium area for hotel refuse and servicing vehicles including 7.5t vans and collection vehicles, and a single loading bay within the 'plaza' area at the front of the development for which a swept path has been provided for a 4.6t van. There is also reference on page 21 to the peak requirements for servicing to be for three loading bays, and three off highway loading bays are proposed.

There is also reference to retaining the earlier proposed on street loading bay within Park Lane, deleting the inset bay, and retaining the two bays off Worcester Avenue. The addendum doesn't clearly explain what the proposed bay arrangements will be and why that arrangement is suitable/required for the numbers of movements and sizes of vehicles visiting. It is confusing that the two future inset bays in Worcester Avenue are referenced as well, as they are it is assumed, intended for the plots to the east side of the overall site.

Included in the addendum are comments on reducing use of the basement car park for delivery and service vehicles, without explaining why the situation is different to originally envisaged.

Off Highway servicing is preferred and sought by the Council because of the need to enhance the public highway along Park Lane, given its connections to the east.

Overall, the applicant needs to clarify what the proposed regime of delivery and servicing bays and arrangements are to clearly detail the requirements and proposed

provision, to avoid on street loading, this must be conditioned in the delivery and servicing plan.

As above a delivery and servicing plan collating all the changed delivery, servicing and refuse/recycling collection and storage information will be required to demonstrate how these are to be undertaken and how the visiting service vehicles will access, egress and be accommodated without impeding the operation of the public highway and to prevent vehicles waiting off site.

Podium servicing considerations

The proposal is now for the hotel refuse and servicing movements to use two bays on the podium area, accessed via Worcester Avenue. Peak demands are described as requiring two bays with a total of 16 service trips a day.

Given the originally envisaged nature of this area, as a 'place' and with an active frontage, this would introduce service movements not originally envisaged and accordingly details of how it is intended to manage visiting delivery and service vehicles will be required.

This can be covered within an updated Delivery and Servicing Plan, and the information to be provided should include step by step details of access to and from the Highway, the oversight of vehicles as they move across the Podium (details of marshalling arrangements and numbers of marshalls), swept paths to show progress between landscaping and any other features, and management arrangements to ensure visiting service vehicles adhere to their booked slots and dwell durations to ensure as smooth working as possible to accommodate movements in this area without comprising the pedestrian environment, restricted time slots should also be implemented to ensure no delivery takes place when the podium is been used for events.

Coaches and drop off/pick up to Plaza.

Coaches and taxi drop off will be accommodated in front of the hotel, separate to the loading facilities for the residential land use to ensure demand is managed appropriately. Fire tenders are also able to access the drop off zone.

The Transport Addendum includes swept path plots for the proposed arrangements at the Park Lane frontage of the site. They don't seem to show the Plaza loading bay detailed for the 15m coach swept path, it appears that a parked/dwelling service vehicle would not enable a coach to pass. The addendum references 18 service visits a day visiting and dwelling on the plaza, an explanation of the frequency of coach arrivals and departures and likely dwell periods is required, along with the proposed arrangements for managing this space and vehicle movements onto and off of it so that no vehicles wait on the highway. This can also be included within a comprehensive Delivery and Servicing Plan.

Highway/public realm environment within Park Lane and S278 works.

Clarity is needed with respect to the eventual highway arrangements associated with this plot in the overall development. As commented earlier the delivery and servicing part of the addendum is requiring clarification as part of this. Loss of previously proposed on street loading bays is welcomed as the Council has aspirations to improve Park Lane to provide a more inclusive and active travel friendly corridor along it given its connection from the stadium site to the east and Northumberland Park Station. This includes provision of formal cycling facilities, additional planting, and footway/public realm improvements.

The applicant's Active Travel Zone assessment reviewed Park Lane as a key east – west route from the site, and this reported that there are opportunities to Improve the surfacing of footpaths and crossings and also that removal of unnecessary street furniture and excess vegetation growth should take place and maintain vegetation to prevent overgrowth.

It is considered that the applicant should financially contribute towards improving Park Lane along these lines particular as it is a key approach route from the east. The applicant needs to provide a detailed design for Park Lane to confirm the proposed arrangements for accommodating deliveries and servicing for this and the

remaining plots facing Park Lane and consider those in the context of improving Park Lane as described to improve the road from the 'Healthy Streets' indicators perspective.

A S278 drawing is required to clarify arrangements in the public Highway for crossovers/accesses, footway and carriageway, and other enhancements along Park Lane, including lighting CCTV and a potential cycle lane connection to serve the site.

Travel Plan

As would have been required with the original consent, a Travel Plan will be required for this aspect of the overall development, to follow normal requirements as per TfL guidance.

A draft travel plan has been submitted with the addendum, this is noted and acceptable in principle, it includes proposed mode shares for baseline and later targets based in amended census mode shares from 2011.

Conclusion

This section 73 application is for Plot 3 of the Tottenham Hotspur stadium development. It has previously been consented with the original and second applications from 2015 and 2017, and this application relates to a number of changes proposed to the form and size of the building, to improve the facility in terms of flexibility and communal space.

The overall number of hotel rooms and residential apartments is remaining as consented; however, the sizes of the residential units are increasing overall compared to the consented scheme.

Transportation Policy changes since the original consent have been reflected on with subsequent increases in cycle parking and all car parking spaces will either be active or passive charging spaces.

Changes are proposed for the delivery and servicing arrangements which will require more clarity to explain the regime of bays and management measures. There is conflicting information, it appears that there is off street provision proposed and that no on street loading facility is required, which would be supported, however, there is also reference to retaining on street loading within Park Lane. Other queries related to deliveries and servicing raised in this response also need to be addressed such as use of the basement, the podium and management of the plaza off Park Lane.

As also commented in the response, the Council seeks improvement of the environment within Park Lane, which relates to aspects of the proposed delivery and servicing arrangements needing clarification. The Active Travel Zone assessment in the addendum details areas of improvement appropriate for the Park Lane corridor to improve the environment for active travel users. Both the appropriate delivery and servicing arrangements (for this plot and the whole frontage of Park Lane to the south side of the site) and a financial contribution to achieving this are considered appropriate.

The Transportation planning and highways authority would not object to this application subject to the following conditions and S.106/S.278 obligations:

Conditions

1. Cycle Parking

The applicant will be required to submit to the Highway Authority plans for short stay and long stay cycle parking which are: accessible; sheltered and secure, the number of cycle parking spaces must comply with the London Plan 2021. The design and layout including security must comply with the London Cycle Design standard.

Reason: To ensure that cycle parking is provided in line with the London Plan 2021 Policy T5 and the London Cycle Design Standard (LCDS).

2. Delivery and Servicing Plan

The applicant shall be required to submit a Delivery and Servicing Plan (DSP) for the local authority's approval. The Delivery and Servicing Plan should include step by

step details of access to and from the Highway, the oversight of vehicles as they move across the Podium (details of marshalling arrangements and numbers of marshals), swept paths to show progress between landscaping and any other features, and management arrangements to ensure visiting service vehicles adhere to their booked slots and dwell durations to ensure as smooth working as possible to accommodate movements in this area without compromising the pedestrian environment and movements the DSP should include a ban on vehicular movement on the podium with the exception of emergency vehicles during the critical pedestrian times, these times must be agreed with the Highways Authority before the development is occupied.

Reason: To ensure that the development proposal can be serviced adequately.

3. Car Parking

The applicant will be required to submit a Car Parking Management Plan to the Highway Authority for approval which details the management of onsite car parking and the allocation of the reduced quantum of allocated car parking spaces to residents/ visitors and increase the use of public transport.

Reason: To increase the use of public transport to residents/ visitors of the development and to reduce travel by vehicular traffic to and from the site.

4. Electric Vehicle Charging

To provide Electric vehicle charging facility in line with the London Plan 20% of the spaces as active charging facilities and the remaining 80% with passive charging.

Reason: To be in accordance with published London Plan 2021 Policy

S.106 Obligations

1. Car-Free Agreement

The owner is required to enter into a Section 106 Agreement to ensure that the residential units are defined as “car free” and therefore no residents therein will be entitled to apply for a residents parking permit under the terms of the relevant Traffic Management Order (TMO) controlling on-street parking in the vicinity of the development. The applicant must contribute a sum of £4000 (four thousand pounds) towards the amendment of the Traffic Management Order for this purpose.

Reason: To be in accordance with the published London Plan Policy T6.1 Residential Parking, and to ensure that the development proposal is car-free, and any residual car parking demand generated by the development will not impact on existing residential amenity

2. Hotel/Residential Travel Plan

Within six (6) months of first occupation of the proposed new residential development a Travel Plan for the approved residential uses shall have been submitted to and approved by the Local Planning Authority detailing means of conveying information for new occupiers and techniques for advising residents of sustainable travel options. The Travel Plan shall then be implemented in accordance with a timetable of implementation, monitoring, and review to be agreed in writing by the Local Planning Authority, we will require the following measures to be included as part of the travel plan in order to maximise the use of public transport:

- a) The developer must appoint a travel plan co-ordinator, working in collaboration with the Estate Management Team, to monitor the travel plan initiatives annually for a minimum period of 5 years.
- b) The applicants are required to pay a sum of, £3,000 (three thousand pounds) for five years £15,000 (fifteen thousand pounds) in total for the monitoring of the travel plan initiatives.

Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

3. Car Club Membership

The applicant will be required to enter into a Section 106 Agreement to establish a car club scheme, which includes the provision of three years' free membership for all residents and £300 (three hundred pounds in credit) per year/per unit for the first 2 years.

Reason: To enable residential occupiers to consider sustainable transport options, as part of the measures to limit any net increase in travel movements.

4. Highway Improvements

The developer will be required to provide a detailed design for Park Lane which includes the proposed arrangements for accommodating deliveries and servicing for this and the remaining plots facing Park Lane, and consider those in the context of improving Park Lane as described to improve the road from the 'Healthy Streets' indicators perspective, including lighting CCTV and cycle lanes connection to serve the site.

The owner shall be required to enter into agreement with the Highway Authority under Section 278

of the Highways Act to pay for any necessary highway works, which includes if required, but not limited to, footway improvement works, access to the Highway, measures for street furniture relocation, carriageway markings, and access and visibility safety requirements. Unavoidable works required to be undertaken by Statutory Services will not be included in the Highway Works Estimate or Payment. In addition, the cost estimate is based on current highways rates of the permanent highways scheme. The developer will be required to provide details of any temporary highways scheme required to enable the occupation of each phase of the development, which will have to be costed and implemented independently of the cost estimate for the permanent works.

Reason: To implement the proposed highways works to facilitate future access to the development site.

5. Construction Logistics and Management Plan

	<p>The applicant / developer is required to submit a Construction Logistics and Management Plan, 6 months (six months) prior to the commencement of development and approved in writing by the local planning authority. The applicant will be required to contribute, by way of a Section 106 agreement, a sum of £15,000 (fifteen thousand pounds) to cover administration and oversee the temporary arrangements and ensure highways impacts are managed to minimise nuisance for other highways users, local residents and businesses. The plan shall include the following matters, but not limited to, and the development shall be undertaken in accordance with the details as approved:</p> <ul style="list-style-type: none"> a) Routing of excavation and construction vehicles, including a response to existing or known projected major building works at other sites in the vicinity and local works on the highway. b) The estimated number and type of vehicles per day/week. c) Estimates for the number and type of parking suspensions that will be required; and d) Details of measures to protect pedestrians and other highway users from construction activities on the highway. e) The plan must include existing and post construction surveys of Park Lane. <p>Reason: To provide the framework for understanding and managing construction vehicle activity into and out of a proposed development in combination with other sites in the Tottenham area and to encourage modal shift and reducing overall vehicle numbers. To give the Council an overview of the expected logistics activity during the construction programme. To protect the amenity of neighbouring properties and to maintain traffic safety.</p>	
LBH Waste Management	As we discussed the hotel waste is classed as commercial and so their waste and recycling can be collected by any registered waste collector not just Haringey's	The applicant responded to answer some questions, all of which

contractor, and charges will be based on type of waste, quantity and frequency. However, in our SPD we state that

'the maximum design capacity for commercial waste storage should not rely on high frequency collections. To do so would promote higher levels of vehicle movements adding traffic congestion and pollution as well as risk overflows if the collection service is hampered in any way - by driver or fuel shortages, for example'

On this basis we would advise having some fall back/provision to store waste for a period of at least 4 days should there be any issues that affect collections. I noted in the DAS 2-3 days has been suggested whereas 3-4 would be better.

With the residential waste, Haringey has a legal obligation to collect this and our updated guidance on waste and recycling storage provision for communal households (not sure if the revised version of the SPD has been published yet) is outlined in the table below. Collections are on a weekly basis which has been used in the calculations for this development.

Refuse allocation	Capacity	Approximate bin dimensions
per 6 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H

Dry mixed recycling allocation

per 10 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H
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Food waste allocation

per dwelling	20 litres	140 litre wheeled bins
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Any proposal to incorporate rubbish chutes must include an 'Innovation and residential waste management plan'

The waste and recycling management strategy in the DAS covers all the key points we would expect to see but I did notice some discrepancies in Section 8 part 7, para 8.9.2 which are that:

were satisfactorily answered. The only concern was that Veolia wouldn't always be able to specify that collections would be at specific times. However, the applicant has clarified that there will be private collections for residential and commercial.

- Mixed recycling also includes paper, card, glass and cartons not just metals and plastics.

- Bulky waste collections in Haringey are between £20 - £80 for up to 10 items max - Bulky item collections | London Borough of Haringey

- Food waste can only be collected from 140 litre bins and not 360 litre bins (this has been updated in the latest SPD guidance)

I have also attached Veolia's RCV spec to help with the vehicle sweep path analysis calculations and other access considerations, as I wasn't sure if these had been provided before.

If there is more information available about the numbers of residential bins and the split between refuse and recycling it would be good to see those and the pull distances of the containers to the vehicles. I didn't see them in any of the documents I looked at, unless they are included in the Hotel details of the Buro Happold report.

As far as the collections are concerned, operationally we would look to reduce the need to reverse RCVs and avoid having allocated time slots due to the factors that can affect RCVs on their rounds.

If there is anything else I may have missed or that you specifically want me to comment on, please let me know.

Supplementary discussion following responses from the applicant:

I've looked at the information provided below and liaised with Veolia. What has been proposed seems acceptable except that Veolia have stated that sometimes the waste and recycling for high rise blocks is scheduled for collection on the same day. With this in mind the assumption below may need revisiting with regards to storage space prior to servicing as all bins will potentially need to be available on the collection day:

	<i>'the different waste streams (general waste, recyclables and organics etc.) will be collected at different times. As such, this presentation area has been sized to accommodate the highest number of bins that will be requiring collection at any one given time – that is, the general waste bins (a total of 8 x 1,100L bins). '</i>	
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EXTERNAL		
Active England	In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes	Noted. TfL have commented and requested an Active Travel Zone (ATZ) assessment and Highway Safety Audit
Barnet Council	No objection	
Environment Agency	The Environmental Permitting (England and Wales) Regulations 2016 require a Flood Risk Activity Permit to be obtained for any activities which will take place: <ul style="list-style-type: none"> • on or within 8 metres of a main river (16 metres if tidal) • on or within 8 metres of a flood defence structure or culvert including any buried elements (16 metres if tidal) • on or within 16 metres of a sea defence • involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • in a floodplain more than 8 metres from the river bank, culvert or flood defence 	

structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing enquiries@environment-agency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

Advice to LPA and applicant Flood resistance and resilience We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage. To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in: Government guidance on flood resilient construction <https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings> CIRIA Code of Practice for property flood resilience https://www.ciria.org/Research/Projects_underway2/Code_of_Practice_and_guidance_for_property_flood_resilience_.aspx British Standard 85500 – Flood resistant and resilient construction <https://shop.bsigroup.com/ProductDetail/pid000000000030299686>

Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit <https://www.gov.uk/sign-up-for-flood-warnings>. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety. Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit <https://www.gov.uk/prepare-for-flooding>. To get help during a flood, visit <https://www.gov.uk/help-during-flood>. For advice on what do after a flood, visit

	<p>https://www.gov.uk/after-flood. Pre Application Advice Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNLsustainableplaces@environment-agency.gov.uk.</p> <p>Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agencystandard-terms-and-conditions. Final comments Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.</p> <p>Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.</p>	
Hackney Council	No objection.	Noted.
Historic England	<p>Summary</p> <p>Historic England maintained a strong objection to the consented 2015 scheme for the redevelopment of the stadium site to which amendments are now proposed. Aspects of the scheme, including the radically altered setting of a Grade II listed building and demolition of several locally listed buildings within the conservation area, have now been implemented despite our view that this would cause substantial harm. The proposal seeks to increase the height of the hotel tower by 6 storeys (27m) from 23 to 29 storeys (127.2m AOD). Whilst there is an existing planning consent and we acknowledge the recent appeal decision on a neighbouring site for towers of 32, 29 and 27 storeys, we remain of the view that harm arises from the scale of the new development which fails to respond appropriately to the existing grain and character of the local conservation areas. In determining this application for a minor material amendment to the approved scheme, we remind you of your duties under the 1990 Act to give 'special regard' to the setting of listed buildings and conservation areas and that 'great weight' be given to the</p>	Objection noted and addressed in the comments from LBH Conservation officer comments and in the report.

	<p>conservation of heritage assets in accordance with the NPPF. You must also be satisfied that the public benefits, including heritage benefits, are real and cannot be delivered by any other means.</p> <p>Historic England Advice Our statutory remit is the impact of the proposals on the historic environment. Our advice below is based on an understanding of the historic environment affected by the proposals, and an assessment within the context of national planning policy as to whether the proposals harm, retain or enhance this significance. Planning history of the site</p> <p>In 2010, Historic England accepted the justification put forward for the redevelopment of the existing stadium and the consequent harm to the historic environment of North Tottenham as we acknowledged the benefits arising from retaining the football club in its historic location. We judged that this benefit, alongside others, could outweigh the harm and therefore supported the proposals which delivered this aim. This scheme was consented by LB Haringey.</p> <p>In 2015, we considered further proposals for the redevelopment of the existing stadium and provided detailed comments both at pre-application and application stage following the presentation of the scheme by the applicants to our London Advisory Committee in June of that year.</p> <p>We raised a number of concerns including:</p> <ul style="list-style-type: none">• the demolition of three locally listed buildings that made a positive contribution to the special character and appearance of the North Tottenham Conservation Area• development immediately adjacent and to the sides and rear of Grade II listed Warmington House would harm its setting and the contribution this makes to the significance of the building as a formerly detached villa• impacts on the settings of the North Tottenham Conservation Area and the Bruce Castle Conservation Area, where the proposed hotel (23 storeys) and residential buildings (between 16 and 32 storeys) would dominate a skyline in areas characterised by a traditional building scale. We maintained that the alteration to the setting of the Grade II listed building and the demolition of locally listed buildings would result in substantial harm both to the listed building and the conservation areas. We also considered that the scale of the new hotel	
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and residential towers would cause harm as they failed to respond appropriately to the existing grain and character of the local conservation areas.

Historic England was unconvinced that the proposed scheme would deliver additional public benefits over and above those of the 2010 consented scheme or that the substantial harm to the historic environment caused by the proposals was clearly justified as required in the NPPF. Historic England has accordingly raised strong objections to the proposals and urged your council to refuse them. However, permission was granted by LB Haringey on 15th April 2016.

This consent has been partially implemented and the new stadium constructed. The unlisted buildings have been lost and the setting of the Grade II building significantly altered. In November 2022, planning consent for residential towers of 32, 29 and 27 storeys was granted on appeal on a neighbouring allocated site to the north-west of the football stadium. Known as the Goods Yard and Depot, this site also belongs to the football club. I note that the original decision to refuse the scheme was against the advice of officers. Significance of the historic environment Our previous letters of 3 July and 20 November 2015 detail the significance of the area.

In summary, North Tottenham's character is derived from the ancient linear form of Tottenham High Road and the historic buildings that line it. Most of the High Road is lined with commercial premises and is therefore, characterised by intensively developed, high density urban environments but there are examples of larger institutional buildings. There are good surviving examples of buildings dating from the 18th and 19th centuries including Georgian houses and Victorian shopping parades. Roads flanking the High Road are mostly residential characterised by a more finely grained, domestic scale and greater uniformity. Bruce Grove is essentially a late-Victorian townscape prompted by the arrival of the railway in 1872. There is an emphasis on commercial uses, such as shopping parades, and it is low in height and scale with many of its buildings relatively uniform at three-storeys.

Proposed amendments and their impact:

The current scheme seeks an increase in height of the hotel building (plot 3) on the stadium site from 23 to 29 storeys, an increase of 27m to 127.2 AOD. The new tower will

provide 27,378 sqm floorspace for hotel and residential use, an increase from the approved 19,835 sqm.

The design of the tower has also been modified with changes to the building form and layout. The hotel building will stand to the south of the stadium and is positioned within the conservation area as per the original 2015 application.

The building will be greatly out of scale with the much lower heights of historic buildings within the North Tottenham and Bruce Grove Conservation Areas and which contribute positively to the significance of the conservation area. This extreme contrast in height would be very noticeable in views within and beyond the conservation area boundaries, resulting in the new tower visually dominating the traditional built form that contributes to the character of the conservation area.

Relevant National and Regional Planning Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2021 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.195). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.199). Clear and convincing justification should be provided for any harm caused (para.200), and any harm should be weighed against the public benefits of the scheme (para.202).

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place

created by London's historic environment, and the irreplaceable nature of its heritage assets.

The Tottenham Area Action Plan (TAAP) establishes the local spatial planning framework for the area and details the growth objectives for the area. The site is within the Tottenham Hotspur Stadium site allocation (NT7) for which the TAPP provides the indicative development capacity for 285 net new homes and 18,830sqm of hotel floorspace. Policies DM12 and DM13 of the Local Plan seek to protect the historic environment including the setting of designated heritage assets.

Historic England's position:

Historic England remains deeply concerned about the harm to the historic environment resulting from the impacts of the redevelopment of Tottenham Football Stadium. We acknowledge that the consented scheme has been partially implemented and that this is a material consideration. We also note the recent planning appeal decision on the Goods Yard and the Depot site. However, we remain of the view that the hotel tower will cause harm, which we identified in our response to the original consultation. It will dominate a skyline currently characterised by a traditional building scale and cause visual harm in some views from within the North Tottenham Conservation Area and the Bruce Castle Conservation Area. The proposed additional height will exacerbate this harm.

We, therefore, remind you of your statutory duties under the 1990 Act and in applying the NPPF policies as set out above. We draw your attention to the need to have 'special regard' for the historic environment in determining this application and of the impact of the additional height, scale and mass of the proposals. We also draw your attention to additional public benefits that are derived from this scheme should be assessed to ensure that they are real and cannot be delivered by other means. This response relates to designated heritage assets only.

If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

<p>Health and Safety Executive (HSE)</p>	<p><u>Scope of consultation</u></p> <p>1.1. It is noted the above application relates to Minor Material Amendments to height, design, maximum floorspace and associated works to Plot 3 (Hotel / Residential development) of the hybrid planning permission HGY/2015/3000.</p> <p>1.2. This Section 73 Application will seek to vary Conditions A4 and A7 of the NDP Hybrid Consent, approved on 15 April 2016 (LPA ref. HGY/2015/3000). It relates solely to Plot 3 (Hotel) and proposes the following amendments to the approved scheme for Plot 3:</p> <ul style="list-style-type: none"> • Changes to the building form and layout; • Increase to the height of the building from 23 to 31 storeys; and, • An increase in the site wide hotel floorspace to 16,601 sq.m. <p>1.3. The 'Gateway 1 Fire Form Update' (dated 25/10/2023) states the following:</p> <ul style="list-style-type: none"> • NDP Hotel is a 31 storey (plus basement), mixed-use building with a height of 107.9m. • Ground to Level 13 - hotel inc ancillary and amenity areas. • Level 14 - residential ancillary and amenity areas • Levels 15-29 - of residential accommodation. • Levels 29-32 - residential duplexes • Levels 31-32 – roof top plant <p>1.4. Section 4 of the fire statement states: "The outcomes of any future consultation with the Health and Safety Executive (HSE) and the London Fire Brigade (LFB) will also be used to inform the design. However, in any case the building has been afforded two vertical escape routes for each storey/demise, notably for the residential portions, to adopt a two-stair strategy having no reliance on adjacent demises for means of escape or firefighting access."</p>	<p>Noted further details and compliance will be required. A fire statement and gateway 1 condition is recommended.</p>
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1.5. The updated fire statement (25/10/2023) states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. However, Section 3.2 of the (London Plan) fire statement states: “Fire engineering principles may be employed to support alternative solutions where strict adherence to the codes would conflict with the wider aspirations for the scheme. Departures from guidance of BS 9991:2015 are identified and alternative proposals are documented.” It is noted the fire statement(s) were helpfully detailed and informative.

Consultation

1.6. Section 7 v) of the fire statement states: “Following the recent... the residential accommodation is afforded two vertical escape routes for each storey. Therefore, the residential section of the building is served by two stair cores. These stair cores are both to function as a firefighting stair for the building... This additional stair serves into one of the common corridors of the residential levels, with the primary firefighting stair opening directly into the lift lobby served by the two firefighting lifts.”

1.7. Section 2 of the fire statement update document states: “There are four primary stairs serving across the building, with two stairs serving the hotel portion of the building, and two separate stairs serving the residential portion of the building. Three of these stairs will serve down to the shared landlord plant and ancillary spaces at basement level, which includes a car park, and one additional escape stair will be provided which solely serves this basement plant and ancillary level accessed from L01 off the podium.”

1.8. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

	<p>The following information does not contribute to HSE’s substantive response and should not be used for the purposes of decision making by the local planning authority. Means of escape</p> <p>2.1. Section 7 i) of the statement states: “The building contains both residential and commercial use areas. However, means of escape between the commercial occupancies and residential occupancies shall be separate.”</p> <p>2.2. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages. Additionally, HSE notes and welcomes the applicant’s commitment (paragraph 1.4) for any future consultation with HSE and LFB to inform the design. The following supplementary comments should be considered in that context.</p> <p>2.3. Section 7 ix) of the fire statement states: “The proposed building is over 18 m in height to the topmost accessible storey, and the building has a floor area over 900m2. However, in the hotel demise of the building, only of the stair cores have been designed as a fire-fighting shaft. On the hotel levels, and in consideration of the floor areas, which marginally exceed the 900m2 area limitation as stated by guidance for a single firefighting shaft. However, only one firefighting shaft has been proposed within the hotel levels given that the 900m2 area limit is only exceeded when measuring GIA, in which the NIA excluding the cores falls below this limit. Further, the hose laying for all hotel levels is within the 60m limit from the single firefighting shaft provided. However, this approach is subject to discussion and formal approval with the approval authorities.”</p> <p>2.4. As acknowledged by the applicant, the cited fire safety standards state at least two fire-fighting shafts should be provided in buildings with a storey of 900 m2 or more in area. Accordingly, HSE agree that the hotel should be provided with an additional firefighting shaft. It is noted that the elements of a firefighting shaft appear to be provided (see paragraph below) on all hotel storey levels and HSE cannot see any impediment to the creation of a second firefighting shaft.</p> <p>2.5. In reference to paragraph 2.4., section 8.3.1 of the (London Plan) fire statement states: “In addition to the above, the second stair core serving the hotel levels, although</p>	
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not designed as a firefighting shaft, will be a protected stair core which is to have a wet riser provided and smoke ventilated lobby at all levels, to support firefighting operations.”

2.6. In this instance, given the provision of the second staircase and its proximity to the nearest lift(s), design changes necessary to provide an additional firefighting shaft including a firefighting lift, are unlikely to affect land use planning considerations. However, it will be for the applicant to demonstrate compliance at later regulatory stages.
QDR

2.7. The fire statement (section 7 ii) states: “The development contains a building over 50 m in height, making it a non-conventional by virtue of height. As such, a qualitative design review (QDR) process will be undertaken with all stakeholders, inclusive of the Approval Authorities, across the design stages.”

2.8. This is noted. It will be for the applicant to demonstrate compliance at later regulatory stages.

Smoke ventilation / CFD

2.9. Section 7 v) of the fire statement states: “For the residential accommodation, within common corridors / evacuation lift lobbies, mechanical ventilation will be provided to support the two stair arrangements provided in each building. These provisions will be supported with computational fluid dynamics (CFD) to show that evacuation lift lobbies are tenable, and the staircases remain suitable for evacuation and firefighting purposes.”

2.10. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Open plan layout

2.11. Section 7 vi) of the fire statement states: “Within the residential flats, the kitchens are proposed to be unenclosed (open plan layout), as such a radiative fractional effective dose analysis shall be carried out to escape the suitability of escape past hobs.”

2.12. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

	<p><u>Sprinkler system</u></p> <p>2.13. Section 7 viii) states: “A commercial sprinkler system meeting the requirements for an HHP3 hazard group is to be installed in line with BS EN 12845 to protect the basement plant and ancillary areas of the building. This increased category specification is due to consideration of the car park within the basement of the building, and as advised when following LPC rules.”</p> <p>2.14. This is noted and HSE welcome the increased category specification. However, it will be for the applicant to demonstrate compliance at later regulatory stages. Hose laying distances / basement</p> <p>2.15. The Design and Access Statement (8.3.2) states: “The only exception the above is the basement level, where there is an extended distance to reach the plant at the north portion of the basement. To support this an additional dry riser was introduced to the northernmost stair serving this space. However, there are still areas that fall behind this 45m limit, this approach will be subject to discussion and formal agreement with the approval authorities. It is noted that these spaces served by the extended distances, are only associate with low-risk water plant for the building”</p> <p>2.16. This is noted, however, as stated by the applicant this extended distance falls outside the cited fire safety standard. It will be for the applicant to demonstrate compliance at later regulatory stages.</p>	
Islington Council	No objection	Noted.
Metropolitan Police	Thank you for consulting with our office on the proposed material amendments to this hybrid development. Our office would like it noted that residential cores, commercial and communal spaces designed to facilitate a high footfall within public through routes, open spaces, public seating areas that fall within catchments of organised events and transport links are often manipulated by Anti-social behaviour (ASB) and offer opportunities for those wishing to commit criminal activities. Physical security elements and active management within mixed developments are proven to reduce unwanted criminal	

activities and reduce the fear of crime within such spaces, promoting sustainable diverse and integrated communities. The Secured by Design (SBD) police endorsed scheme works to reduce the likelihood of ASB / criminal behaviour, promoting safe and inclusive environments for residents and visitors to the area. Creating a sense of place where local residents and legitimate users are able to go about their daily routine without unduly fearing crime or insecurity, is a key element of the Secured by Design initiative, as is long term sustainability. We can confirm that initial crime prevention discussion with the applicants appointed consultants have recently taken place. They have been able to demonstrate how in principle the Applicant could implement proportionate and appropriate physical security measures in conjunction with a flexible risk based security support and management strategy which would in theory enable the development to meet local crime prevention recommendation and achieve a Secure by Design (SBD) accreditation. If appropriate physical security and crime prevention support measures are correctly incorporated within this development we would have no objections to the proposed changes. We ask that our offices previous 2015 request of a SBD Condition, which would also where appropriate include Counter Terrorism preventative measures for the site, is renewed to cover any changes to the mixed proposal of Hotel and Residential development within plot 3, as part of any planning approval.

Condition Request:

Please find below, for your consideration, our suggestion on an appropriate SBD Condition;

- Community Safety – Secured by Design Condition: (a) Prior to the commencement of the development hereby permitted, details of the measures to be incorporated into the development demonstrating how the principles and practices of the current ‘Secured by Design’ schemes have been included within the design and build shall be submitted to and approved in writing by the Local Planning Authority. Once approved in writing by the Local Planning Authority in consultation with the Metropolitan Police Designing Out Crime Officers, the development shall be carried out in accordance with the agreed details and maintained to the ‘Secure by Design’ standards thereafter. (b) Prior to the first occupation, or use of an individual building, Residential and/or Commercial within the development, a letter from Metropolitan Police Designing Out Crime Office stating that

	<p>appropriate SBD measures of compliance for the occupied or used section have been met, will be required. (c) On full completion of the development hereby permitted, including landscaping, external materials and other works incidental to the proposed development the full SBD certificate will be required.</p> <p>Reason: In the interest of creating safer and sustainable communities.</p> <p>Informative: The applicant must seek the advice of the Metropolitan Police Service Designing Out Crime Officers (DOCOs) through each stage of the design and build in order to provide the relevant support submissions and achieve a SBD accreditation. The services of MPS DOCOs are available free of charge and can be contacted via docomailbox.ne@met.police.uk.</p>	
National Gas Assets Team	<p>Regarding planning application HGY/2023/2137, there are no National Gas Transmission assets affected in this area.</p> <p>If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.</p>	Noted.
National Grid Electricity Transmission Asset Protection Team	<p>Regarding planning application HGY/2023/2137, there are no National Grid Electricity Transmission assets affected in this area.</p> <p>If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.</p> <p>Please note this response is only in reference to National Grid Electricity Transmission assets only. National Grid Electricity Distribution (formerly WPD) and National Gas Transmission (formerly National Grid Gas) should be consulted separately where required.</p>	Noted
Natural England	<p>Natural England has previously commented on this proposal and made comments to the authority in our response dated 15 October 2015, reference number 166359. The advice</p>	Noted.

	<p>provided in our previous response applies equally to this amendment. The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal. Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.</p>	
Transport for London	Comments included in GLA response.	