

Planning Sub Committee

REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE

1. APPLICATION DETAILS

Reference Nos: HGY/2024/1008

Ward: Northumberland Park

Address: Tottenham Hotspur Stadium, 748 High Road, Tottenham, London N17 0AL

Proposal: Minor Material Amendment application under Section 73 of the Town and Country Planning Act for the variation to Condition B9 (Major Non-association Football Events) (MNFEs) of the hybrid planning permission HGY/2023/2137 (as amended from HGY/2015/3000) for amendments to allow up to 30 major non-association football events including music concerts; and other associated changes

Applicant: THFC

Ownership: Private

Date received: 19/04/2024

Plans and Document: Quod Planning Statement, April 2024; Q230098.EIA Compliance Note.1.1.MT, dated 09 April 2024; Q240048 – Letter, dated 08 July 2024

Full list of plans for the Hybrid permission in appendices

- 1.1 The applications have been referred to the Planning Sub-Committee for decision as the planning application is a major application that is also subject to a s106 agreement.

SUMMARY OF KEY REASONS FOR RECOMMENDATION

- The original hybrid planning permission – reference HGY/2015/3000 granted consent for **Major Non-association Football Events (MNFEs)** which capped these events at 16, of which only 6 can be music concerts. A Section 73 – Non Material Amendment planning application – reference HGY/2023/2137, for various revisions to the original hybrid permission has since been granted which includes the same MNFE condition (condition B9) which retains the capping of MNFEs at 16, of which only 6 can be music concerts.
- This planning application now proposes amendments seek to **increase the total number of MNFEs from 16 to 30 and for the cap on music events to be removed entirely**. Additional caps would be introduced to the total number of boxing events (2), consecutive events in a row (4) and number of events in

- a week (5), with a further cap on the frequency of 5 events in a week would also be capped at 2 for the year.
- Events are currently controlled under the S106 and licensing obligations, including the Local Area Management Plan (LAMP), bespoke travel plans for individual events and Safety Advisory Group (SAG), which ensure that events are continuously monitored and refined as required, with input from relevant stakeholders.
 - The original Hybrid permission - reference HGY/2015/3000, in 2016, required a Business Community Liaison Group (BCLG) to be established, this provides a forum where issues can be raised and addressed in operational management. The LAMP is currently under review and key changes were outlined in a recent meeting of BCLG on 17 June 2024.
 - The increase of events is anticipated to have significant socio-economic benefits, including a total GVA contribution of £344m in the tri-borough area in 2021/22, consisting of both onsite and offsite activity which, after careful consideration and rigorous consultation with key stakeholders is considered to outweigh the potential harm caused through disruption to the local community.
 - Transportation and noise and disturbance from events are considered to be satisfactorily addressed in the existing obligations and conditional requirements. These are considered to be refined through the updates in these working documents and to be improved from the extant permission.
 - Officers consider that the significant increase in MNFEs proposed remains relatively untested at this scale and frequency. As such the permission is recommended alongside a review mechanism, which will be incorporated to ensure that the impacts are recorded and monitored. The review mechanism will be after 1 year presuming that at least 20 MNFEs have been hosted. If the impact is considered to be significant then LBH could require further mitigation or require the number or concentration of events to be reviewed down from 30 after one year.
 - The S106 obligations around the operation of events, as with all other obligations, will be retained and refined as part of this permission.

2 RECOMMENDATION: That the Committee authorise the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to GRANT planning permission subject to the conditions and informatives set out below and the completion of an agreement satisfactory to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability securing the obligations set out in the Heads of Terms below following referral to the Mayor of London.

2.1 That the section 106 legal agreement referred to in resolution (2.1) above is to be completed no later than 09 August 2024 or within such extended time as the Head of Development Management or the Assistant Director Planning, Building Standards & Sustainability shall in her/his sole discretion allow.

- 2.2 That, following completion of the agreement(s) referred to in resolution (2.1) within the time period provided for in resolution (2.3) above, planning permission is granted in accordance with the Planning Application subject to the attachment of the conditions.
- 2.3 That delegated authority be granted to the Head of Development Management or the Assistant Director of Planning, Building Standards & Sustainability to make any alterations, additions or deletions to the recommended heads of terms and/or recommended conditions as set out in this report and to further delegate this power provided this authority shall be exercised in consultation with the Chair (or in their absence the Vice Chair) of the Sub-Committee.

Appendix 1 - Conditions Summary for the entire 'masterplan' site – (Relevant conditions amended):

- A1) Implementation Timescales – Full
- A4) Consented drawings and documents
- A5) Business and Community Liaison Group
- A6) Conformity with Environmental Statement

Appendix 2 - Conditions Summary for the Plot 1 - The Stadium (Relevant conditions B9 and B10 amended only):

- B1) Consented drawings
- B2) Temporary Site Hoarding
- B3) Waste and refuse
- B4) Fixed Illuminated Signage
- B5) Architectural Lighting
- B6) LED Screens
- B7) Event Day Lighting
- B8) CCTV
- B9) Major Non-association Football Events**
- B10) Noise Control Plan**
- B11) Diesel Generators
- B12) Diesel Fuel
- B13) Flues
- B14) Team Coaches
- B15) High Road Vehicular Access
- B16) Mobile Telecommunications Equipment
- B17) Contamination
- B18) Replacement Bird Nests
- B19) Car Parking Management Plan
- B20) Swept Path Analysis
- B21) Cooling Demand

2.4 Section 106 Heads of Terms:

1. Review mechanism:

- i. Permission for 30 events in perpetuity, subject to a single MNFE review taking place at the end of October 2025
- ii. Review period is 2 months from submission of Review Operational Report by the Club
- iii. Review process triggered by hosting of minimum of 20 MNFEs during 2025 (expressed indicatively or as a range 20-23)
- iv. Review of impacts (both positive and negative) on local residents and businesses taking into account the following factors (quantified wherever possible to reduce subjectivity):
 - (a) ASB/street urination/MNFE toilet provisions
 - (b) MNFE noise impacts (as currently measured)
 - (c) Littering/street cleanliness
 - (d) Car parking/enforcement (linked also to TP/mode share targets but also LBH Code of Enforcement)
 - (e) Road closures/traffic management issues
 - (f) Station queue management
 - (g) General compliance with LAMP
- v. Outcome of the review process to either:
 - (a) Confirm compliance
 - (b) Review non-compliance:
 - i. Consider whether any issues can first be addressed by better management (of 4a-g above), then by reviewing frequency of MNFEs and only then reducing the number of MNFEs
 - ii. Guaranteed minimum of 20 MNFEs & no cap on concerts
- vi. In the event of review of non-compliance (against 4 a-g above) or too few MNFEs during 2025 to allow proper measurement, the process repeats in 2026.
- vii. Dispute resolution as per current S106
- viii. Cap on consecutive events - No more than 9 in any 2 week or 14 day period (subject to the review) which is the combined effect of the currently proposed restrictions.

2 Regulatory Services -requested resourcing to mitigate staff for street trading, street drinking etc:

- a) Fee of £1k per event to mitigate street trading and street drinking and other ASB.

3 Noise Monitoring – £1,000 per concert (only) to monitor (where required) in accordance with the Noise management Strategy.

4 MNFE Travel Plan

- a) Bespoke Major Non-football Event Day Travel
- b) To achieve the agreed modal split targets for non-football events (maximum car mode share of 10%).
- c) £30k annual monitoring contribution for 5 years

5 Stadium Cycle Strategy

- a) Specific for MNFEs
- b) Achieve the 1% mode share

6 Stadium Development Coach Strategy

- a) To reduce car travel [The Coach Strategy is implemented via the LAMP.]

7 Red Route

- a) For the Club and the Council to use reasonable endeavours to agree a co-ordinated traffic management and parking enforcement plan within three months of the date of this permission, which is informed by the Council's revised Code of Parking Enforcement; the most recently approved Local Area Management Plan; and the most recent independent monitoring report. The plan should specify any financial contributions from the Club.

8 24-hour ticket window:

- a) For all MNFEs (other than pre-existing agreement for the 2 NFL matches already contracted).
- b) Uncapped for residents in postcodes N15, N17, N18
- c) Criteria for residents to ensure that this is not abused (assume similar to THFC matches)
- d) Notification to residents and ensure the links work

9 Free tickets:

- a) Minimum 100 tickets
- b) For all MNFEs (other than pre-existing agreement for the 2 NFL matches).
- c) Follow postcodes from THFC ticketing (N15, N17, N18)

10 Community fund:

- a) 5k for every MNFE over the existing 16 permitted events
- b) Funds to be allocated by community fund group (THFC, LBH, Cllrs, Business and community representation)

11 Business Charter:

- a) Within 6 months of the date of this permission the Applicant will finalise the terms within the Business Charter with LBH in conjunction with local traders

12 Enfield TMO:

- a) £2,500 to change and re-advertise the TMO

13 Parking Enforcement:

- a) LBH to refresh Code of Parking Enforcement and commit to minimum service standards

14 Amendments to existing S106:

- a) Amended Schedule 2 paras to include wording to “or such other updated or amended document, subject to LBH agreement”
 - para 1 (Major Event Day Stadium Development Travel Plan),
 - para 3 (Stadium Cycle Strategy),
 - para 5 (Stadium Coach Strategy) and
 - para 6 (Major Event Day LAMP)
- b) Annex 1 – updated walking routes

- 2.5 In the event that members choose to make a resolution contrary to officers' recommendation, members will need to state their reasons.

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- Appendix 2: Planning Conditions for Stadium – Plot 1
- Appendix 3: Internal and External Consultee representations
- Appendix 4: Letter from THFC including their appendices 1-9
- Appendix 5: Communication between Club and public

3. PROPOSED DEVELOPMENT AND LOCATION DETAILS

Background

3.1. The extant hybrid planning permission – reference HGY/2023/2137, follows amendments to the previous planning approval - reference HGY/2015/3000, which granted full detailed planning permission for the demolition of the existing Tottenham Hotspur Football Club (THFC) football 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 Warrington 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 apartments.

3.2. 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.
- 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.

3.3. Recent amendments to the original hybrid permission – reference HGY/2015/3000 were approved through a Section 73 minor material amendment application reference HGY/2023/2137 to the development of the hotel in Plot 3. It should be noted that Condition B16 (MNFES) of the original hybrid consent –

reference HGY/2015/3000 is now condition B9 (MNFEs) of the revised Section 73 planning consent decision notice - reference 2023/2137. However, the wording of condition B9 remains the same as the wording of condition B16 of the original hybrid consent, namely capping MNFEs to 16 of which no more than 6 shall be music events. Noise Control Plan condition B17 of the original hybrid consent reference HGY/2015/3000 is also now referred to as condition B10 in the revised section 73 permission reference HGY/2023/2137, but again retains the exact same wording as the original condition.

- 3.4. Previous Non-Material Amendments (NMA) allowed incremental increases in the stadium capacity to 62,850, most recently under planning permission reference HGY/2020/2108.
- 3.5. Two recent NMAs HGY/2023/0823 and HGY/2023/2041 permitted temporary relaxation of the annual limit of 6 music concerts within the 16 Major Non-association Football Events (MNFEs) for 2023 and 2024 calendar years.
- 3.6. The existing extant permission allows for unlimited major association football events and a limit of 16 Major Non-association Football Major Events (MNFEs), of which no more than 6 can be concerts for all other years.
- 3.7. All events are managed through measures secured through S106 obligations, including the Local Area Management Plan (LAMP) and bespoke travel plans to minimise disturbance to the local community. The LAMP was anticipated to be a single document but in practice this is now a 'live' document that can evolve and be updated as required. There is a main LAMP as anticipated, but also various LAMPs specific to other Major Non-association Football Events (MNFEs), such as concerts, NFL and boxing. The LAMPs are further refined through associated Transport Plans, which include the spatial and temporal extent of road closures; the management of regional coaches and shuttle buses; the management of pedestrians, cycles and taxis; street cleansing and waste collection; the provision of information; and management of public nuisance.
- 3.8. The bespoke Transport Plans typically comprise a Travel Demand Forecast (predicting mode shares and public transport entry/exit points) and the specific LAMP for the event. Management of events is further mitigated through a cycle and coach strategy, transport hub queue management strategy, reviews of modal split for travel to the Stadium, attendee retention and attraction measures, air quality reviews and a communications strategy.

Proposed Scheme Overview

- 3.9. The proposal seeks to amend the extant hybrid planning permission - reference HGY/2023/2137 through a 'Section 73' minor material amendment to Plot 1 of the hybrid permission.

3.10. The extant approved permission allows for unlimited association football matches but did apply a cap on Major Non-association Football Events. The application seeks to amend condition B9. This condition applies to MNFEs, which are categorised as those over 10,000 spectators, and currently states:

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

Reason: To protect the environment and amenities of the locality.

3.12. The term '**Major Non-association Football Events (MNFEs)**' refers to any event exceeding **10,000 visitors for non-association football**. The application proposes the following restrictions on these events:

- a permanent cap on the number of boxing events, with no more than two in a calendar year
- a permanent cap on the number of consecutive non-association football events, with no more than four in a row;
- a permanent cap on the number of non-association football events per week, with no more than five in one week; and
- unless agreed in writing with the Local Planning Authority, no more than two weeks in any calendar year where there are either four consecutive non-association football events in a week or five non-association football events in a week (to prevent the theoretical ability to stage all 30 events over a 6 week period).

3.13. This is detailed for ease of reference in the table below:

| | | 2016 Original stadium planning permission condition | 2023 and 2024 Condition negotiated and granted permission | 2025 onwards proposal |
|--------------------------------------|------------------------------------|--|---|---|
| Overall non-football major events | Overall cap | Capped at 16 | Capped at 16 | Capped at 30 |
| Music concerts | Cap | Capped at 6 | No cap (within 16) | No Cap (within 30) mindful of likelihood of NFL and other events |
| | Restriction on events in 1 week | No restriction. Unlimited | Only 1 week where >3 No other weeks >3 | 2 weeks in a year where up to 5 events in 1 week |
| | Consecutive events | No restriction. Unlimited | No more than 3 | Capped at 4 consecutive days |
| Boxing | Cap | No cap (within 16) | Capped at 2 | Capped at 2 |
| NFL | Cap | No cap (within 16) | No cap (within 16) | No cap (within 30) |
| Other info | | | 10 'Commitments' | <ul style="list-style-type: none"> Resident pre-sale window Community grant scheme |
| Conclusion | | N/A | Within overall cap of 16, more concerts allowed Restrictions on amount in 1 week | 30 events, cap on boxing, no cap on concerts Compared to 23/24 increased cap on consecutive events and increased 5 events in 1 week |

- 3.14. There is reference in the Planning Statement to 'intermediate' events, where capacity would be capped and there would potentially require less extensive road closure times, but these are untested by the relevant safety groups and are therefore not considered in this application.

Proposal Amendment

- 3.15. A refinement of the proposal has been provided during the consultation period of the planning application in order to ensure that the additional events are for 2025 followed by a review at the end of October 2025 (i.e. after next summer's concerts). The review process will be dependent on the number of events for 2025 exceeding 20 and will determine whether the review is in compliance or non-compliance. Should the review be in non-compliance then this process will repeat in 2026. If the 2026 review is determined to be in non-compliance, then the quantum of MNFEs will revert to 20. If the review is compliant then the cap of 30 will remain in perpetuity.
- 3.16. The review mechanism will consider the following criteria:
- Socio Economic Impact
 - ASB/street urination/MNFE toilet provisions
 - MNFE noise impacts (as currently measured)
 - Littering/street cleanliness
 - Car parking/enforcement (linked also to TP/mode share targets but also LBH Code of Enforcement)

- Road closures/traffic management issues
- Station queue management
- General compliance with LAMP

The Site and Surroundings

- 3.17. The site forms part of the ongoing phased redevelopment of the THFC Stadium and surrounding land. A hybrid planning application (part full permission and part outline permission) was granted in 2016 (Reference: HGY/2015/3000) and amended through S.73 (Reference HGY/2023/2137). The redevelopment of the site granted a phased development of plots, which includes the Tottenham Hotspur Stadium (now built), Tottenham Experience (substantially completed), hotel, sports centre ('Extreme Sports Building') and health centre. The part of the site relevant to this proposal is Plot 1, relating to The Stadium.
- 3.18. Other substantial redevelopment has been undertaken within the wider area, including redevelopments around Tottenham Hale and Seven Sisters since the original approval in 2016. On the western side of High Road, directly opposite the stadium is the site of the recently approved High Road West development.



Figure 1: Stadium in context

- 3.19. The Stadium has been completed and has been used for football and numerous other high profile sporting events and concerts. The Experience building is substantially completed but has yet to complete the cafe and outdoor seating part of that permission. The 'town square' approved on the podium level has yet to be fully realised and retains its interim landscaping, as does the public realm surrounding the site. The 'hotel' building on Plot 3 has also recently commenced construction.

Surrounding sites

- 3.20. The site is within the Northumberland Park Area of Change as per Haringey's Spatial Strategy Policy SP1. This is a designated Growth Area and contains a number of other site allocations designated within the adopted Local Plan and Tottenham Area Action Plan. The stadium itself is referred to as NT7 and is bounded by NT3 (Northumberland Park North) to the north, NT4 (Northumberland Park), to the east and NT5 (High Road West) located west of the site. A hybrid permission for the High Road West redevelopment has been approved under reference HGY/2021/3175 but there are currently no permissions for NT3 and NT4.
- 3.21. The plans for High Road West include a number of tall buildings and public realm and the progression of the application site and surrounding site allocations seek to transform the area through a mixed and sustainable community and leisure destination. That development will include a town square (Moselle Square) which forms part of the crowd safety route from White Hart Lane Station. That permission included a requirement for this route to be retained through all phases of development.
- 3.22. An overview of the approved High Road West development is provided in Figure 2 below.



Figure 2 – Approved High Road West Masterplan

4. SITE HISTORY SUMMARY

4.1. The following are key summaries of the site history, predominantly referencing those permissions relevant to the amendments proposed in this application.

- HGY/2010/1000 - Outline permission for demolition and redevelopment of the site - Approved in September 2011.
- HGY/2011/2350 - Outline permission for demolition and redevelopment of the site - Approved in March 2012.
- HGY/2015/3000 – Hybrid permission: Full permission for Stadium, Tottenham Experience, Hotel and outline permission for Extreme Sports building, mixed use commercial and 535 residential units and Community Health Centre – Approved in April 2016.
- HGY/2017/2565 – Condition B17 (Noise Control Plan) of HGY/2015/3000 - Approved 05/04/2018
- HGY/2018/0905 - Condition B15 (CCTV) of HGY/2015/3000 – Approved 17/05/2018
- HGY/2018/1400 - Condition B12 (LED Screen strategy) of HGY/2015/3000 – Approved 08/02/2019

- HGY/2018/1817 - Non-material amendment of Condition B10 (Fixed Illuminated Signage) to HGY/2015/3000 – Approved 18/07/2018
- HGY/2018/2168 - Condition B13 (Event Day Lighting) of HGY/2015/3000 – Approved 08/04/2018
- HGY/2018/2169 - Condition B27 (Car Park Management Plan) of HGY/2015/3000 – Approved 13/02/2019
- HGY/2018/2171 - Non-Material Amendment to Condition B14 (External Stadium Screens) of HGY/2015/3000 – Approved 14/08/2018
- HGY/2020/2108 - Non-material amendment to planning permission ref: HGY/2015/3000 granted on 15.04.2016, involving the stadium seating bowl and a consequential amendment to the approved maximum seating capacity from 62,303 to 62,850 - an increase of 547 seats – Approved 09/10/2020
- HGY/2021/1039 - Application for the approval of reserved matters relating to the scale of Plot 4 'The Extreme Sports Building' of planning permission HGY/2015/3000 granted on 15.04.2016 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works – Approved 19/07/202
- HGY/2021/1043 - Application for the approval of reserved matters relating to the appearance of Plot 6 'The Community Health Building' of planning permission HGY/2015/3000 granted on 15.04.2016 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works – Approved 15/06/2021
- HGY/2022/4504 - Application for the approval of reserved matters approval is sought in respect of 'landscaping' associated with Plot 5 (residential and B1/D1) associated with planning permission HGY/2015/3000 for the demolition of the existing stadium and the phased redevelopment of the site to provide a new stadium, hotel, Tottenham Experience; sports centre ('The Extreme Sports Building'); community and / or office uses; housing; health centre ('The Community Health Building'); and associated works – Approved 13/10/2023
- HGY/2023/0823 - Amendment following a grant of planning permission HGY/2015/3000, in order to amend condition B16 to remove the annual limit of 6 on concerts within the 16 major non-football events for the calendar year 2023 only – Approved 06/07/2023
- HGY/2023/2041 - Amendment following a grant of planning permission HGY/2015/3000, in order to amend condition B16 (as previously amended by

HGY/2023/0823), to remove the annual limit of 6 on concerts within the 16 major non-football events for the calendar years 2023 and 2024 only – Approved 04/10/2023

- HGY/2023/2137 - 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 (following previously approved amendments including HGY/2017/1183 to allow part residential (C3) use on Plot 3) for demolition and comprehensive redevelopment of the Northumberland Park Development Project through variation of Conditions A4 (Consented Drawings and Documents); A6 (Conformity with Environmental Statement) and Condition A7 (Maximum Quantity/Density) and D1 (Plot 3 specific drawings) under Section 73 of the Town and Country Planning Act (EIA development) - Approved 08/04/2024

5. CONSULTATION RESPONSE

5.1. The following were consulted regarding the applications:

Internal Consultees

- LBH Building Control
- LBH Environmental Health
- LBH Licensing
- LBH Planning Policy
- LBH Tottenham Regeneration
- LBH Transportation
- LBH Waste Management

External Consultees

- Arriva London
- Greater London Authority
- London Fire Brigade
- Metropolitan Police - Designing Out Crime Officer
- Residents Associations
- Transport for London

5.2. An officer summary of the responses received is below. The full text of internal and external consultation responses is contained in **Appendix 3**.

Internal:

Building Control (HBC) – No objection. Safety issues can be addressed through the SAG [Safety Advisory Group] and the extra resourcing will be dealt with directly

with the applicant (**Officer Response:** This will be resourced directly through Building Control Safety at Sports Grounds statutory functions rather than Planning)

Environmental Health - The additional events over the 16 currently approved will likely lead to additional complaints about noise, public nuisance and antisocial behaviour from residents. A revised condition B9 will be required for new monitoring spots to be agreed and the level for music noise at the nearest noise sensitive receptor should not exceed at 70dB (LAeq, 15 minutes) for any concert over the agreed 16 and 65 dB (LAeq, 15 minutes) for all other events. A requirement for a measuring off-site dB(C) (**Officer Response:** Noted and a condition has been amended accordingly)

LBH Licensing – The complaints line from Tottenham is fed into Licensing at BCLG so it is hard to get a full picture of the impacts. There are additional issues for residents from potentially 30 MNFEs above standard football. These bring additional ASB issues. There is also greater chance of clashes with other events, especially in summer. As such, additional resourcing will be required of £4,000 per event (**Officer Response:** The existing baseline is for 16 MNFEs so it is not reasonable to require additional payment for this. However, any additional MNFEs will be subject to the fee)

LBH Transportation – Existing events have been successfully managed and attendees were able to access and leave the area successfully. Existing S106 obligations help manage capacity even when there has been travel disruption. It is recommended that the Event day CPZ be further reviewed, alongside a “red route” emergency corridor. Regulatory Services require further resourcing for the additional events of £4k per event. A bespoke MNFE Travel Plan is required to reduce car travel, with a £30k monitoring contribution per year for 5 years. Cycle and coach strategies should be updated, specifically for MNFEs. Encouraging advance ticket window will help attract local attendees and improve walking mode share. Pedestrian Walking Routes within the S106 should be amended (**Officer Response:** There is some overlap between these obligations and existing obligations, for example, the CPZ is not required as part of this application as it is ‘triggered’ as part of another s.106 legal agreement. It is accepted that other requests require specific additional monitoring, so the fees have been included in the Heads of Terms of the legal agreement).

LBH Waste Management – An updated LAMP should be agreed prior to additional events being allowed. Cleaning around MNFEs should be undertaken by LBH or its appointed street cleaning contractor with the costs covered by the applicant. Formalising this process mitigates future risk and minimises the resource cost on the council. (**Officer Response:** It is understood that the applicant currently pays the Council's costs for street cleaning for MNFEs and that the platinum level is not required for all events. Covering costs for Football events is being discussed separately and is not the subject of this application).

External:

Greater London Authority (GLA) – Confirmation that this will not require Stage 1 referral, subject to addressing TfL comments.

Additional comment from deputy Chief of Staff outlines that: In an increasingly competitive world, it is imperative for London's cultural, music and sporting economy that the city maximises its assets. This makes the Tottenham Hotspur Stadium strategically important they must have the flexibility to perform their role effectively. Additional dates will allow London to attract more global artists, enhancing the city's cultural offerings and ensuring that London remains open for business.

London Borough of Enfield – Amendments to the Traffic Management Order (TMO) required for changes to permits and re-advertise the TMO. Cost of £2,500 (**Officer Response:** This will be secured in the S106).

Metropolitan Police –MPS were fully briefed by applicant prior to submission and this has been discussed internally. However, it is considered that the most appropriate place to make representations is through any future Licensing hearings.

TfL – Principle support of additional events in accordance with Good Growth. Review will be required to ensure best practice for scheduling Overground works around events. Improvements of marshalling required around Seven Sisters and review of ASB and toileting around Tottenham Hale. Information for bus driver diversions required in advance. Taxi rank marshalling required. Issues can be addressed through LAMP reviews, but request for further funding to cover extra staff. (**Officer Response:** As suggested in the comments, much of this can be actively addressed in the LAMP. There have been subsequent discussions around staffing and whether or not a financial contribution will be required).

LOCAL REPRESENTATIONS

- 5.1. The application was consulted on through neighbour notification letters to the immediate vicinity, over 20 site notices displayed in the vicinity of the site and around transport hubs and a press advert in the local newspaper.
- 5.2. The number of representations received from neighbours, local groups etc. were as follows:

No of individual responses: 62
Objecting: 49
Supporting: 12
Neither: 1

- 5.3. The main issues raised in representations from adjoining occupiers are summarised below.

Support:

- Benefits will outweigh harm
- Extra jobs and employment in the area
- Boom for local businesses
- Will help further regeneration
- Support on proviso that road closures reviewed
- Support on basis that there is community benefit fund

Objections:

Intensification of use:

- Increase is too great / too soon
- Existing issues need to be satisfactorily resolved first
- Drumsheds applying to increase events / hours
- THFC or MNFEs will be weekly occurrence
- Maximum so far has been 10, so should be more gradual increase
- If intermediate event brought in then should be lower level of 20k first
- This is a football stadium first and event space as an additional service

Socio-economic:

- People head straight to stadium – minimal economic benefit
- Claims of benefits are exaggerated – no independent review of economic results
- Should be trying to increase awareness of businesses in the area rather than just drawing attendees into the stadium
- Northumberland Park remains second most deprived ward in London
- Stadium aims to keep people in rather than using local businesses
- More free tickets required for residents

- Free tickets shouldn't be traded for more profit
- Extra income for the Club at residents' expense
- Residents pay council taxes for roads/ emergency services / litter collection etc that cannot be undertaken
- Typology of business focussed on visitors (fast food, betting shops) rather than for locals (small innovative creative businesses), many of which close on non-event days
- Wider economic base / wider commercial uses should be encouraged
- Area needs more than just the focus of Stadium to thrive
- Club needs to invest in local community events and organisations
- Lot of staff are not local
- Staff not properly organised for marshalling etc.
- Independent survey of impacts required
- Gig economy jobs rather than careers
- Transport Statement needs to be updated to include Drumsheds, newer road closures etc.
- Better consultation with neighbouring boroughs required
- Why is the Euros cited as a reason to increase – have capacity to provide unlimited football and 16 events

Noise and disturbance:

- Locals accept disruption from Spurs games as part of the established community but 30 events on top is excessive beyond the established level of disruption
- Restrictions on other stadia in similar sites e.g. 6 MNFEs at Emirates / 18 floodlit events at Lords
- Light pollution from floodlights
- Disruption will not be outweighed by benefits
- Overcrowding inhibits walking and public transport use
- Disruption of daily routines
- Residents trapped in their homes and difficult to plan visitors
- Hard to leave house with pram / if disabled on event days
- Honking of horns and hostilities
- Noise from stadium (PA announcements / general)
- Cumulative impact with events from Drumsheds
- BCLG have not had sufficient opportunity to help progress the LAMP and engage
- Lack of communication of events and closure times
- Communication needs to be improved – easily accessible information on events calendar or app and clearly signposted
- Link to <https://www.tottenhamhotspur.com/the-stadium/local/> is highlighted in comments but could be more prominent

Transport issues:

- Residents re-routed the long way around stadium
- Details of air quality results / traffic surveys to be detailed by Council
- Additional stress from road closures

- Increased reliance on residents having to plan lives around major events
- Need tangible benefits – improvement to infrastructure etc.
- Additional congestion on adjacent roads
- Issues of taxis and chauffeurs waiting (no enforcement if someone waiting in car)
- Increased stress on local transport
- PTAL 3 is not “highly accessible” (as stated in Planning Statement)
- No substantial improvements in infrastructure since stadium opened
- Appropriate parking required
- Drivers with lack of knowledge of routes and LTNs
- Larger area should be closed off for non-local drivers
- Further traffic filtering / LTNs required to stop rat runs of side / adjacent streets to High Road (LTNs focused in West Tottenham)
- Bromley Road (and other adjacent roads) not allowed to leave even in emergency
- Residents having to park further away on event days
- Length of time for road closures for certain events i.e. NFL
- Modal split for car use / cycling to be scrutinised - evidence of low car use?
- Transport impacts in Planning Statement focussed on football events not on non-football events
- Modal split for different types of MNFEs not specified in Planning Statement
- Long walk to bus during closures
- Cycle lane CS1 is partially closed on event day despite being advertised – danger for cyclists
- Lack of cycle storage
- Overcrowding at stations
- Demographic for events far wider – less likely to use public transport, especially late at night.
- EV charging points can be used by anyone on event day
- Unofficial temporary car parks encourage driving
- Parking restrictions have led to more off-street parking provision
- Abuse of blue badges - review enforcement
- Air quality issues from traffic backing up and engines revving (pollution already exceeds WHO limits)
Associated noise and air pollution

Issues with benefits:

- Tickets unaffordable to many residents
- Website for advance tickets often has broken links / webpage
- £5k contribution on events over existing 16 is insufficient compared to profit for Club

Not relevant planning considerations:

- Question over the wording of consecutive events and whether this would mean a football event would need to be in-between no-football events (**Officer Comment:** The meaning was clarified in conversation with officers that it would be consecutive MNFEs and would not need a football match to break the sequence)

Further Consultation

- 5.4. The applicant has undertaken their own public consultation prior to the submission of the application through the following means:
- 13 February 2024 - presentation at the Business and Community Liaison Group (BCLG),
 - 28 February 2024 - A public exhibition at the Stadium's M Café;
 - 20 March 2024 - A meeting of local businesses to establish how to maximise benefits of events
 - 25 March 2024 - A Ward Councillors consultation event at the Stadium.
- 5.5. During the consideration of the application the applicant has also engaged in a further special BCLG meeting on 19 June 2024 to discuss the improvements to the LAMP and to consult on the 'Blue Book'.

6. MATERIAL PLANNING CONSIDERATIONS

The main planning issues raised by the proposed development are:

1. Scope of Section 73 application
2. Policy Consideration
3. Regeneration overview
4. Principle of allowing additional events
5. Proposal detailed assessment
 - a. Assessment of proposal
 - b. Benefits / mitigations
 - c. Background
 - d. Intensification of use
6. Socio-economic benefits
 - a. Overview of socio-economic benefits
 - b. Impacts on local traders and wider area
 - c. Wider regeneration benefits
7. Noise and disturbance
8. Impact on Amenity of Adjoining Occupiers
 - a. Nuisance and anti-social behaviour
 - b. Litter and street cleaning
 - c. Concerts vs non-concert MNFEs
9. Transportation and Parking
10. Safety and crime
11. Equalities

12. Conclusion

6.1 Scope of Section 73 application

- 6.1.1 An application can be made under Section 73 (S.73) of the Town and Country Planning Act 1990 to vary or remove conditions associated with a planning permission. One of the uses of a S.73 application is to seek a minor material amendment, where there is a relevant condition that can be varied. A S.73 application results in a new permission being issued.
- 6.1.2 Guidance for determining S.73 applications is set out in the National Planning Practice Guidance (NPPG) which states that a minor material amendment is one “whose scale and nature results in a development which is not substantially different from the one which has been approved”. This is not a statutory definition and recent case law as clarified that provided changes do not impact on the ‘operative part’ of a planning permission they can be considered through a S.73 application. It is further stated that the development which the application under S.73 seeks to amend will by definition have been judged to be acceptable in principle at an earlier date. Consequently, the extent of the material planning considerations are somewhat restricted and only the amendments being applied for should be considered at this stage. Having said that, when determining the application, the local planning authority (LPA) will have to consider the application in the light of current policy. The LPA therefore has to make a decision that is based and focused on national, strategic and/or local policies which may have changed significantly since the original grant of planning permission as well as the merits of the changes sought.
- 6.1.3 Planning permission reference HGY/2015/3000, approved in 2016, was recently amended through S.73 process on 08 April 2024, with new reference HGY/2023/2137, which is the subject of this proposed amendment. Planning permission reference HGY/2023/2137 required consideration of the updates to planning policy and noted that with the exception of the adoption of a new London Plan in 2021 and alterations made to the National Planning Policy Framework (NPPF) in 2018, 2019, 2021 and 2023 since the granting of planning permission, the same policy documents used in the assessment of the proposal are currently adopted, and there are no further policy documents that have been adopted that materially alter the assessment of the current proposal. The overall policy approach relating to relevant considerations of socio-economic impacts, transport impacts and noise and disturbance remain broadly the same. Where relevant policy has been updated it is referenced within this report.
- 6.1.4 The S.73 application proposes to amend condition B9 of the recently amended hybrid permission reference HGY/2023/2137. This is the main focus of the assessment, although other conditions may require minor amendments to align with this assessment. Likewise, the relevant obligations within the S106.

6.2 Policy Consideration

6.2.1 *The Development Plan*

6.2.2 The Local Plan comprises the Strategic Policies Development Plan Document (DPD), Development Management Policies DPD and Tottenham Area Action Plan (AAP). These documents were all adopted after the determination of the hybrid planning application reference HGY/2015/3000 but were all considered within that assessment as emerging plans. The London Plan was subsequently updated in 2021 and these new policies are considered accordingly. Likewise, there have been updates to the NPPF and these are referenced where relevant.

The London Plan

6.2.3 The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. The London Plan (2021) sets a number of objectives for development through various policies. The policies in the London Plan are accompanied by a suite of Supplementary Planning Guidance (SPGs) and London Plan Guidance that provide further guidance.

Upper Lea Valley Opportunity Area Planning Framework

6.2.4 The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) is supplementary guidance to the London Plan. A Development Infrastructure Study (DIFS) in relation to the OAPF was also prepared in 2015. The OAPF sets out the overarching framework for the area, which includes the application site.

6.2.5 The OAPF notes the redevelopment of the High Road West area is supported by a comprehensive masterplan. The OAPF sets out the ambitions for the High Road West area to become a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development. This formed part of the assessment of the hybrid permission and remains relevant.

The Local Plan

6.2.6 The Local Plan Strategic Policies DPD sets out the long-term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's spatial strategy for achieving that vision. The Site Allocations development plan document (DPD) and Tottenham Area Action Plan (AAP) give effect to the spatial strategy by allocating sufficient sites to accommodate development needs.

Strategic Policies

6.2.7 The site is located within the Northumberland Park Area of Change as per Haringey's Spatial Strategy and Policy SP1 'Managing Growth' within the Local Plan. The Spatial Strategy makes clear that in order to accommodate Haringey's growing population, the Council needs to make the best use of the borough's limited land and resources. The Council will promote the most efficient use of land in Haringey.

6.2.8 Policy SP1 of the Local Plan requires that development in Growth Areas maximises site opportunities, provides appropriate links to, and benefits for, surrounding areas and communities, and provides the necessary infrastructure and is in accordance with the full range of the Council's planning policies and objectives.

Tottenham Area Action Plan

6.2.9 The Tottenham Area Action Plan (AAP) sets out a strategy for how growth will be managed to ensure the best quality of life for existing and future Tottenham residents, workers, and visitors. The plan sets area wide, neighbourhood and site-specific allocations.

6.2.10 The AAP indicates that development and regeneration within Tottenham will be targeted at four specific neighbourhood areas including North Tottenham, which comprises Northumberland Park, the Tottenham Hotspur Stadium and the High Road West area.

6.2.11 These plans and strategies set the context for Tottenham's regeneration. These documents should be read in conjunction with the AAP. The application site is located within a strategically allocated site – NT7 (Tottenham Hotspur Stadium).

6.2.12 The AAP states that for any future application for the site, the Council shall seek the following relevant criteria:

- Comprehensive redevelopment of the site;
- Complementary leisure and commercial uses;
- Support regeneration objectives to the east of the site with suitable interfaces;
- High quality public accessible spaces on non-match days;

6.2.13 The site is within a designated Area of Change and contains a number of other Site Allocations in the AAP within close proximity of the site. These include NT4 (Northumberland Park), located to the west of the site and NT5 (High Road West) located north east of the site. An urban design strategy has been approved for NT4 but no permission has been granted to date. A hybrid full planning / outline application for the High Road West redevelopment has recently been approved under reference HGY/2021/3175.

6.2.14 The Council is preparing a new Local Plan and consultation on a Regulation 18 New Local Plan First Steps documents took place between November 2020 and

February 2021. The First Steps document sets out the key issues to be addressed by the New Local Plan, asks open question about the issues and challenges facing the future planning of the borough and seeks views on options to address them. It currently has very limited material weight in the determination of planning applications.

Masterplan and site wide delivery

- 6.2.15 The THFC Stadium is the first stage of wider regeneration, and the intention is for it to be fully integrated within the comprehensive regeneration of High Road West and Northumberland Park. The priority is to ensure that on match and non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development.
- 6.2.16 The changes to the London Plan and NPPF were considered in the recent S.73 permission for the changes to the 'hotel' in Plot 3 (HGY/2023/2137). These policies retain a desire for use of sustainable sites for mixed use residential development. The proposed development would remain as a comprehensive redevelopment, with an increase in additional events only. The masterplan would retain complementary leisure and commercial uses. The stadium has been delivered and has been and continues to be a successful forerunner for the wider site delivery, with substantial public benefits by keeping the football club in the area, as well as the high profile non-football events that the stadium has been and continues to be used for. The Tottenham Experience building (Plot 2) has been partially delivered and is anticipated to be fully delivered alongside the hotel and residential development in Plot 3, within the next phase of development. The final phase of development will deliver the leisure, residential, commercial and community developments in Plots 4, 5 and 6.
- 6.2.17 The complementary leisure and commercial uses other than the stadium and Tottenham Experience include the Extreme Sports building (Plot 4), the lower levels of the residential blocks (Plot 5). These remain in outline stage and are yet to be finalised in design. The recently approved Section 73 amendment application HGY/2023/2137 reinforced that there will be phased opening of the wider masterplan site and public realm as this develops. The phasing schedule indicates that Phase B will complete the Tottenham Experience building alongside the delivery of the hotel on Plots 2 and 3 by the 4th quarter of 2027, as well as providing relevant associated landscaping within this part of the podium. Phase C will see the delivery of the Extreme Sports building and predominantly residential towers on Plots 4 and 5, alongside the completion of the permanent landscaping of the podium and is expected to be delivered by the second quarter of 2028.
- 6.2.18 The community medical centre approved for Plot 6 was not referenced within the approved phasing. The only remaining reserved matters approval for that plot was approved in June 2021 with a requirement that construction commence within 2

years of the final reserved matters approval. That part of the permission has now expired but the Club are exploring options to progress that plot.

6.2.19 The proposal retains the majority of uses aligned to the 2015 hybrid permission, although these have been updated through various non-material amendments post-decision.

6.2.20 Overall, it is considered that the uses within the masterplan will comply with the uses as approved under the extant permission and remain acceptable in as part of this S.73 application in creating a transformative, stadium led-mixed use development for the site.

6.3 Regeneration overview

6.3.1 The approved hybrid permission HGY/2015/3000 was approved in 2016 on the basis of this masterplan being a prominent driver of regeneration in the area. The existing socio-economic circumstances of White Hart Lane and Northumberland Park wards as the 2nd and 5th most deprived wards in London (124th and 190th nationally) at the time provided context for the need for regeneration. Retaining Tottenham Hotspur FC in the locality was, and still is, a key part of that regeneration and the successful delivery has already provided local socio-economic benefits.

6.3.2 These regeneration ambitions are reflected in the Local Plan Strategic Policies document and the Tottenham Area Action Plan and the various improvements in health, lifestyle and opportunities that improvements in the area would achieve. The importance of having a well-known club and prominent stadium was cited as a means of changing people's views of an area, increasing local pride and encouraging newcomers to set up homes and businesses.

The assessment of the hybrid permission highlighted these issues in detail along with the significant economic benefits that the masterplan would have for the area.

6.3.3 As well as the economic benefits, the assessment of the hybrid permission also highlighted the community endeavours undertaken by the Club, in particular with Tottenham Together, Percy House Future Skills Hub and the Tottenham Foundation. An Ernst & Young Economic Assessment has been submitted with the current application which outlines the socio-economic benefits of the existing stadium and events and is discussed in more detail below. This also refers to the community programmes that the Club is involved in, including employment, training and apprenticeships, as well as promoting physical health and wellbeing and a sense of community safety. The original approval of the hybrid permission also highlighted the benefit of securing additional housing, community uses, leisure and health facilities as benefits of the masterplan, which are benefits retained in this amended application.

6.3.4 Whilst the socio-economic benefits of retaining the stadium in the area and associated regeneration are significant, they were assessed in the original permission. Although it is expected the additional parts of the residential, community, sports and health / alternative community facilities may be forthcoming, the benefit was assessed when the original approval and 16 additional events were approved. The overall benefit of retaining the stadium, team and additional prestige of events is acknowledged and forms a relevant background of benefit to the area, but the more relevant consideration in this amendment is what benefit the additional MNFEs will have. The balance of socio-economic benefit and impact from the relaxation of the cap on those MNFEs is considered within this report.

6.4 Principle of allowing additional events

6.4.1 The current National Planning Policy Framework (NPPF) was updated in December 2023. The NPPF establishes the overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local development plan process.

6.4.2 Section 2 of the NPPF considers how sustainable development can be achieved. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. This goes on to outline that sustainable development has three overarching and interdependent objectives in achieving this. These are:

- **economic objective** to support strong, responsive and competitive economy build support economic growth, innovation and improved productivity and provision of infrastructure;
- **a social objective** to support strong, vibrant and healthy communities meeting the needs of present and future generations and consider safety, provision of services and support communities’ health, social and cultural well-being;
- **an environmental objective**, focusing on environmental and heritage issues, as well as minimising waste and pollution.

6.4.3 Section 6 of the NPPF details how to build a strong, competitive economy and places significant weight on the need to support economic growth, taking into account both local business needs and wider opportunities for development. The NPPF also notes the importance that the planning system can play in facilitating social interaction and creating healthy and inclusive communities. This also seeks to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.

6.4.4 Section 7 of the NPPF considers the viability of town centres. This refers to the role that town centres play in the heart of local communities and hat a positive

approach to their growth, management and adaptation is recommended. This recognises the need for policy and decisions to help grow and diversify to allow a suitable mix of uses (including housing), the need to create positive strategy for the future of primary shopping areas and town centres and the role of residential development in enhancing viability of town centres.

- 6.4.5 London Plan Policy GG1 considers 'good growth' and seeks to support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation. Policy GG5 seeks to ensure that benefits of economic success are shared more equitably across London.
- 6.4.6 London Plan Policy E10 recognises the benefit of retaining and enhancing existing venues stating that areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally renowned culture, performers and productions.
- 6.4.7 The Tottenham Area Action Plan (TAAP) recognised that the stadium can help in establishing Tottenham as a premier leisure destination for London whilst also retaining and enhancing a more local retail function to support the community.
- 6.4.8 In short, these policies recognise the need for diverse socio-economic base with a diversity of commercial uses within town centres and the role that the stadium and associated events can play in driving this change. The socio-economic base relies in part on high quality and well design residential development and an environment that encourages further growth, including the important relationship with existing and future development. This also recognises the benefit of retaining and enhancing the profile of the stadium at the forefront of regeneration and vitality of centres.
- 6.4.9 The planning balance in this assessment is whether the additional socio-economic benefits, including for residents and businesses, outweigh the disruption to day to day life of current and future residents and businesses.

6.5 **Proposal – detailed assessment**

- 6.5.1 The approved permission HGY/2015/3000 (subsequently amended as HGY/2023/2137) allowed for unlimited association football matches and a cap of 16 Major Non-Footballing Events (MNFEs), 6 of which can be concerts. However, there were no other restrictions within this condition beyond these quanta. The applicant proposes to introduce further restrictions to help mitigate the potential adverse impacts of the increase in MNFEs. The proposed restrictions are outlined above, but to reiterate, these would:

- Limit the occurrence of concerts on consecutive days to no more than 4 in a row and no more than 5 in a week;
- Ensure that such consecutive occurrences do not occur in more than two weeks in any calendar year;
- Not more than 9 events within a 2 week period;
- A further cap of 2 boxing events per year is also proposed.

The following table breaks this down as follows:

| | | 2016 Original stadium planning permission condition | 2023 and 2024 Condition negotiated and granted permission | 2025 onwards proposal |
|-----------------------------------|---------------------------------|--|---|--|
| Overall non-football major events | Overall cap | Capped at 16 | Capped at 16 | Capped at 30 |
| Music concerts | Cap | Capped at 6 | No cap (within 16) | No Cap (within 30) mindful of likelihood of NFL and other events |
| | Restriction on events in 1 week | No restriction. Unlimited | Only 1 week where >3 No other weeks >3 | 2 weeks in a year where up to 5 events in 1 week |
| | Consecutive events | No restriction. Unlimited | No more than 3 | Capped at 4 consecutive days |
| Boxing | Cap | No cap (within 16) | Capped at 2 | Capped at 2 |
| NFL | Cap | No cap (within 16) | No cap (within 16) | No cap (within 30) |
| Other info | | | 10 'Commitments' | <ul style="list-style-type: none"> • Resident pre-sale window • Community grant scheme |
| Conclusion | | N/A | Within overall cap of 16, more concerts allowed Restrictions on amount in 1 week | 30 events, cap on boxing, no cap on concerts Compared to 23/24 increased cap on consecutive events and increased 5 events in 1 week |

6.5.2 Although these proposed restrictions are welcomed in the context of the proposed increase in events, these are restrictions of mitigation for the relaxations to the condition rather than a significant improvement on the existing permission. The only occurrence of more than two events in a week were for the 2023 Beyoncé concerts, which were Monday and Tuesday, followed by a break on Wednesday, then a one off concert on Thursday, before another break on Friday and then resuming the concert on Saturday and Sunday, as detailed in **Appendix 4** (appendices 6 and 8 of that document) These appendices contain details of events and previous year calendar, which show there were also no non-concert MNFEs that required events on consecutive days. The existing cap on a total of 6 concerts would mean that anything above 5 events in a week would have used the annual quota within that week. As such, whilst the restriction on frequency of events is welcomed it would be a mitigation of the relaxations rather than a benefit over the existing situation.

6.5.3 Similarly, there has only ever been two boxing matches at the Stadium, so these have not had a frequency to suggest that the cap of 2 a year would be a significant improvement on the existing demand. However, this restriction would remain in

perpetuity and the boxing events have had the most impact on the local community, so the restriction is therefore welcomed as a recognition that these will be infrequent.

- 6.5.4 NFL games and any other MNFE's currently have no cap and no further cap on these events is proposed.

Benefits / Mitigation

- 6.5.5 As well as the caps on the proposed events outlined above, the applicant has suggested additional mitigation measures to help compensate disruption to the local community including:

- a contribution of £5,000 per additional event (over the existing cap of 16) to a community fund;
- at least 100 free tickets to all MNFEs for local residents; and
- a 24-hour advanced ticket window for all residents within the immediate vicinity for full priced tickets (N15, N17 and N18 postcodes).

- 6.5.6 There are currently no obligations on the applicant to provide any contribution, free tickets or advanced windows other than for THFC matches. As such, the free tickets and advanced ticket window are considered to be significant benefits for local residents with an interest and / or financial means to purchase tickets. These will apply to all MNFEs, not just the uplift above 16.

- 6.5.7 The community fund will also provide some financial means for local projects in the area. This will form part of the S106 legal agreement.

Review mechanism

- 6.5.8 The significant intensification of the use from the existing cap still remains relatively untested and for this reason officers have suggested a review mechanism that will require further monitoring of MNFEs to ensure that any impacts can be successfully mitigated. It is anticipated that the MNFEs will be able to continue to benefit the surrounding area without causing significant harm to the local character but should this not be possible then the review mechanism will allow a reduced number of any criteria (consecutive events, events in a week, total boxing, or any other specific type of event) or in the worst case scenario would reduce the cap back to 16 events.

- 6.5.9 The review mechanism would provide certainty for the club that they could operate 30 MNFEs for the year of 2025 and provide suitable monitoring and review of a larger quantum than the maximum of 10 MNFEs currently hosted at the Stadium. The review process will be dependent on the number of events for 2025 exceeding 20 and will determine whether the review is in compliance or non-compliance.

Should the review be in non-compliance then this process will repeat in 2026. If the 2026 review is determined to be in non-compliance then the quantum of MNFEs will revert to 20. If the review is compliant then the cap of 30 will remain in perpetuity.

6.5.10 The review mechanism will consider the following criteria:

- Socio-economic benefits
- ASB/street urination/MNFE toilet provisions
- MNFE noise impacts (as currently measured)
- Littering/street cleanliness
- Car parking/enforcement (linked also to TP/mode share targets but also LBH Code of Enforcement)
- Road closures/traffic management issues
- Station queue management
- General compliance with LAMP

6.5.11 The purpose of the review mechanism is to ensure that there is an opportunity for the Council to attenuate the impact of the increase in events, whilst providing the Club an opportunity to prove that these can be operated successfully and that impact on the local community would be managed and mitigated appropriately. This will run alongside the existing S106 obligations, such as the LAMP and will be accompanied by a continuation of BCLG and the complaints lines, so that residents and local stakeholders have an opportunity to feedback.

6.5.12 The review mechanism will form part of the S106 and is included in the Heads of Terms.

Background

6.5.13 The removal of the cap on concerts was approved on a temporary basis for the non-material amendment applications references HGY/2023/0823 and HGY/2023/2041 but these were for a fixed one year period each covering 2023 and 2024 only and the overall 16 MNFE cap was retained.

6.5.14 The previous applications for additional concerts were supported by a list of commitments that the applicant would undertake following the grant of permission. These included the following action points and relevant updates:

- **Stewarding improvements** – Permanent staff in supervisory roles are currently being employed around main transport hubs. Briefing packs are also given to all staff so that they are aware of the key information. This ensures stewards have local knowledge of the area and event day operations. Stewards may also be redeployed when requested when by the local community.

- **Litter and ASB improvements** – Enhancements to the LAMP have addressed issues of ‘wet spots’ and other ASB. The litter and clean up for MNFEs is largely paid for by the applicant and undertaken by LBH staff, rather than private contractors. The request from Regulatory Services to fund more officers is also welcomed as a means of addressing such issues.
- **Economic benefits** – The economic benefits of events are assessed in detail below. A community fund, free ticketing and advance booking window is also proposed.
- **Ensuring benefits for traders in Tottenham** – The applicant has engaged in discussions with traders and has agreed to the principle of a Business Charter. A subsequent meeting between LBH and the Club has confirmed a draft version of this to coordinate and promote all businesses and external-led events, production of a map and directory of local businesses, linking players and artists to local businesses, hold training sessions for local businesses in social media / communications. A draft Business Charter is attached to the application file and a S106 obligation will ensure these details are finalised.
- **Review of toilets and signage** – This has been addressed in the revised LAMP with additional signage provided to ensure toilets can be easily found.
- **Improvements to communication of events** – **Appendix 5** provides detail of ways in which residents can receive notifications of events and communication with the Club. This will also be highlighted with the launch for the new ‘Blue Book’ and within that document. The Blue Book provides an overview for residents about the Club and operations, how events are managed and disruption to day to day life. This also provides contact numbers for complaints and details for how to stay connected with latest updates.
- **Review of concentration of events** – Controls on the concentration of events have been included within the current proposal which has not been tested beyond the concentration for the Beyoncé concerts. A review mechanism of the proposed condition is recommended and will provide a means of reviewing any impacts in the future.
- **Concluding review of the of the LAMP, including consultation of the ‘Blue Book’** – A special BCLG meeting was held on 19 June 2024 to cover the changes to the LAMP and as a means of consultation for a revised Blue Book. These discussions are ongoing but the response has been broadly positive from LBH and BCLG members. Officers are clear that further engagement meetings on the LAMP must continue on a regular basis for BCLG.

Intensification of use

6.5.15 The proposed increase in events would be on top of the existing uncapped men’s and women’s association football events; any other additional football events (such

as the Euro 2028 matches); and the 16 events already permitted. The base amount of men's football matches is 19 home games, plus any midweek European matches, FA and League Cup matches (where drawn at home) and any friendlies. There has been a significant increase in popularity of women's football since planning permission was granted in 2016. Although the Women's team predominantly play at Brisbane Road (Leyton Orient) there has been an increase in matches held at the Stadium, with 3 matches hosted in the 2023/24 season – and it is envisaged that the popularity will increase over time. Indeed, the Chairman's message in the Financial Results, June 2023 state a desire to increase these further. Whilst the success and growth of women's football is welcomed it does have potential to further add to the total events at the stadium.

6.5.16 Regardless of any increase in women's football, it is reasonable to assume that the total matches could be up to around 30 or even greater depending on the success of the THFC teams. The increased number of total Major Events would have potential to be 60 if the proposed relaxation of the cap is approved, although the applicant has emphasised that this is not expected to be fulfilled every year. In this reasonably anticipated scenario, this would be an event approximately every 6 days, if spread evenly throughout the year, compared to almost one every 8 days under the current restrictions. It is more likely that in practice the MNFEs would be focussed in summertime and in higher concentration at a time when residents might be using outside spaces, local businesses and food and beverage uses. This is reflected in the indicative schedule in **Appendix 4** (appendix 7 of that document), which plots an indicative timetable of how potential MNFEs might look. These closed season periods would have traditionally been a period of respite from such associated disturbance from events as there would have been limited football activity. The frequency of events would also likely mean that more weekends than not would be subject to a Major Event and associated disruption to the day to day life, as expressed by residents in the objection letters.

6.5.17 It is important to note the Club does not envisage hosting 30 events every year, as its ability to do so is partly dependent upon the number of football matches being played and the amount of time that the pitch can be kept within the pocket (when the pitch is moved out of the stadium 'bowl' for third party events). Success on the pitch resulting in increased games would also limit the free dates for the number of MNFEs, so there is not a direct correlation between success and more events, as this would create more restrictions on MNFEs. The Planning Statement notes this with regard to Euro 2028 games, which will be played at the time when concerts would normally be held and the logistical limits that would place on hosting MNFEs. As such, the amendment is sought to provide the applicant with more flexibility rather than as an expectation that 30 MNFEs would be achieved every year. The additional flexibility as cited is a requirement for the stadium to remain competitive on a national and international platform.

- 6.5.18 The maximum number of MNFEs to date has been 10, which took place in 2023 (detailed in **Appendix 4** (sub appendix 8)). That year also had only one domestic cup fixture and one European football match, meaning there was only a total of 36 Major events in the calendar year. As such any potential increase approaching 60 total events in a year remains very much untested. Likewise, there have only ever been events on 2 consecutive days and only once has there been more than 2 MNFEs in a week (5 nights for Beyoncé). The management of the stadium and refinements to the LAMP are accepted to help mitigate impacts of all Major Events but regardless of how well events operate there will be an impact on local residents through these intensifications.
- 6.5.19 These concerns have been expressed to the applicant and an amendment has been received in the Letter dated 08 July 2024 which agrees to the use of review mechanism. This review mechanism will allow for residents, businesses, surrounding Boroughs and, ultimately, LBH, to assess the impacts of the proposed intensifications in MNFEs. This will also provide a reasonable timeframe for the Club to identify further improvements and refinements to the running of events and management of the LAMP. As such, the review mechanism will be required through a S106 obligation.

6.6 **Socio-Economic Benefits**

- 6.6.1 London Plan Policy HC5 'Supporting London's culture and creative industries' also states that development proposals should enhance existing venues especially where they can provide an anchor for local regeneration and in areas with a good public transport connectivity.
- 6.6.2 London Plan Policy E10 recognises the benefit of retaining and enhancing existing venues stating that areas of international or national significance play a crucial role in putting London on the world stage, bringing internationally renowned culture, performers and productions.
- 6.6.3 Local Plan Policy SP1 (Managing Growth) states that the Council will focus growth and promote development in three Growth Areas, one of which is North Tottenham, which includes Northumberland Park, containing the Tottenham Hotspur Football Stadium.
- 6.6.4 The Site Allocation for Tottenham Hotspur Stadium (NT7) recognises the need for the Stadium to be a destination on match and non-match days and to contribute to creating a wider commercial and visitor destination for the area.
- 6.6.5 The original assessment of the proposed stadium recognised the importance of having a well-known club and prominent stadium as a means of changing people's views of an area, increasing local pride and encouraging newcomers to set up homes and businesses in the area. The same can be said for the boost in prestige

to the area from having world renowned artists perform at the stadium and the boost this has to the area.

6.6.6 The latest supporting letter from the applicant, dated 22 July 2024, has referenced a press release from the Mayor of London citing a Visit London poll on 20 June 2024 explained how the recent Taylor Swift tour generated £300m million for the Capital's economy and confirmed its status as a World leader for music. It demonstrates the importance of major artists in raising the profile of London and the areas around its venues. The letter highlights that the Visit London poll found that:

- 54 per cent of people said they would consider travelling to London for a music event in the past year – higher than New York, LA, Paris and other UK cities.
- 76 per cent would extend their trip after visiting a music event here, 77 per cent agree London offers a variety of music events and 72 per cent think the capital attracts the best international artists.

6.6.7 Those Taylor Swift events were at Wembley rather than the Tottenham Hotspur Stadium but highlight the boost to London from having such prestigious artists playing extended dates in the capital. The Mayor's Deputy Chief of Staff has specifically highlighted this in the letter of support for the application and how London should maximise its assets, such as the THS.

6.6.8 The success of the stadium as a multisport and music venue is detailed in the regeneration section alongside the associated benefits that the existing stadium and events have had on the area. The Planning Statement references the Ernst & Young assessment of Gross Value Added (GVA) from THFC within the Borough as £296m in 2021/22 and £478m in GVA across Greater London. The report also highlights that this is expected to grow within the borough to £549m by 2026/27. The Ernst & Young report estimates THFC's contribution in terms of employment is forecasted to grow from 3,700 to 4,300 FTEs by the 2026/27 season.

6.6.9 The GVA methodology consists of direct impacts (money spent inside and outside the stadium); indirect impacts from economic activity stimulated through the supply chain; and induced impacts from additional activity supported by employment income and consumer spending.

6.6.10 The assessment of expenditure inside the stadium is based on financial information provided by THFC and NFL accounts, whereas spending from outside the stadium was based on data from ONS and Visit Britain on spending patterns of domestic and international tourists in the UK to derive an estimated spending profile for visitors.

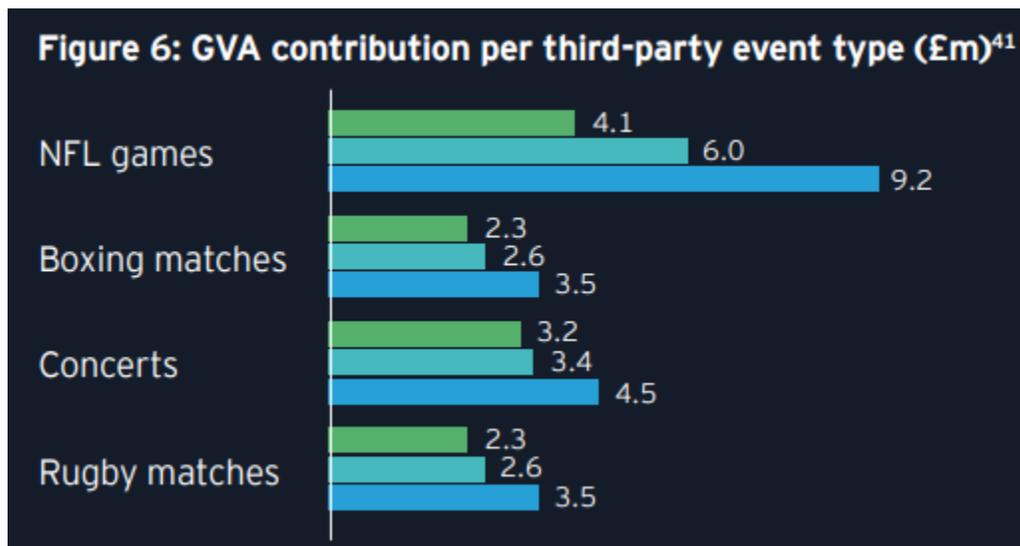
6.6.11 The supplementary letter received from the applicant, dated 08 July 2024, clarifies that any primary analysis of shops would be dependent on local businesses being able or willing to provide details of additional takings or staffing requirements

arising from specific events. To provide a more localised granular analysis of local spend would require local business to provide details of their takings and staffing levels during specific events which would be challenging to ensure accurate data was provided. The letter also references a similar scheme for additional events at the Emirates Stadium (this was an Appeal Decision by the Planning Inspectorate ref: APP/V5570/A/13/2202521), where a similar methodology of questioning local businesses was criticised by the Inspector. As such the data sources are considered to be a reasonable gauge on GVA assumptions sufficient for an overview of benefits.

6.6.12 The GVA inputs also detail that Tottenham Hotspur generated a total GVA contribution of £344m in the tri-borough area (Haringey, Waltham Forest and Enfield) in 2021/22, including both onsite and offsite activity, with £229m of this from direct (onsite and offsite) impact of Tottenham Hotspur’s activities. A further £70m is stimulated by spending within the Club’s local supply chains (indirect) and £45m from spending of employment incomes (induced spending). The report also summarises that there is £105m of expenditure in the tri-borough supply chains.

6.6.13 These are benefits of the existing stadium and events, which are recognised as having had a significant socio-economic benefit for the local and wider economy. The application is a minor material amendment to the original extant permission so is expected to increase these socio-economic benefits.

6.6.14 Figure 6 of the Ernst & Young (EY) report considers third party events (MNFEs), estimating the GVA contribution per event. This is broken down into specific types of events (NFL, boxing, concerts, rugby matches), as well as benefits for Haringey, Tri-Borough area and London as a whole. The report highlights the international visitor wider appeal of NFL games and higher spending of those events. Concerts are also highlighted as more beneficial than rugby and boxing matches in this regard.



Haringey
 Tri-borough area
 London

41. NFL game impacts are relatively high compared to other types of third-party event, driven by significant levels of visitor spend (including hotel expenditure) and commercial activity.

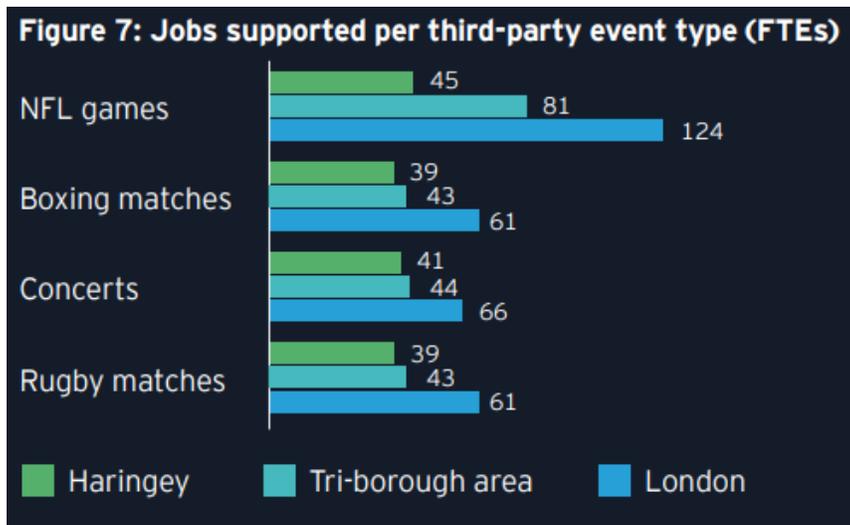
6.6.15 It is not possible to disaggregate how much is spent inside and outside the stadium from the EY report but was widely accepted that the figures do show significant boost to the economy through the additional third party events. A subsequent letter, received 22 July 2024, has looked into these benefits in more detail and clarifies that approximately 60% of the GVA per event (between £1.3m and £2.5m) was spent inside the Stadium and around 40% (between £1m and £1.6m) was spent outside. GVA within the stadium also benefits the local area through Club expenditure on local supply chains. During the financial year 2023/24, the Club spent £18.2m on goods and services with businesses based in the N17 post code area, as quoted in the letter dated 22 July 2024.

6.6.16 The report states that these contributions to the local economy are through the additional 60% increase in local footfall and associated money spent by visitors to the stadium on accommodation, transport, food and drinks. The report highlights that there are additional benefits of third-party activity through salaries of stadium employees, hire fees and in-stadium visitor expenditure. Overall, these GVA figures are considered to have positive weight in the balance of impact. Testimonies have been presented at BCLG and from local trader testimonies in the submission as benefits from the additional events.

6.6.17 The Club employs a significant number of permanent and casual employees in this area of London, which remains one of the most deprived areas in London with lower proportion of economically active residents and associated health and wellbeing issues. The table below highlights the local base for employment.

| | Local (5 mile radius) | Total Count | % employed locally (5 mile radius) |
|---------------------|-----------------------|--------------|------------------------------------|
| Permanent Employees | 235 | 780 | 30% |
| Event Day (Casuals) | 995 | 1,520 | 65% |
| Total | 1,230 | 2,300 | |

6.6.18 Figure 7 in the EY report specifically considers the employment benefits of third party events, again breaking this down by event and geographical benefits. Significant employment benefits within the locality as well as the wider community. Those additional hours of employment will have induced benefits of additional spending within the economy as well. The Club also has a London Living Wage policy for all employees, suggesting a high quality of employment. The most recent supporting letter from the applicant has highlighted testimonies from local residents about how the Club has helped them into employment.



6.6.19 Each individual event delivers up to £4.1m GVA for Haringey (£9.2m for London) and supporting the equivalent of up to 45 FTE jobs (124 FTE jobs for London) based on data from actual events in the 2021/22 season and comprise £2.3M & 39 jobs for rugby matches and boxing matches, £3.2M & 41 jobs for concerts and £4.1M & 45 jobs for NFL games. The NFL in particular also included over 70% of jobs created outside of the stadium (33 FTE out of a total of 45); 66% of the concert jobs were outside (27 FTE out of a total of 41) and 56% of boxing and rugby event jobs were created outside of the stadium (22 FTE out of a total of 39).

6.6.20 The EY report concludes that during 2021/22 season (and the following summer), the Stadium hosted two NFL games, two rugby matches, four concerts and a boxing match, generating £47m of GVA and over 700 jobs across London. An increase of 14 additional events has the potential to generate around 48 additional jobs in Haringey.

Impact on local traders and the wider area

6.6.21 There have been ongoing discussions between LBH Regeneration and Economic Development service and the applicant about how the Club can encourage further engagement between attendees and local businesses. A draft Business Charter has been agreed in principle by the applicant, along with the broad benefits highlighted therein. These include advertising local businesses in the stadium, providing a local book of these partnering businesses and provision of a map of local businesses. An agreed Charter will be required within a reasonable timeframe. This will form part of the S106 legal agreement.

6.6.22 The impact on local food and beverage uses in the vicinity on event days is broadly positive. Concern has been raised that these uses often do not open on non-event days, which impacts on the vitality of the shopping parades at those times. However, it is considered that this is an issue associated with the existing Major

Events rather than something specific to the proposed additional events. The proposed additional events would likely result in the local businesses also operating on the proposed additional event days thereby resulting in a positive impact for local businesses.

6.6.23 Concern for the vitality of the shopping parades has also focused on the popularity of more food and beverage establishments and other uses that appeal to occasional visitors rather than the local community. There has not been significant concern raised through the traders' representation at Tottenham Traders Partnership nor in BCLG events held in relationship to the current application or LAMP amendments. As above, this appears to be an existing issue that may be partially exacerbated but appears somewhat anecdotal. As with the narrow socio-economic base, referenced above, this is considered to have a neutral impact from the proposed increase of events.

6.6.24 A concern raised in the Emirates appeal was that an increase in the number of concerts, which are more likely to occur in evenings and on weekdays would mean that there is less time for attendees to explore the area and have associated spending in the local community. This is based on the idea that attendees may be attending from work and having to leave soon after the event due to the late night finish time. Any assumptions on that basis are anecdotal and there has not been the customer surveying or monitoring required to confirm this one way or the other. Regardless of the total spending potential outside the stadium, the net impact would be more spending than the baseline for non-event days. However, that spend outside of the stadium may be less than the averages assumed from events to date.

6.6.25 Comments from LBH Licensing have raised a concern about unauthorised trading, ticket touting and street drinking associated with events at the Stadium. Additional resourcing to address this is requested by the LBH Licensing team. This is something that was not foreseen in the 2016 approval and has been a drain on local authority resources. As such it is considered that this be applied to all additional MNFEs going forward, although it is not considered reasonable to apply this to the existing 16 MNFEs previously approved. More detail on this has been provided in "Amenity" section of this report.

6.6.26 Overall, it is considered that the additional footfall will have a net positive impact on the vitality and viability of the shopping parades and although this may be less significant than suggested by the applicant, would be beneficial over non-event days.

6.6.27 As well as the economic benefits of the additional events, the ability to attract world renowned artists and events has the benefit of improving the prestige of the area. This was apparent in the recent run of Beyoncé concerts, which were cited as highlighting Tottenham as a prestigious location for music. It is also noted that the applicant seeks to encourage these artists to spend time in the community and

engage with local businesses and notes that Beyoncé's charity 'BeyGood' also contributed £8k to a local business. It is important to stress that these charitable donations are at the bequest of the artist rather than a secured planning benefit but do add to the overall positive impacts from having prestigious events and artists perform in Tottenham.

- 6.6.28 The benefits proposed through the S106 obligations are considered separately in this report, but it is important to also note that there are socio-economic benefits proposed through the provision of the community fund, which has potential to be invested in local programmes and regeneration in the area.

Wider regeneration objectives

- 6.6.29 It is of note that there have been a number of completed, commenced and approved developments yet to be implemented since the 2016 approval of the hybrid permission. The most relevant of these is the High Road West approval – reference HGY/2021/3175 on the western side of High Road, between the Stadium and White Hart Lane Station. The safe walking route outlined for the hybrid permission of High Road West requires access through the proposed Moselle Square, which was approved as part of that scheme and linking White Hart Lane Station to the Stadium. The use of this as a through route for the existing MNFEs and football events could limit the potential for community events within this square in some evenings and weekends. Although this development has not commenced the permission remains active and the inter-relationship between these sites is a relevant consideration.
- 6.6.30 The increased frequency of this safe walking route could inhibit the use of that space for community events, especially given that these would be focussed on weekends in summertime. This has been raised with the applicant and they have referred to the community fund already proposed and that this is already more generous than other stadia in London. It is acknowledged that the temporary closure / increased presence through that emerging development will have an impact on the usability of that space for smaller scale community events. However, there will also be positive impacts through the increased football for commercial occupiers surrounding this space. Although additional events will further impact the use of this area, the impact is considered to be outweighed by the substantial wider public benefits from the stadium and socio-economic benefits and at least partially benefitted by the community fund. On balance this is considered to be a neutral impact.
- 6.6.31 The latest supporting letter regarding the Community Fund, dated 22 July 2024, has highlighted the wider community work that the Club undertake, aside of the community fund. This includes the recent partnership to tackle Serious Youth Violence (SYV) between the Club and the Foundation following an approach by the Council's Youth Justice Service. Whilst not directly linked to this application for

additional MNFEs it does illustrate the wider context of community work that is undertaken by the Club in the locality.

6.7 Noise and Disturbance

Policy and background

- 6.7.1 The NPPF states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- 6.7.2 London Plan Policy D13 introduces the concept of 'Agent of Change', which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on proposed new noise-sensitive development. Policy D14 of the London Plan sets out requirements to reduce, manage and mitigate noise. London Plan Policy D14 also seeks to separate noise generating uses from housing or ensure that there is appropriate mitigation where this is not possible and minimise noise from development and to improve health and quality of life. Similar objectives are included in Policy DM23 of the DM DPD.
- 6.7.3 World Health Organisation Community Guidelines (WHO, 1999) and the Noise Council's Code of Practice on Environmental Noise Control at Concerts published by the UK Noise Council in 1995 (CoP) were assessed in the extant permission and have not been significantly altered since that approval.
- 6.7.4 The WHO provides guideline values for community noise in specific environments. For outdoor living areas, the noise guideline value for serious annoyance, daytime and evening' (07.00-23.00 hours) is 55 dBLAeqL 6hour, and for moderate annoyance, daytime and evening' 50 dh6BoLAuerqL. The level of noise outside bedrooms at night (23.00-07.00 hours) that is likely to result in sleep disturbance with the window open (outdoor values) is 45 dh8BoLuAreq, and or nighttime impulsive noise levels of 60dB LAmx. For inside, indoor living areas, the WHO noise guideline value for speech intelligibility and moderate annoyance, daytime and evenings is 35 dh6BoLuAreq. For inside bedrooms, the noise guideline value for sleep disturbance, night-time is 30 dh8BoLAuerq or 45dB LAmx. These were assessed as part of the original permission and found to be acceptable.
- 6.7.5 Acoustic conditions attached to a Premises Licence should reflect guidance provided in the Noise **Council's Code of Practice (CoP)** on Environmental Noise Control at Concerts published by the UK Noise Council in 1995 for music events,

which rely on the use of high powered amplification. The CoP is designed to assist both Local Authorities and event organisers, giving guidance on the prevention of public nuisance, setting Music Noise Levels (MNLs) for the event, and procedures for dealing with noise complaints.

- 6.7.6 The CoP states, for urban stadia or arenas where 3 concert days are proposed per calendar year measured noise levels (MNLs) should not exceed 75dB(A) over a 15 minute period.' For all venues where 4-12 concert days are proposed per calendar year, the CoP states, MNLs should not exceed the background noise level by more than 15dB(A) over a 15 minute period'.
- 6.7.7 Excessive noise or 'unwanted sound' from any premises may cause a statutory noise nuisance under Section 79(1)(g) of the Environmental Protection Act 1990. There is no set level at which a noise becomes a nuisance, but cumulative impact of occurrences over consecutive days or higher frequency would have a greater impact. For noise to be deemed a statutory nuisance, the nuisance complained of must be, or likely to become, prejudicial to people's health or wellbeing or cause unreasonable interference with a person's legitimate use and enjoyment of their home, materially impacting on comfort and amenity.
- 6.7.8 In terms of noise and disturbance a concert is different to a football match, or other MNFE. The music is continuous rather than comprising occasional roars and chants from the crowd. The sound is loud and audible outside the Stadium and may also cause vibration. The original permission in 2016 recognised this and included a cap on concerts to 6 within the total of 16 events. Subsequent applications have sought temporary removal of the cap on concerts within the 16 event cap for the years 2023 and 2024.
- 6.7.9 The sample size of music events at the Stadium to date show that these tend to take place more often in the evenings and are more likely to occur midweek than other sporting events that have been hosted at the stadium. These are also more likely to occur on consecutive days / nights. This should be considered alongside the noise limits that are set for music venues with an awareness that the impacts of such events have on an area.
- 6.7.10 The CoP states, for urban stadia or arenas where 3 concert days are proposed per calendar year MNLs 'should not exceed 75dB(A) over a 15 minute period' or all venues where 4-12 concert days are proposed per calendar year, the CoP states, MNLs 'should not exceed the background noise level by more than 15dB(A) over a 15 minute period'. In this regard the condition setting the maximum level at 75dB(A) over a 15 minute period already exceeds guidance, as 6 concerts were allowed in the original permission. The removal on concert caps through temporary permissions HGY/2023/0823 and HGY/2023/2041 meant that 7 concerts were allowed in the year 2023, at the same cap of 75dB(A) over a 15 minute period. HGY/2023/0823 and HGY/2023/2041 meant that 7 concerts were allowed in the year 2023, at the same cap of 75dB(A) over a 15 minute period.

Table 1: Extract from Code of Practice on Environmental Noise Control at Concerts, Noise Council, 1995 (COP)

| Concert Days Per Calendar Year, per venue | Venue Category | Guideline |
|---|------------------------------|---|
| 1 to 3 | Urban Stadia or Arenas | The MNL should not exceed 75dB(A) over a 15 minute period |
| 1 to 3 | Other Urban and Rural Venues | The MNL should not exceed 65dB(A) over a 15 minute period |
| 4 to 12 | All Venues | The MNL should not exceed the background noise level (1) by more than 15dB(A) over a 15 minute period |

6.7.11 Noise associated with the approved development will remain primarily from road traffic noise, external building plant, and match day and other events, as was the case with the approved hybrid permission. Chapter 13 of the Environmental Statement submitted with the hybrid approval HGY/2015/3000 recognised the impact of noise on local residents but categorised negligible to minor impact on the basis of the 6 concert and 10 other MNFEs. That application was also supported by a Noise Assessment, which was independently reviewed by LBH officers and third party environmental health professionals, Sanctum.

6.7.12 On the basis that there would be a total cap on concerts of 6, Sanctum suggested that the Council may wish to limit the noise to a 15 decibel increase over background noise for anything over the 3 concerts. However, officers were of the view that the economic benefits of the concerts meant this was not a reasonable approach particularly given that there was an existing stadium in-situ. Instead, a condition requiring a noise control plan was attached to the permission and was approved under reference HGY/2017/2565. The approved noise control plan recognised that noise break-out from MNFEs within the stadium would depend upon a number of factors such as the placement of the stage and the orientation of the loudspeaker systems in relation to that.

6.7.13 A revised Environmental Statement and Noise Assessment were submitted as part of the S.73 application relating to the changes to the hotel in Plot 3 (HGY/2023/2137) but related to the impact of the amended hotel only. This reiterated the initial assessment that windows to the proposed hotel, as with the outline permission for the residential towers on Plot 5, should normally be kept closed during events and rooms would need to be fitted with mechanical ventilation to reach WHO internal target values.

Assessment

6.7.14 The proposed amendment to condition B9 would increase the frequency of MNFEs and remove any cap on the number of concerts, within the overall proposed limit of 30 the greater number of events, the worse the cumulative impact will be.

- 6.7.15 The Environmental Statement Compliance Note submitted with the application notes that noise impacts would not be significantly beyond the 2015 ES conclusion. That statement references that although there would be direct and permanent effects at the receptors as a result of stadium noise, these would remain negligible to minor.
- 6.7.16 Regular noise monitoring is currently undertaken during each MNFE at agreed sensitive receptor locations to ensure that the predicted noise levels are not exceeded. Since the Stadium opened it has been found that the acoustic design has performed better than anticipated. LBH Environmental Services officers have been involved in event monitoring and assessments since the stadium opened. Some of these results are detailed within the comparison between concerts and non-concert MNFEs in **Appendix 4**. These show that events do successfully retain sound inside the stadium bowl and the 75d/b limit as set by condition B10 (formally B17) are not exceeded.
- 6.7.17 **Appendix 4** provides detail of the number of noise complaints from the 17 MNFEs monitored in 2022 and 2023. These average at 0.8 noise complaints per concert and no noise complaints for non-concerts. The level of complaints is not an exact indicator that there is no noise impact, as residents are aware of the potential for 6 music events and that this is an accepted position but does further support that the sound retention has been broadly successful. There have been 50 objections received to the potential increase, of which noise has been cited as a concern, but these tend to focus on the increased number of events rather than specific noise issues from music events.
- 6.7.18 LBH officers have confirmed that the monitoring presented by the applicant is better than anticipated and the maximum of 69dB(A) recorded in the monitoring locations close to the stadium are well within the existing 75dB(a) limit. However, LBH officers have reported that on occasion there have been noise complaints further away from the stadium, as far as Bruce Grove. This is an area that was not anticipated to have significant noise impact from events given the distance between the Stadium and these residents. It is assumed that this is as a result of the Stadium design which creates a cylindrical noise dispersal, meaning these further points also face nuisance. Further monitoring of these areas is recommended for future events and a review of Condition B10 will require those additional monitoring stations to be agreed.
- 6.7.19 The existing condition B10 limitation of 75dB(A) was on the basis of only 6 music events a year and LBH officers consider it reasonable that this cap be retained for 16 concerts on the basis that this level of noise is considered acceptable. However, the greater frequency of events is considered likely to have a significant cumulative impact so the applicant will be required to demonstrate how this impact will be mitigated to minimise / prevent noise and nuisance. Accordingly, the applicant will be required to submit a noise management plan (NMP) for each MNFE, which should include details of all external monitoring locations, noise criteria and the

noise control management procedure. Post event meetings will assess any issue of complaints raised and how performance can be improved for future events. Noise issues will be part of the review mechanism for the events and complaints and mitigation measures will form part of that assessment.

6.7.20 As well as the addition NMPs, monitoring and post-event meetings, the amended condition B10 limits the noise impact of the additional music events. The Councils Noise and Nuisance Team have advised that the noise generated from 16no. music concerts must not exceed 75dB LAeq; any additional concerts above 16no. shall not exceed 70dB over a 15 minute period and all other MNFE's shall be limited to 65dB LAeq, over a 15 minute period.

6.7.21 Part of the review mechanism and addressing resident concerns will be through the complaint's procedure. Residents can register complaints through a dedicated hot line to the Club, as well as directly to LBH. The Blue Book and THFC events webpage provide details of how to make such representations.

6.7.22 As with the approved hotel and outline permission for the residential blocks, emerging developments approved since the approved Environmental Statement would have been designed mindful of the noise issues associated with the existing stadium and knowing that there would be concerts and other MNFEs as well as football. Those developments would fall under the 'agent of change' consideration, in that the stadium should not have unreasonable restrictions placed on it as a result of development permitted after it was established.

6.7.23 Overall, the proposed amendment to frequency and concentration of events is not considered to materially affect the noise and vibration conclusions of the approved hybrid permission. Therefore, the findings of the 2015 Environmental Statement are considered to remain valid and applicable. Any impact would be assessed through the rigorous monitoring and review mechanism, which could result in further restrictions or lowering of the cap if issues are not reasonably mitigated.

6.7.24 The ongoing impact of noise and disturbance from events has been considered in detail by LBH officers through monitoring and review of processes and through the LAMP. The review mechanism of the increased quantum and frequency are considered to provide sufficient assurance that such issues can be assessed and attenuated if required. On that basis, the impact of noise and disturbance is considered to be acceptable.

6.8 Impact on Amenity of Adjoining Occupiers

6.8.1 Policy DM1 of the Councils Development Management Development Plan Document (DM DPD) states that development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that address issues of vibration, noise, fumes,

odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.

- 6.8.2 London Plan Policy HC6 considers management of the night-time economy. This notes that the night-time economy refers to all economic activity taking place between the hours of 6pm and 6am and includes evening uses. As well as clarifying that managing issues such as transport, servicing, increased noise, crime, anti-social behaviour, perceptions of safety, the quality of the street environment, and the potential negative effects on the health and wellbeing of Londoners, will require specific approaches tailored to the night time environment, activities and related behaviour.
- 6.8.3 The impacts on amenity to neighbouring properties are predominantly impacted by noise impact from the events, as assessed above. However, the additional impact of increased noise not only from the stadium but from the increased pedestrian movements is also a concern. This is particularly relevant to night-time activities. Disruption is not limited to night-time though and impact on day to day life from the events over weekends is also a relevant concern.

Nuisance and anti-social behaviour

- 6.8.4 Significant public consultation responses to this proposal have highlighted antisocial behaviour associated with all Major Events at the stadium. Regulatory and Enforcement services are crucial for ensuring a safe environment for both residents, business/traders and those attending events at the new stadium. The main areas of concern relate to regulating and controlling the main locations attendees arrive and enter the stadium. Concerns in these locations regard illegal vendors, ticket-touts and illegal street trading. This impact on the safety, fair trading (due to potential unregulated goods) or impeding the flow of those arriving and departing an event.
- 6.8.5 There are also other issues surrounding ASB and Public Nuisance in the form of noise arriving and departing the venue, urination, broken glass (before cleaning) and drunkenness. There is also the issue of Community Safety, namely the use of CCTV to monitor issues of safety and welfare from those that might queue early for big acts.
- 6.8.6 The draft LAMP has also sought to address this requirement to improve toilet provision, on-street signage and improved advertisement of toilet siting online, as well as stewarding and marshalling of these areas. Reviews of 'wet spots' and anecdotal accounts also influence these reviews and help dictate where to focus efforts
- 6.8.7 Increasing the number of MNFEs will require additional resources in the form of 9 officers for larger events larger events, 6 of which would be working between 1pm till 23.30. The cost of enforcing these additional events is estimated as £4,000 per

event. Regulatory Services will therefore require mitigation in the form of a revised management and monitoring strategy to be included in the new LAMP to deal with this issue and for adequate resources to be secured as part of this planning permission to deal with these issues.

- 6.8.8 Overall, the management of these issues is considered to be improving and will continue to be reviewed. It is accepted that there will always be some level of undesirable behaviour associated with large scale events but the systems and review mechanisms in place are considered to be sufficient for additional events without significant impact on the surrounding character. The intensification of use and concentration of events will be reviewed as part of the review mechanism agreed which includes a focus on monitoring these issues.

Litter and street cleaning

- 6.8.9 Issues of litter from Football and other MNFEs have been cited as objections in numerous public consultation comments.
- 6.8.10 As with all event day activity, this is largely covered by the LAMP and associated monitoring and review. There is a specific differentiation between Football Event and MNFEs, with football cleansing being undertaken by private contractors to the Club and MNFEs being subject to LBH Cleansing, at the Club's expense. LBH officers have expressed a desire that their contractors continue to undertake street cleaning for MNFEs, as this is considered to have had better results and wider coverage than when performed by the Club's contractor. This arrangement is anticipated to continue in the latest draft LAMP.

Concerts / non-concerts

- 6.8.11 The sample size of music events show that concerts tend to be more in the evenings and are more likely to occur midweek than the other sporting events that have been hosted at the stadium. As well as the in-stadium noise impacts there is also the dispersal impacts of large numbers of people leaving the stadium after the event and the impact on adjacent residential properties from noise and disturbance.
- 6.8.12 The event capacity for the Stadium is currently capped for concerts by the layout of the stadium and these tend to be less than for sporting events, at approximately 45,000 people. The licensing restrictions also mean that any event that goes beyond 22:00 would require a specific late night license. In these regards the finish times of the midweek events are comparable with the disruption from midweek football matches. Retention techniques also aim to stagger the exit time of attendees and help mitigate crowding around transport hubs. Monitoring reports for the recent review of the LAMP have clarified that these stadium retention methods have been broadly effective, but further work is required for MNFEs and will form part of the monitoring of a bespoke MNFE Travel Plan. The draft LAMP

revisions also reference methods such as improved signage and stewards located along the main walking routes and these stewards aim to discourage attendees from deviating from main roads. It is also noted that midweek or evening events mean there is more likelihood of some weekend respite for the local community.

6.8.13 On balance it is considered that the amenity impact from concerts over MNFEs is not significant in this regard, but the review mechanism of quantum and concentration of events is required.

6.9 Transportation and Parking

6.9.1 The NPPF (Para. 110) makes clear that in assessing applications, decision makers should ensure that appropriate opportunities to promote sustainable transport modes have been taken up.

6.9.2 London Plan Policy T1 sets a strategic target of 80% of all trips in London to be by foot, cycle, or public transport by 2041 and requires all development to make the most effective use of land. Policy T5 encourages cycling and sets out cycle parking standards and Policies T6 and T6.1 to T6.5 set out car parking standards.

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

6.9.4 Policy SP7 of the Local Plan states that the Council aims to tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety by promoting public transport, walking, and cycling and seeking to locate major trip generating developments in locations with good access to public transport. This approach is continued in Policies DM31 and DM32 of the DM DPD.

6.9.5 A key principle of the Tottenham AAP was to create high quality, publicly accessible and activated spaces within the site on non-match days that complement other public realm / spaces in the area and link with key existing and future walking and cycling routes in the locality and improved permeability across the site, linking High Road West and Northumberland Park regeneration areas.

Transport Assessment

6.9.6 The Planning Statement and Environmental Statement Compliance Note submitted in support of the application provide details of the changes since the earlier consents, and also references updated transportation policy changes 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.

- 6.9.7 Improvements in transport referenced in the Planning Statement were referenced in the 2016 application as anticipated so would not create a significantly improved transport setting to justify the increase in isolation. It is also noted that there has been delivery of new build developments, especially around Tottenham Hale and Seven Sisters. Further new developments have been approved in the vicinity as well, such as the High Road West development immediately adjacent to the stadium site. It is also unclear what impact the post-Covid working patterns have had on transport capacity.
- 6.9.8 Although no Transport Assessment has been submitted with this application, there have been regular monitoring of events and independent Transport Plans provided for events and ongoing discourse between stakeholders. These issues have been reviewed by officers and considered in this assessment, alongside comments raised in BCLG meetings and as a result of the public consultation undertaken for this application.
- 6.9.9 The application has been reviewed by LBH Transport officers in conjunction with a review of the latest LAMP. This has considered the baseline (existing events and operation) current public transport capacity and ability to cope with the additional events. Further review of the existing mitigation secured by the S,106 legal agreement and performance in relation to the current approved events and monitoring proposal document. The assessment also considers impacts on the transport network from future events and recommends changes to the existing S.106 obligations to help mitigate the impacts of the additional events.
- 6.9.10 Annual monitoring of events has taken place in accordance with Schedule 19 of the S106, but there have not been specific Travel Plans created to review the target modal splits for MNFEs. Specific bespoke Travel Plans for these events have been requested by LBH Transport officers to better review and improve performance. This will be fed into the Major Event Day LAMPs and monitoring.

Extant permission

- 6.9.11 There have been eleven different types of MNFEs in the Stadium since it was developed, as shown in **Appendix 4** (appendix 8 of that document). There have been several variations in relation to the availability of public transport service due to Industrial action and planned engineering works which has resulted in the closure of White Hart Lane Station or Northumberland Park Station. This has resulted in changes in the demand forecast which has been fed into the travel demand management and Local Area Management Plan (LAMP) which was informed and supported by a Bespoke Transport Plan. In each event ranging from 45,000-50,632 spectators were able to access and leave the local area using the available capacity on the local transport network, with the support of additional

mitigation measures, such as shuttle bus service to Liverpool Street station as a contingency.

6.9.12 The management of the capacity on the local transport network is addressed by a number of S.106 obligations attached to the original planning permission HGY/2015/3000 and are listed below:

- 1) Attraction of Visitors and retention measure to encourage spectators to arrive early and stay later at the stadium.
- 2) Bus Priority and Diversion Measures, including the termination of the W3 bus route and the east bus diversion route.
- 3) Modal Split around concerts and non-football events: concert modal split a target of 90% of all spectators attending a concert at the completed stadium shall use modes of transport other than private car to arrive within the vicinity of the completed stadium.
- 4) Major Event Day Local Area Management Plan (Schedule 18): requires a Plan to mitigate adverse environmental impacts and nuisance to residents and business to cover a geographical area. The area is to be agreed with the Council in consultation with the Local Ward Councillors, the BCLG, TfL and the Metropolitan Police in accordance with the framework set out in Schedule Eighteen.
- 5) Major Event Day Control Parking Zone- Design consultation, Extension, and Monitoring, including changes to the existing CPZ operational hours (paid for by Owner).
- 6) Major Event Day Monitoring programme, Major Event Day Review, a monitoring programme in respect of the Major event day Stadium Development Travel Plan.
- 7) Major Event Day Stadium Travel Plan, to manage the modal split of the stadium.
- 8) Transport and communication strategy, the strategy for communicating the agreed measures in the Major Event Day Development Travel Plan to spectators and the local community.

6.9.13 These obligations will be retained within the proposed increase of events and should ensure that the sustainable transport methods remain at the forefront of any events.

Disruption through Major Events

6.9.14 The main impact from events at the Stadium relate to the road closures, lengthy walking and driving diversions, increased queuing at stations, parking issues, taxis and chauffeurs idling, lack of knowledge and authority from stewards, parking enforcement from LBH. **Appendix 4** (appendices 8) provides details of events since March 2019 and shows the High Road closure times generally requiring around 5 hours for rugby; 6.5-7 hours for concerts; 5.5 hours for boxing; and NFL up to 12 hours.

6.9.15 The Local Area Management Plan obligation contained within the S106 has been in practice since 2019, was designed to limit the impact on local residents and businesses on event days, as well as managing movements to and from the Stadium. This is a 'live' document that is under review by officers in conjunction with relevant stakeholders. These issues have all be raised as concerns within the recent discussions of BCLG and other stakeholders and seeks to ensure that such impacts are mitigated.

6.9.16 LBH Transportation have clarified that the existing arrangements are working satisfactorily but can be better refined through the LAMP. The continued meetings of BCLG will provide a pathway that such issues can be addressed and mitigated. However, regardless of how well these are mitigated there will inevitably be a level of disruption experienced by residents through stadium events. The greater the number and frequency of events, the greater the impact on the local community. Such impact of consecutive days of road closures and associated impact on public transport, road network and day to day life of residents remains relatively untested at the level proposed. In this regard the review mechanisms and associated further monitoring will help inform what level of events will be acceptable for the area. It is essential that these are monitored and impacts reviewed and that BCLG members and general public have the opportunity to raise concerns regarding any greater concentration of events. There is a direct line between residents to the Club if there are any complaints and these can also be logged to LBH directly.

Trip generation and Public Transport improvements

6.9.17 Public Transport capacity and arrival and departure information show that there is sufficient capacity on the network to cater for the additional events at the stadium, this has been successfully demonstrated by the number of MNFEs held at the stadium to date. These events have had to be held with varying levels of public transport capacity available due to closure of various local stations from engineering works and industrial actions. Even in those adverse occurrences the transport impact has been successfully managed.

6.9.18 The increase in the number of events will result in additional demand on the local area which will require mitigation. Whilst the current S.106 agreement provides some mitigation, additional measures will be required due to the number of events and the nature of the events and the demand on local infrastructure.

6.9.19 Mitigation will be required in the following areas:

Major Event Day Stadium Development Travel Plan

6.9.20 There is currently no MNFE Travel Plan for events at the new stadium. The applicant will be required to submit a Bespoke non-football Event Day Travel Plan covering all non-football Major Events at the stadium. The Travel Plans must be

monitored annually to achieve the agreed modal split targets for non-football events with a maximum car mode share of 10%.

- 6.9.21 Schedule Four of the S.106 legal agreement should be revised to reflect the new obligation including a Travel Plan monitoring fee of £30,000 per year for the monitoring of the non-football event Day Travel Plan and Local Area Management plan for a minimum period of 5 years.

Parking Management

- 6.9.22 The independent monitoring report has concluded that the actual mode share for football is higher than the approved 23% car mode share, which is referenced in the Planning Statement. However, the car mode share for MNFEs has a significantly lower target of only 10% car mode share, as detailed in the S106 agreement. The applicant has not met this target and data collected needs to be compiled for more events. These will be required as part of the monitoring through the MNFE Travel Plan.

- 6.9.23 The higher mode share of car travel has resulted in a greater amount of street parking, with surveys on event days indicating an increase in on-street parking in most controlled parking zones. LBH Transportation have stated that although there is a clear issue of undesirable car use, this is still described as 'moderate' with 276 additional vehicles parked in 54% of the CPZ surveyed areas.

- 6.9.24 In addition to the review of the Event Day Control Parking Zone, there are a number of locations which have been identified as requiring additional parking management measures, especially around an emergency corridor. LBH Transportation have suggested that the implementation of a "Red Route" be used to help mitigate this issue. The red route would involve using camera enforcement to assist in keeping the emergency corridor clear and to enable safe egress of the stadium particularly along White Hart Lane, where two new cameras are expected to be required and a contribution has been requested to cover this implementation. Other roads such as Creighton Road, Northumberland Park, Shelbourne Road, Leaside Road, Bull Lane / Queens Street, Lordship Lane, High Road North to the borough boundary with Enfield, and the High Road south junction Lordship Lane to the junction with Bruce Grove are also expected to form part of this red route.

- 6.9.25 Overall, the impact on parking management of the additional events is considered to be acceptable, subject to the proposed S106 obligations, which will help existing parking management enforcement not only for the additional events but also the existing ones.

Comparison of concerts to non-concert MNFEs

- 6.9.26 As detailed in the Noise section of this report, the sample size of music events at the Stadium to date show that these tend to take place more often in the evenings

and are more likely to occur midweek than other sporting events that have been hosted at the stadium. These are also more likely to occur on consecutive days / nights as shown in the illustrative calendar in **Appendix 4** (Appendix 6 of that document) including 30 events. Therefore, it is reasonable to conclude that concerts have different characteristics and impact to sporting events throughout a day at the weekend.

6.9.27 In terms of specific transport impacts, all concerts whether midweek or at weekend require shorter road closures than NFL events but longer than other sporting events. Characteristic for midweek, evening concerts have potential for conflict with transport hubs and people returning from work, as well as attendees arriving and leaving in batches before and after the event. Measures for early attraction and retention of attendees and mode shares for these events should be closely monitored to ensure that these are successfully managed. This will ensure the different characteristics in transportation measures are suitably attenuated.

6.9.28 LBH Transportation officers have reviewed the current submission and raised no concerns regarding the principle of concerts over non-concerts but emphasised a requirement for bespoke Travel Plan for MNFEs so that such behaviour and monitoring can provide enhanced services. This will form part of the S106 obligations and monitoring review.

Cycling

6.9.29 The S106 seeks a modal share of 1% of attendees travel for all Major Events at the stadium. The S106 required a Cycle Strategy to identify means of achieving and exceeding this modal target, highlighting that specific event management may identify additional measures. No specific cycle strategy has been approved, although these do form part of the individual LAMPs. LBH Transportation have reiterated that the cycle strategy should be submitted and that cycle measures continue to be reviewed to address this modal target. This will be part of subsequent LAMP and Travel Plan reviews.

6.9.30 The existing cycle strategy indicates that on Major Event days, temporary secure, covered cycle parking is provided in convenient locations in close proximity to the stadium, as well as permanent on-street cycle parking options available. Detail of cycling facilities are available on the website, where assurances are also provided regarding entering the stadium with cycling accessories (helmets etc.) without having to check them in, unlike other bags.

6.9.31 Recent LAMP discussions have acknowledged that Major Events are not achieving this target and how this might be addressed. It is also acknowledged that the level of secure cycling provided does not meet a 1% share and that this will need to be increased as the modal share increases. This will be reviewed further through LAMP and Travel Plan review.

6.9.32 Public consultation comments also reference closure of the Cycle Superhighway on matchdays. The applicant has responded that this is a partial closure around Tottenham Hale only, to accommodate safe queuing for the station, rather than a complete closure and that the Cycle Superhighway is otherwise unaffected.

6.9.33 The level of cycling provision is under constant review for all events and is expected to be significantly changed through use of rental bikes, such as Lime bikes. This is an issue for all events and whilst there is a need to achieve this modal target, this would not be sufficient reason to justify refusal of an increase in the number or type of events. The proposed review mechanism would also allow for further review and monitoring of this.

Coach Strategy

6.9.34 There is an existing S106 obligation relating to the Coach Strategy, but this this will require a revision to maximise the number of spectators by coach for MNFEs and reduce the car mode share. This is especially relevant to boxing events which had a 24.1% car mode share. This should form part of the bespoke Travel Plan.

Major Event Day Local Area Management Plan (LAMP)

6.9.35 The Pedestrian Walking routes attached in Annex 1 of the S.106 legal agreement, will require updating to reflect the changes since the original drafting of that document. Since the opening of the stadium shuttle bus locations and additional routes have been identified which will need to be revised in the Annex. The revised walking routes will assist in determining the extent of the cleansing and monitoring required to ensure the cleansing element of the LAMP mitigate the impacts of the additional events.

6.9.36 The LAMP must be revised to reflect the impacts of the additional events on the Council's Regulatory Services. Therefore Council's Regulatory Services require mitigation in the form of a revised management and monitoring strategy to be included in the new LAMP to deal with this issue and for adequate resources to be secured as part of the revised LAMP and of this planning permission to deal with these issues – a financial contribution has been secured as part of the s.106 legal agreement.

Cumulative impacts

6.9.37 Responses received from the public consultation have flagged changes around the site since the original approval in 2016. These include additional residential developments within the vicinity, especially around key hubs such as Tottenham Hale and Seven Sisters, as well as the approved development of High Road West. These have been flagged in discussion with TfL and LBH Transportation officers but these developments have been deemed not to have had a significant impact on potential crowd flows and use of these stations.

6.9.38 TfL comments have highlighted there will be a requirement for additional staffing for the MNFEs for queue management and associated operations. However, the applicant has advised that such resourcing should come from their own budget and any increase in users will correspond with associated expenditure. The applicant has referred to the GLA letter of support as an indication that the obligation from TfL is not supported at a strategic level.

Transport Conclusions

6.9.39 Overall, it is accepted that the events at the Stadium have been successfully managed but further work will be required to mitigate future events, especially with the extent of MNFEs. These will be covered by existing and proposed conditions and S106 obligations.

6.10 Safety and Crime

6.10.1 London Plan Policies D11 relates to 'Safety, Security and Resilience to Emergency' and links design out crime and counter terrorism prevention measures, as well as acknowledging fire safety issues. This considers the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime.

6.10.2 The Metropolitan Police have stated that they have been involved with discussions surround the extra events and reviewed internally. The significant increase in events is noted but they consider the most appropriate forum is through Licensing rather than Planning.

6.10.3 The existing permission requires that all significant MNFEs are monitored and reviewed by Safety Advisory Group (SAG) and Sports Ground Safety Authority (SGSA) and any concerns regarding staffing numbers, siting of relevant officers and detailed review are open to review as part of those ongoing reviews. The LAMP also provides an overview of required emergency service arrangements. These safety reviews are considered sufficient for the additional events.

6.11 Equalities

6.11.1 In determining this planning application, the Council is required to have regard to its obligations under equalities legislation including obligations under the Equality Act 2010. In carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful discrimination, and secondly to the need to promote equality of opportunity and to foster good relations between persons who share a protected characteristic and persons who do not share it. Members must have regard to these duties in taking a decision on this application.

6.11.2 As noted in the various sections in this report, the proposed scheme would provide a range of socio-economic and regeneration outcomes for the Tottenham area including the now built stadium and Tottenham Experience. The wider regeneration benefits proposed to be delivered by 2028 would also have significant public benefits. The applicant has highlighted existing arrangements with local faith groups who are disrupted by events and road closures from events at the Stadium and acknowledges that such impact will continue to be mitigated through the LAMP.

6.12 Conclusion

6.12.1 The proposed amendments will further enable the delivery of prestigious events at the stadium and associated regeneration, as desired by the site allocations. This regeneration will continue to provide socio-economic improvements in the area, which included two of the most deprived wards in London prior to the original permission.

6.12.2 The intensification of the increase in events is considered to be insufficiently tested to date and the impact on the local community requires further assessment and review. In this regard the review mechanism for the increase in events is welcomed.

6.12.3 Overall, it is considered that the socio-economic benefits from hosting additional events, encouraging more people to the area will have a positive socio-economic benefit. The community fund will enable some improvements to the area and further benefits to the community. The free tickets and 24-hour advanced booking system will ensure that there is more local involvement in events at the stadium, which not only benefit the interaction between the stadium and community, but also have benefits in reducing travel to the stadium.

6.12.4 Noise within the stadium has been better contained than was assumed in the original hybrid permission. The noise levels for all Major Events have been below the condition limit and in this regard the impact from noise is considered acceptable. A revised noise management Plan (condition B10) is recommended to have further monitoring and a lower music limit for the additional proposed MNFE's. The intensification of events and cumulative impact of consecutive events will need to be further monitored and assessed. In this regard the review mechanism and further monitoring of events is welcomed.

6.12.5 Transport impacts have been reviewed through regular monitoring and continue to be reviewed in the latest draft amendment of the LAMP. The requirement for further bespoke Travel Plan and monitoring will help address concerns over high car use for certain MNFEs and is welcomed.

6.12.6 The amenity impacts from ASB, noise impacts outside the venue and associated litter and cleaning up of the area for MNFEs are considered to have been

satisfactorily addressed and will continue to be reviewed and monitored through existing obligations.

6.12.7 Subject to the recommended planning conditions and s106 planning obligations to secure necessary mitigation and policy objectives, officers consider that the proposed scheme is acceptable on its own merits, when considered against the development plan and all other material considerations.

7 COMMUNITY INFRASTRUCTURE LEVY (CIL)

7.1 There is no change in floorspace and therefore no change in CIL from the extant permission.

8 RECOMMENDATIONS

8.1 GRANT planning permission for the reasons set out in Section 2 above.