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## **Tottenham Hotspurs Stadium – Extra Events**

### **Overview**

In response to TfL request for funding of LU and LO staff for additional events, Quod's letter of 23<sup>rd</sup> July 2024, explains why the TfL request does not meet the relevant tests for planning obligations. It raises four points:

1. No adverse transport impact/ insufficient capacity – major events already permitted at the stadium do adversely affect the transport network and existing passengers; TfL successfully manages this impact by resourcing extra staff on event days. TfL's request for additional funding is to deal with further additional impacts, to assist with increased footfall from stadium visitors and to ensure any potential adverse effects on stations do not occur.
2. There is no correlation between the fixed contribution being sought and the number of events taking place and therefore staffing requirements - this is addressed below in more detail.
3. Farebox – it is assumed that about the farebox revenue would be more evenly distributed throughout the year and help create a more even pattern of staffing requirements. This is also flawed and is considered below. .
4. TfL did not seek contributions for funding with the original application and refers to TfL current financial position not being relevant to planning. The funding requested is based on TfL's assessment of the development impact on the transport network of additional events including cumulative impact - Policy T4 C and E. The package of mitigation secured with the original NDP proposal considered the transport impacts assessed and the maximum number of non-football major events proposed (10 major and 6 concerts with a maximum capacity of 55,000 persons). This is considered below along with points 1 and 2.

The principle that TfL can secure section 106 funding for new or additional major events from venues throughout London has already been established at various venues. TfL secured or agreed mitigation for the ABBA Arena at Pudding Mill Lane, Madison Square Gardens (subsequently refused) in Stratford, and at Wimbledon (Tennis – forthcoming Mayoral hearing).

### **Development, Site Description and Transport Context**

The application is for a minor material amendment under Section 73 of the Town and Country Planning Act for the variation to Condition B9 (Major Non-association Football Events) of the hybrid planning permission HGY/2023/2137 (as amended) for amendments to allow up to 30 major non-association football events including music concerts, and other associated changes. This compares to 16 currently permitted, so an additional 14 major events per year.

The site is located close to the A1010 High Road, which forms part of the Strategic Road Network (SRN). The A10 Bruce Grove / A1010 High Road junction and the A406 North Circular Road / A1010 Fore Street junction are approximately 1km to the south and 1.4km north respectively and are the nearest points of vehicular access to the Transport for London Road Network (TLRN) from the site.

White Hart Lane station (London Overground and Greater Anglia services) is located 500 metres to the north-west of the site, and Bruce Grove station, is 900 metres south. Northumberland Park station (National Rail services) is located 800 metres to the east.

The nearest parts of the London Underground network are accessible by train or bus at Seven Sisters station (Victoria Line and London Overground) which is over 2km south, and Tottenham Hale (Victoria Line), which is 2.3km to south west.

The nearest bus stops to the site are located along the High Road served by 149, 259, 279, 349, and N279, other bus routes can be access at Northumberland Park (341, 476, W3). The site has a Public Transport Accessibility Level (PTAL) of 5, where 0 is the least accessible, and 6b the most accessible.

### **Public Transport Improvements**

There have been several transport improvements since 2015, which TfL acknowledges, this has been primarily funded to support regeneration and growth in the local area, including the stadium and its masterplan, major housing proposal, as well as development in the wider Upper Lea Valley. Some of the growth has come forward, some under construction and much in the planning pipeline (committed development and allocated sites).

Northumberland Park station was upgraded in 2017, as part of the wider improvement to rail capacity between Stratford and Angel Road, including a third track. Angel Road Station was replaced by a new station called Meridian Water in May 2019, which is located closer to the stadium. Phase 1 of Meridian Water is only beginning to be occupied. It is worth noting that major events at the Drumsheds are restricted due to potential conflict with events at the Stadium.

TfL completed improvements to White Hart Lane Station in August 2019, creating step free access from street to platform for the first time, in addition to a better access via a new station forecourt on Love Lane and towards the High Road. They have improved access from the stadium and wider masterplan including sites close to the station and within wider corridor such as High Street West.

At Tottenham Hale, TfL altered access and built a new bus station, and upgraded the taxi rank. TfL created new landmark entrance to the station, enlarged and integrated station concourse to reduce crowding and queuing. Network Rail created step-free access to National Rail platforms via two new lifts and a bridge. TfL replaced the existing lift to the Tube to create step-free access from street to train. These works were completed in November 2022. Plots in the wider masterplan plan are being developed.

Haringey Council has also introduced improvements to public realm on White Hart Lane and around Northumberland Park.

Tottenham Hotspur's Stadium Local Area Management Plan (LAMP) has been introduced as part of the stadium planning permission. This has been in practice since 2019, and subject to refinement. This has been designed to limit impact on residents and businesses; when there are event days, as well as to manage flows to and from the stadium.

TfL and other transport operators have invested in the transport network. TfL's request for funding relates to what we need to cater for further major non-football events, noting that it already absorbs the cost of current events. TfL's advice set out below is that extra events generate impacts that require funding for staff. TfL requests that either that the planning condition restricting number of events remains, or if the Council decides to allow more major events that extra funding for staffing is required for both LO and LU.

The transport network is put under strain when events are hosted at the Stadium. The experience of a recent non-football event (the Travis Scott concert on 11th July) showed loadings on the network well in excess of capacity before and after the event concerned. It is therefore reasonable to request mitigation for this as the strain exerted would not be present without the event. This is particularly the case where non-football events are concerned, with event attendees who may be making an ad hoc trip, are less familiar with the transport connections available and are therefore more likely to rely on the most obvious routes to access the stadium e.g. via White Hart Lane station. This puts more pressure on specific routes with mitigations being required from staff to help manage queuing and to direct unfamiliar customers to alternative routing options to minimise crowding levels and customer journey times. Additional events do generate extra staff and resource requirements as each event requires a significant resource on the ground to manage customer flows.

### **Impact of extra events on transport network and mitigation required**

Planning conditions have already been imposed to restrict the number of non-football and concert events per year to mitigate adverse impacts on the local area and on the transport network. Neither the original TA in 2015 or the current application consider the cumulative effect of additional non-football events. TfL has considered this aspect in our response, and identified this as transport impact that needs addressing, and has proposed mitigation that is considered necessary and reasonable. There is no dispute that major events at the stadium can be accommodated on the transport network. However, the acute impact of increased number per year at local stations is a major concern for TfL.

LU uses Special Requirements Team (SRT) for certain major events such as football matches to complement other background station staff, and when the number (and regularity) of such events increases, then the ability of this team to mitigate the impact is reduced.

Additional LU station staff for Tottenham Hotspur Stadium events are supported by LU Special Requirements Team (SRT) resources, reflecting the infrequent occurrence for station design and the management requirements overlay for Tottenham Hotspur Stadium events and to be in line with the station Congestion Control and Emergency Plan (CCEP). Existing station staff are required to make the station operate safely, including regular security checks, and to escort disabled people between platforms and entrances.

As stated in the planning statement: during major events, the Stadium is served by four stations (White Hart Lane (LO), Northumberland Park (NR), Tottenham Hale (LU + NR) and Seven Sisters (LU+LO)) with shuttle bus services connecting a further two (Wood Green (LU) and Alexandra Palace (NR) stations).

Certain local roads (including the High Road) are closed for a period prior and bus routes are diverted. This can cause delay to local buses (and inconvenience for passengers), and it takes time for the bus network to recover from each closure. Crowds exiting and queuing around all the stations can also impact on bus operations and existing customers accessing our services.

For LU to process customers through the station in the most expedient and safe manner and to prevent congestion around the escalators, Underground Ticketing System (UTS) gates are

routinely left open during events, therefore somewhat negating any additional revenue (more about farebox later).

Both LU and LO need to deploy extra staff at their station when there are major events (non-football and football). The cumulative effect on existing operations, existing major events and with additional events at the stadium means that it may not be possible with current staffing levels to cover all the proposed future events, TfL is seeking funding to mitigate that risk. TfL will make practicable measures to staff these additional events. However, without funding that is less likely, and the potential for more adverse effects meaning the increased risk that we will not be able to stop trains at some or all of the stations and transport operators may need to restrict access to the stations, which could affect the popularity and experience for visitors to the Stadium as well as other “background” users.

LU and LO aim to be cost neutral whilst ensuring that sufficient staffing levels are available for every event at the stadium. Currently, it is not always possible to cover existing events on overtime or altered working let alone, these additional events make reaching appropriate staffing less easy.

To increase from 16 to 30 major events at Tottenham Hotspur Stadium would require a more regulated pattern of staffing, and less reliance on SRT. To establish that, TfL has requested for LU services additional eight staff plus supervisor, £675,000 per annum contribution being sought by TfL (for least 10 years).

Arriva Rail London (London Overground); in order to safely manage crowds on the London Overground network during THFC Stadium events, ARL incurs additional costs of £9,290.30 per event. TfL are asking for this amount of funding for every THFC Stadium non-football event above the original 16 non-football events. This request would be indefinite (or for as long as the licence is agreed for the 30 x non-football stadium events) as we would be incurring these costs for the life of the stadium.

Policy T4 of the London Plan (Assessment and mitigating transport impacts) states that, where appropriate, mitigation will be required to address adverse transport impacts (criteria c). To emphasise, we already provide extra staff on the LO and LU for major events at the Stadium to manage demand in line with requirements. Without additional funding as requested we will not be able to do that for any additional major events, whereas with secure funding package we could.

### **Farebox**

The assumption that TfL’s additional costs could be met by the farebox is flawed for the following reasons:

1. It mis-understands the context of fares and how the finances of TfL, as an integrated transport authority, operate. Fares revenue is used to cover the general operation of the transport system at the network level. Fares income does not cover the full costs of running, maintaining/renewing or investing in the system.
2. Revenue cannot be broken down or ring-fenced to a particular station – that is not how an integrated transport system works. Fares income is a complex result across the network of the many different journeys passengers make in the course of a day. Many of the journeys will be on travelcards or in the context of a daily cap or could be concessionary fares, and we have the added issue that we need to keep gate lines open for major events, compromising revenue protection.

3. While more people overall on the system generate more fares they also generate more costs and operational, maintenance challenges – extra development cause impacts on the system that need to be mitigated.

In this context it is impossible to argue that any additional revenue could be used in such a way. That is not a mitigation for the impacts and does not provide a mechanism to mitigate the impacts or safely operate stations in the context of the very specific and additional demands that will be placed on it by the development by additional major events.

### **Summary**

To conclude, a contribution towards additional staff to manage further additional non-football events is necessary to make the development acceptable in planning terms because, event day demand will have an adverse impact on the transport network. The nature of demand (additional footfall and crowding) arises directly from the development, and the amount requested is fairly and reasonably related in scale and kind to the development.

Notwithstanding the above, we will wish to openly discuss payments and review mechanism to help ensure there are sufficient staffing resources to safely and effectively manage additional major events at the stadium. We would want to ensure that there is a positive experience for visitors to the Stadium, and for background users, and the continued success of the development, and the capacity and safety of the transport network will be a crucial part of this overall experience.