

**REPORT FOR CONSIDERATION AT PLANNING SUB-COMMITTEE****1. APPLICATION DETAILS****Reference Nos:**

HGY/2015/3000 (Main Planning Application)  
HGY/2015/3001 (Listed Building Application)  
HGY/2015/3002 (Temp Construction Compound)

**Ward:** Northumberland Park**Addresses:**

Tottenham Hotspur Stadium, 748 High Road N17 0AP (HGY/2015/3000)  
Warmington House, 744 High Road, N17 0AP (HGY/2015/3001)  
44 White Hart Lane, N17 8DP (HGY/2015/3002)

**Applicant:** Tottenham Hotspur Property Company Ltd**Ownership:** Private**Case Officer Contact:** Emma Williamson**Date received:** 18/09/2015**Additional information received:** 11/11/2015**Drawing number of plans and documents:**

See Appendix 1

**2. Overview**

- 2.1 Tottenham Hotspur Property Company Limited was granted planning permission by Haringey Council in 2011 for the redevelopment of White Hart Lane Stadium and the surrounding land. The project is known as the Northumberland Development Project (NDP) scheme. Phase 1 of the NDP scheme has been completed and comprises a Sainsbury's superstore on Northumberland Park Avenue and Lilywhite House which is home to Tottenham University Technical College and the club's offices. The land to the north of Paxton Road has now been cleared of buildings and work is currently underway on the stadium phase of the consented NDP scheme. Paxton Road has now been Stopped Up and closed.
- 2.2 Tottenham Hotspur Property Company Limited has now submitted a new planning application (HGY/2015/3000) and associated Listed Building Consent Application (HGY/2015/3001) revising its proposals for the new stadium and

remainder of the site. This new application proposes a number of changes from the earlier permission including:

- A larger stadium than that granted planning permission for which groundworks are currently underway (61,000 seats rather than 56,250) incorporating a retractable football pitch that allows the stadium to host NFL games and other sporting and non-sporting events. The club recently announced a ten year agreement to host a minimum of 2 NFL games a year from 2018.
- An increase in the number of residential units permitted (585 rather than 285) provided by way of 4 No residential towers up to 35 stories including 5 three storey residential units in the plinth facing Park Lane.
- An increase in the number of parking spaces
- A new Club store and museum described as 'The Tottenham Experience'.
- An 'Extreme Sports Centre'.
- A 180 bedroom hotel with an additional 49 serviced apartments.
- A community medical centre.
- 4000 m<sup>2</sup> of flexible community/office space (Use Class D1 or B1).
- The demolition of three locally listed buildings, 746, 748 and 750 High Road, and works to the Grade II Listed Warmington House for which a parallel application for Listed Building Consent (ref HGY/2015/3001) has been submitted.
- New and enhanced public realm including improvements to the existing public highway along the High Road, Park Lane and Worcester Avenue, and new public realm at street and podium level including a new public square.

2.3 This application is considered to be "Schedule 2 development" for which an Environmental Assessment is required. The application is accordingly accompanied by an Environmental Statement.

2.4 To facilitate the building of the development Tottenham Hotspur has also submitted a separate planning application (HGY/2015/3002) to use a 1.02 hectare site at 44 White Hart Lane as a construction compound for a temporary period of 3 years. The site is an authorised waste site which has a license for the recycling of motor vehicles. This use has now ceased on the site. The Club has already commenced using the site for the storage of plant and material being used in the current construction work being carried out at the stadium. The club intend to use the site for the housing of their construction management and construction worker welfare offices; the storage of construction materials; and for the location and operation of a concrete batching plant. As this proposal involves the change of use of a licensed waste management site it is being advertised as departure from the Development Plan.

### 3. Proposals:

### 3.1 Planning Application HGY/2015/3000 (Northumberland Development Project)

3.1.1 The planning application is a hybrid application seeking full permission for some parts of the scheme and outline permission for others.

3.1.2 Full planning permission is sought for:

- New 61,000 seat stadium and the surrounding public realm;
- ‘The Tottenham Experience’, a multi-use building comprising the club megastore, museum, cinema, café, Skywalk reception and changing facilities, stadium ticket office, and incorporating the Grade II Listed Warmington House in to the building;
- A 22-storey hotel comprising 180 bedrooms and 49 serviced apartments;
- The demolition of three locally listed buildings (746, 748 and 750 High Road), a terrace of seven houses (20 to 32 (evens) Worcester Avenue) which are vacant), the existing club shop and the current stadium.

3.1.3 Outline planning permission is being sought for:

- The construction of four residential blocks comprising:
  - 2 blocks up to 16 storeys (69m) in height above podium;
  - 1 block up to 24 storeys (96m) in height above podium; and
  - 1 block up to 32 storeys (123m) in height above podium.
 These towers will provide a maximum residential floor space of 49,000 m<sup>2</sup> or a maximum of 585 units including 5 three bedroom residential dwellings located on Park Lane.
- The construction of 4,000 m<sup>2</sup> 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 is sought at this stage for matters relating to “access”, “layout” and “scale”. The application seeks to reserve matters relating to “appearance” and “landscape”;
- The construction of an Extreme Sports building (Class D2) providing up to 2500 m<sup>2</sup> of floor space in a structure up to a max 51.2 m high. Detailed approval is sought at this stage for matters relating to “access” and “layout”. The application seeks to reserve matters relating to “appearance” and “scale”. The landscaping associated with this building will be submitted in full; and
- The Community Health Building (Class D1). Detailed approval is sought at this stage for matters relating to “access”, “layout” and “scale”. The application seeks to reserve matters relating to “appearance”. The landscaping associated with this building is submitted in full as it also forms part of the public realm for the new stadium.

### 3.2 Listed Building Application HGY/20150/3001 (Warmington House).

- 3.2.1 Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project.

### **3.3 Planning application HGY/2015/3002 (44 White Hart Lane).**

- 3.3.1 A separate application for temporary planning permission for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years.
- 3.3.2 The Club intends to use the site to support the early phases of development and seeks permission for a temporary period of three years, with the time limit to be secured by condition. This will allow the site to be used for the construction of the stadium and associated uses.
- 3.3.3 Temporary planning permission is sought for:
- 3-storeys of temporary portacabins to house housing site management and welfare offices;
  - Material storage;
  - Installation and operation of a concrete batching plant; and
  - 2.4m high boundary fence
- 3.4 HGY/2015/3000 & HGY/2015/3002 are being reported to Planning Committee as both are major planning applications. HGY/2015/3001 is an application for Listed Building Consent linked to HGY/2015/3001.

## **4. RECOMMENDATIONS**

### **4.1 Planning Application HGY/2015/3000 (Northumberland Development Project).**

4.1.1 That the Committee resolve to GRANT the application, taking account of the information set out in the Environmental Impact assessment, and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in the Appendices of this report, subject to the prior completion of a Section 106 Legal Agreement to secure the obligations set out below, of this report and subject to referral to the Mayor for London.

#### **Summary of key reasons for the recommendation:**

- The National Planning Policy Framework (NPPF) promotes sustainable development. The definition of sustainable development includes social, economic and physical development of an area to support the delivery of new homes and jobs to meet identified need.

- Having regard to the objective of securing delivery of development in line with the core objectives of the NPPF, the application has been assessed as being consistent with the strategic objectives of the Development Plan for the area which promotes sports led regeneration on the site as part of the wider regeneration of this area.
- The application indicates how it will support the delivery of significant economic growth and new housing and how this corresponds with the wider regeneration aspirations for the area expressed through the development plan and associated non statutory regeneration and planning frameworks, prepared and adopted by the Council and its partners. The London Plan sets housing and employment targets for each London borough and the proposals will contribute to meeting these targets. The regeneration of the Site is also a key contributor to the growth of Tottenham and will be a key to allowing for improvements to the physical, social and economic status of the area.
- The Site has been identified as suitable for significant redevelopment within local planning policy (and by way of earlier planning decisions) as well as acting as a wider catalyst for sustainable growth. The proposals allow for this significant site to be redeveloped which in turn will ensure that the wider benefits will be achieved.
- The Development is of high quality, with the potential to be considered iconic, it delivers substantial public benefits which will regenerate the area and act as a catalyst for wider regeneration, the heritage harm is necessary to deliver these public benefits and this outweighs this harm. The development is considered to be in accordance with Development Plan policies. None of the other material considerations outweigh the policy support for the development.

#### 4.1.2 The proposal delivers the following:

- A new “world class” 61,000 seat stadium capable of hosting a variety of major sporting and non sporting events, with improved safety, whilst attracting a significant number of additional visitors to the area.
- A new 180 bedroom hotel with an additional 49 serviced apartments.
- A new multi-use building, ‘The Tottenham Experience’, comprising the club megastore, museum and other visitor attractions.
- A Sports Centre (Class D2) with the aspiration for this to focus on extreme sports building including the potential for the world’s highest climbing wall and one of its deepest dive tanks.
- The creation of a leisure/sports focussed 7 day a week destination with an international profile.
- A package of measures including training secured by s106 to maximise the job opportunities for local people in construction and the operation of the proposed facilities.

- A new high quality public realm in and surrounding around the development including a new public square.
- New D1 space intended for use as a community health centre.
- The restoration of the Grade II Listed Warmington House and the repair of nine listed buildings within the site boundary so as to safeguard and secure future use of the retained heritage assets. .
- The construction of 585 new homes.
- An estimated 890 construction jobs.
- An estimated 820-1030 additional jobs (range depends on if community use or office)
- Estimated at least 19.45 million contribution to the local economy per year.

- 4.1.3 The application demonstrates that the proposals, whilst not currently capable of providing affordable housing, provide for a mechanism to secure contributions towards the delivery of off-site affordable housing in the event that the viability of the residential development improves significantly.
- 4.1.4 The loss of the three locally listed buildings proposed to be demolished; the Edmonton Dispensary, the former White Hart Public House and the Red House has been assessed. The view of the Council's Conservation Officer disagrees with the applicant's own assessment and concludes that the proposals will result in substantial harm to the Tottenham High Road Conservation Area. In her view the impact of the new stadium, hotel, 'extreme sports' building and 4 residential towers will, because of their height and overall size, have a negative impact on views from the conservation area over the site and the negative impact of the development on heritage is not mitigated by the refurbishment and restoration of Warmington House or the previously required repair and external refurbishment of the other listed and non listed buildings within the applicant's ownership, or by the high quality design of the different elements of the proposed development or by the quality of the proposed public realm. Overall the scheme is considered to result in substantial harm to the conservation area.
- 4.1.5 The Council has undertaken an assessment of all elements of the application and concludes that the harm is necessary to achieve the substantial public benefits and this harm is outweighed by the substantial public benefits.
- 4.1.6 The proposal would therefore satisfy the statutory duties set out in Section 66 and section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the tests in paragraph 133 of the NPPF, and accord to the design and conservation aims and objectives as set out in the NPPF, London Plan Policies 7.4, 7.5 and 7.6, saved UDP Policies UD3 and CSV4, Local Plan Policies SP11 and SP12 and SPG2 'Conservation and archaeology'.
- 4.1.7 The environmental effects of the development as detailed in the environmental information contained in the environmental statement have been assessed and,

subject to appropriate mitigation and controls, the proposals do not result in significant adverse environmental effects that would justify refusal of the planning application.

#### **4.2 Listed Building Application HGY/2015/3001 (Warmington House).**

4.2.1 That the Committee resolve to GRANT Listed Building Consent and that the Head of Development Management is delegated authority to issue the Listed Building Consent subject to the conditions and informatives set out below.

4.2.2 Summary of key reasons for the recommendation:

- Warmington House is currently in a very poor condition and is on Historic England's Heritage at Risk register. The proposed change of use and the associated works to its interior and exterior will fully restore much of its character and remove all detracting later additions enhancing its significance. The proposal would therefore satisfy the statutory duties set out in Section 66 and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, and accord to the design and conservation aims and objectives as set out in the NPPF, London Plan Policies 7.4, 7.5 and 7.6, saved UDP Policies UD3 and CSV4, Local Plan Policies SP11 and SP12 and SPG2 'Conservation and archaeology'.

#### **4.3 Planning application HGY/2015/3002 (44 White Hart Lane).**

4.3.1 That the Committee resolve to GRANT the application and that the Head of Development Management is delegated authority to issue the planning permission subject to the conditions and informatives set out in Appendices and subject to the completion of a Section 106 Legal Agreement to secure the obligations set out later in this report.

4.3.2 Summary of key reasons for the recommendation:

- The proposal is not considered to be a departure from the development plan policy SP6.
- The provision of a construction compound on this site will improve the efficiency of the construction phase on the main NDP site, allowing the stadium development to be completed more quickly and thus reducing the construction impacts on the locality.
- It will also allow for the concrete required to construct the stadium and associated structures to be prepared on a site within 150 metres of the NDP site and reduce the significant quantities of aggregate recycled on the site from having to be transported to destinations elsewhere for disposal/re-use. It is estimated that approximately 72,900m<sup>3</sup> will be excavated in order to form the basement, of this it is estimated that approximately 62,400m<sup>3</sup> can be reused on site (i.e. 88%). This will reduce the HGV vehicle kilometres generated by the construction phase of the NDP site which will have spin-off

benefits in terms of reducing the traffic and air quality impacts when considered in the round.

- While the proposal will have a localised impact on the highway network, in White Hart Lane and at the Junction of White Hart Lane and the High Road, these impacts are not significant and can be sufficiently mitigated by the conditions and obligations set out in the appendices and below.
- Localised impact on Air Quality arising from additional traffic into and out of the site will be offset by overall reductions in Carbon Dioxide emissions.
- The submitted noise assessment confirms that, subject to appropriate controls on the proposed operations the increase in noise from the proposed use would be within acceptable limits having regard to the surrounding residential land uses and taking account of the previous use.

## **5.0 PROPOSED DEVELOPMENT AND LOCATION DETAILS**

### **Planning Application HGY/2015/3000 and Listed Building Consent HGY/2015/3001 (Northumberland Development Project including Warmington House).**

#### **5.1 Proposed development**

5.1.1 The Northumberland Development Project comprises the following components:

- The new stadium;
- The Tottenham Experience, including Warmington House;
- The hotel and serviced apartments;
- The extreme sports building;
- The residential and associated flexible office and or community space;
- The community health building; and
- The public realm including the podium.

5.1.2 A summary of each of these development components is set out below.

#### **5.2 The New Stadium (Use Class D2 applied for in full)**

5.2.1 A new 61,000 seat stadium incorporating:

- A 17,000 seat single tier stand (the largest in the UK );
- A fully retractable pitch that allows the grass football pitch to retract beneath the southern stand, revealing an artificial surface able to host non-football sports such as American Football, concerts and community events;
- A new five-storey atrium space within the south stand that will provide a range of food and beverage outlets;
- A bold design comprising a perforated metallic mesh skin wrapped around the exterior, with large glass sections allowing views into interior of the stadium;



- A prominent stadium ‘front door’ opening up onto the High Road, also allowing views into the interior;
- A Media Café at the north-west corner of the stadium, fronting on to the High Road.
- A prominent entrance for the East Stand onto Worcester Avenue (forming the principal entrance to the Stadium when in use for NFL).
- Conference and banqueting.
- A ‘Sky Walk’ along the South Stand allowing people to climb the exterior of the building.
- Match day car parking located beneath the stands and in the basement, accessed from the High Road and Worcester Avenue.
- 17,053 sq.m. of food and drink uses are proposed, approximately half of this (to be determined during fit out) is likely to be Corporate Hospitality and restaurant spaces.

### **5.3 The Tottenham Experience (Sui Generis applied for in full)**

5.3.1 The Tottenham Experience is a large multi-use facility, located within the High Road Conservation Area and partly under the south-west corner of the proposed podium. Construction of the building and creation of the public realm along this stretch of the High Road results in the complete demolition of three Locally Listed Buildings on the site. The new building wraps around the rear of the Warmington House to create the appearance of a new terrace fronting the High Road and providing access to spaces within the restored Grade II Listed Warmington House. The building embodies a deliberate, contemporary design form which is visually “separated” from but “attached” to the Listed building by way of glazing and an enclosed atrium to the rear behind Warmington House allowing views of the rear of the Listed Building from the proposed elevated podium area. The Tottenham Experience provides another means of making the transition from street level to podium level.

5.3.2 The Tottenham Experience will accommodate a wide range of club-related leisure type uses within, and on the roof, of the resultant terrace that in combination are not considered to fall within any single defined use class and include the following elements:

- Club Shop (1955 m<sup>2</sup>)
- Ticket office & booths (242 m<sup>2</sup>)
- Cafe (260 m<sup>2</sup>)
- Roof walk reception and changing (100 m<sup>2</sup>)
- Museum (728 m<sup>2</sup>)
- Club cinema (400 m<sup>2</sup>)
- Warmington House
- Roof top terraces.

5.3.3 As well as incorporating Warmington House into a new terrace, the applicant intends to include elements from the fabric of the three locally listed buildings to be demolished into the interior spaces within the building, such as Bill Nicholson's office from 748 High Road ('The Red House') and part of the facade of the Edmonton Dispensary (746 High Road). Details of this approach are conditioned.

#### **5.4 Hotel and Serviced Apartments (Use Class C1 applied for in full)**

5.4.1 Located in the south west corner of the site, at the junction of High Road and Park Lane, will be a 22 storey (ground plus 21 stories) hotel. It is proposed as a long "blade" shaped building on a broadly north-south axis running down the High Road and integrated into the proposed stadium podium.

5.4.2 The hotel will have 180 bedrooms arranged over floors 3 to 14 with 49 serviced apartments over floors 15 to 21. The lower floor levels of the hotel will accommodate restaurants, bars, workspace, gym, swimming pool and corporate facilities. At the top floor level will be a foyer restaurant and roof-top bar. The hotel will be served by a dedicated basement car park accessed directly off the High Road, providing 76 car parking spaces. There will also be a dedicated coach and car/taxi drop-off point to the south of the hotel entrance on Park Lane.

5.4.3 The applicant intends that the hotel will incorporate dedicated training programmes for the hospitality sector, with a focus on ensuring local residents are able to take advantage of the new employment opportunities created. Submission of details of this programme, together with other local employment opportunities associated with the other elements of the application is conditioned.

#### **5.5 The Extreme Sports Centre (applied for in outline)**

5.5.1 Located along Park Lane and with a maximum height of 51.2m and providing a maximum 2,100m<sup>2</sup> of Leisure (class D2) floorspace for use as a sports centre that has the potential to accommodate a range of "extreme sports" and other sports focussed leisure activities, the details of which are not yet set. The building will sit on the eastern side of the Hotel and form the eastern part of a new eastern entrance plaza to the Stadium.

5.5.2 The planning statement describes the vision for the building as offering a range of unique sporting activities, with the potential to include one of the world's tallest indoor climbing walls, as well as a climbing wall along the outside of the building. The opportunity to incorporate a scuba diving tank is also currently being investigated. At the lower levels of the building, there will be space to accommodate high performance activities such as speed, agility and reaction tests for all ages and abilities. It is intended that the uses within the centre will be strongly linked to the national curriculum so that the centre can be used by local

schools and training centres. The applicant will be required to submit a community use strategy prior to the occupation of the building for agreement with the Council.

5.5.3 At the top of the building, 51.2m above ground floor, the applicants consider that there is the potential to accommodate a café that provides unique and unrivalled views of the climbing walls and diving tank, as well the stadium, public realm and wider Tottenham area.

5.5.4 At this stage the application seeks outline consent for this building, with full details submitted for approval covering access to the building, the layout and the surrounding landscaping. Detailed matters relating to scale and appearance are reserved to a later date once the exact form and nature of the uses to be incorporated within the building are more clearly defined.

## 5.6 The Southern Residential (applied for in outline)

5.6.1 The proposed residential component will provide up to 585 units (up to 49,000m<sup>2</sup> of floor space) and will occupy the south-east corner of the site, fronting both Park Lane to the south and Worcester Avenue to the east.

5.6.2 The application seeks outline planning permission for this element, with matters relating to “appearance” and “landscape” reserved for approval at a later date. Details are submitted for approval in relation to the “layout” and “scale” of the buildings as well as “access”.

5.6.3 To control the design quality that the development will deliver, a Residential Design Code Document is submitted in support of the planning application. The Design Code is submitted for approval and sets out a series of design requirements that any future reserved matter application must adhere to. The Design Code covers matters relating to the internal layout and the appearance of the residential buildings.

5.6.4 The residential development will deliver up to 585 new homes, comprising a mix of town houses and apartments.

5.6.5 Although not submitted for approval at this stage, an *indicative* mix of units for the residential comprises the following:

Studio	20	3%
1-bed	268	46%
2-bed	268	46%
3-bed	29	5%
TOTAL	585	100%

- 5.6.6 The application is conditioned such that no more than 5% of units shall be studios, no less than 5% shall be three bed units and no more than 50% shall be 1 bed units.
- 5.6.7 The Southern Residential will comprise four “tall buildings” that sit above a three storey podium structure that extends across the majority of the southern development area. The residential buildings include two 16 storey buildings (a maximum of 69m above podium), a 24 storey building (a maximum of 96m above podium) and a 32 storey building (a maximum of 123m above podium).
- 5.6.8 Each of the four residential blocks will have access directly from either Park Lane or Worcester Avenue at street level, and there will also be secondary access points at the plinth level.
- 5.6.9 There will also be 5 three bedroom townhouses located on Park Lane, with front doors and “garden space” fronting on to the pavement edge.
- 5.6.10 The residential development will be served by 270 car parking spaces within the podium structure, located at two lower basement levels, ground floor and first floor level. The car park entrance will be on Worcester Avenue. Lifts will connect the car park to all 4 towers. Cycle parking and refuse and recycling will be located in the basement and lower floor levels.

## **5.7 Flexible Community / Office Space (Use Class D1 and / or B1 applied for in outline)**

- 5.7.1 An area of up to 4000 m<sup>2</sup> of flexible space is proposed within the podium plinth, beneath the residential blocks. This flexible floorspace is submitted for outline approval with matters relating to “appearance” and “landscape” reserved at this stage. Details are submitted for approval in relation to the “layout” and ‘scale” of the buildings as well as “access”.
- 5.7.2 Permission is sought for the floorspace to be occupied by any one or mix of the following uses: community (Use Class D1) and office (Use class B1).
- 5.7.3 In the event that a district wide energy centre has not been delivered by the time this element of the scheme comes forward, this area could also be required to accommodate a site wide energy centre in order that the development meets the requirements of the energy hierarchy within the London Plan subject to feasibility and viability.
- 5.7.4 The floorspace will have access lobbies directly at street level on both Park Lane and Worcester Avenue.

## **5.8 Community Health building (Use Class D1) (applied for in outline)**

- 5.8.1 The scheme also includes the construction of a new building for D1 use in the north east of the site, fronting onto Worcester Avenue.
- 5.8.2 The application seeks outline planning permission for this element, with matters relating to “appearance” reserved for approval at a later date. Details are submitted for approval in relation to the “layout” and “scale”, “access” and “landscaping”.
- 5.8.3 The building will comprise two storeys above ground, rising to a maximum height of 21m.
- 5.8.4 The health uses will be located at first and second floor levels. The ground floor of the building will provide servicing space associated with the operation of the Stadium.
- 5.8.5 Officers are advised that the Club are in discussions with NHS England and a potential operator of the community health building. However this element of the scheme is subject to negotiations achieving a viable proposition for both the Club and a suitable operator. The applicant is not, therefore, in a position to commit to the provision of the community health building through the proposed s106 agreement. Should the health use not come forward the club will be seeking an alternative D1 use for this element of the site. Use for any other use class would require planning permission. Therefore this element of the scheme needs to be given appropriate weight in assessing the public benefits of the proposed scheme.

## **5.9 The Public Realm (submitted in full)**

- 5.9.1 The application incorporates details of significant changes to the surfacing and appearance of the High Road, Park Lane and Worcester Place roads and footways fronting the site, and the creation of significant new publicly accessible space above the podium to the north and south of the new stadium. The south podium area in particular is described as a “multi-use” space that incorporates a new public square, which is intended to host a variety of sports and community uses. The application indicates the aspiration for the Tottenham Hotspur foundation to operate a series of programmes and initiatives that will ensure use of the podium space for activities on non match days as well as when events are taking place in the stadium. This will include the integration of some existing programmes, which can be more beneficially delivered on the podium space. The section 106 agreement will secure at least 12 community events per year to be held on the podium for at least six years.

## **5.10 Summary of Land Uses**

- 5.10.1 The amount of development by use class is set out in the following table:

Land Use	Use Class	Area GIA (sqm)	Units
Leisure (including stadium (including 17,053 sq.m. food and drink uses around half of which is likely to be hospitality)	D2	122,045 (max)	n/a
Residential	C3	49,000	585
Sui Generis / Tottenham Experience	Sui Generis	4,311	n/a
Business	B1/D1	4,000 (max)	n/a
Community and Culture	D1	6,000 (max)	n/a
Hotel	C1	18,820	229 (180 rooms/49 serviced apartments)
Parking & Servicing Spaces	-		1224

## 5.11 Environmental Statement

- 5.11.1 The applicant did not submit a screening or scoping opinion however the Council is satisfied that the submitted (EIA) covers all necessary matters. The physical form and impacts of the development have been assessed by way of an Environmental Impact Assessment. This demonstrates that subject to mitigations and controls, the development does not give rise to environmental impacts that cannot be satisfactorily addressed so that the principle of the development is not acceptable. The EIA also highlights the forecast economic impacts of the development. The assessment provides a comparative assessment of the economic benefits arising from the proposed development, when compared with the existing position. The assessment concludes that the application has a significant positive economic impact on the locality and positive impact upon London. The non-technical summary is included in the appendices.

## 5.12 Planning Application HGY/2015/3002 (44 White Hart Lane – Temporary Construction Compound applied for in full)

### Proposed development

- 5.12.1 To facilitate the delivery and construction of the stadium-led development, the Club is seeking to accommodate a construction compound on this application site for a temporary period of 3 years.

5.12.2 The site will principally provide space for the following facilities to be accommodated:

- Site management and welfare facilities for the construction employees will be accommodated within temporary portacabins located to the south of the site and stacked up to three-storeys high. Details of the specification of the portacabins will be provided prior to installation and a limit of three stacked portacabins at a maximum height of 10m is secured by condition.
- A concrete batching plant ((maximum throughput of 400 cubic metres) is to be erected in the northern part of the site.
- Materials storage to be located to the north of the site. A maximum height of 6m is secured by condition.
- The height of plant on site will be limited by condition to 11.5m.
- A 2.4m hoarding will be erected around the perimeter of the site (part has been erected already where the buildings were demolished).

## 6. SITE AND SURROUNDINGS

### NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)

- 6.1 The application site consists of approximately 8.97 hectares of land located around White Hart Lane Stadium. The site is bounded by Park Lane to the south, Tottenham High Road, to the west, Worcester Avenue to the east and the edge of the completed Phase 1 'Northern Development' of the original planning permission.
- 6.2 The Northumberland Park area (and Tottenham Hotspur site) is identified as a location where development will be promoted in Policy SP1 of the adopted Strategic Policies DPD. The DPD says the following about Northumberland Park:
- Provision of a mix of land uses including the redevelopment of the football stadium;
  - Provision of appropriate residential use, including new build and renewal;
  - Provision of appropriate retail and leisure uses;
  - Appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;
  - High quality, sustainable design that respects its surroundings and preserves and enhances the area's historic environment;
  - Improving community safety, including reducing opportunities for crime and anti-social behaviour.
- 6.3 The application site also has a site allocation ( NT5) in the emerging Tottenham Area Action Plan DPD. The proposed allocation is for redevelopment of the existing stadium, including an increased capacity, and the introduction of

residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site. The pre submission draft of the AAP was considered by the Council at its meeting on 23<sup>rd</sup> November 2015.

- 6.4 A large section of the site to the north of the existing stadium between Paxton Road and Lilywhite House has been cleared of earlier buildings. Ground works in relation to Phase 2 'Stadium Development' of the original permission are currently underway.
- 6.5 The rest of the development site is occupied by the existing stadium, single storey club shop building, 3 locally listed buildings and the Grade II listed Warmington House all located at the site's southern end facing the High Road. The redline boundary also includes most of what is referred to as the 'Northern Terrace' a group of statutory and locally listed buildings fronting the High Road and including 796-814 High Road but excluding 792-794 High Road. It should be noted that while these buildings are within the redline boundary this application does not propose any alterations to them, although the applicant does commit to their retention and refurbishment and this will be secured in the Section 106 agreement.
- 6.6 The western edge of the site is covered by the North Tottenham/Tottenham High Road Conservation Area. The terrace of buildings at 790-812 High Road which backs on to the completed Northern Phase includes four Grade II\* listed buildings, five Grade II listed buildings and one locally listed building.
- 6.7 The redline boundary incorporates much of the public highway surrounding the site, in the High Road, Worcester Road and Park Lane. This land will remain public highway, however the application does propose significant improvements to it. Paxton Road and Bill Nicholson Way will be fully incorporated into the scheme and have already been formally "stopped up."
- 6.8 The site is located in Northumberland Park Ward, an area with significant levels of deprivation and higher rates of unemployment than in the rest of Haringey or London. On the Government's Index of Deprivation (2010) large parts of Northumberland Park and Tottenham were among the 5% most deprived areas in England. Some parts of Northumberland Park are among the 2-3% most deprived areas nationally.
- 6.9 A small portion at the north-west corner of the site has a Local Shopping Centre designation. The rest of the site and the High Road frontage is covered by Saved Site Specific Policy (SSP13) and the High Road performs many of the functions of a town centre for example accommodating a wide variety of main town centre uses, including a large food superstore, Council Offices, Tottenham Sports Centre and a Public Library. It also accommodates a range of commercial uses located on both sides of the High Road, mainly A1,A2, A3, A4 and A5 uses.



- 6.10 The administrative boundary with the London Borough of Enfield lies approximately 500m north of the site with Angel Edmonton and the A406 North Circular Road approximately 650m beyond. The Lee Valley and the London Borough of Waltham Forest lie approximately 1.5km to the east of the site. The nearest designated town centre is Edmonton in the London Borough of Enfield approximately 400 m to the north of the site. The designated town centre of Bruce Grove lies approximately 700m to the south of the site with the town centre of Seven Sisters a further 800m south of Bruce Grove. The Metropolitan Centre of Wood Green lies approximately 3km west of the site with Alexandra Palace a further 1.5km beyond. Tottenham Hale, where the Council is proposing to designate a district shopping centre, is located 1.5km to the south.
- 6.11 The London Liverpool Street to Stanstead Airport/East Anglia railway line, runs north-south to the east of the site with Northumberland Park station approximately 750m east of the site. The London Liverpool Street to Enfield Town/Cheshunt line, recently under the ownership of TfL as part of their Overground service, runs north-south to the west of the site with White Hart Lane station approximately 200m from the site.
- 6.12 The Public Transport Accessibility Level (PTAL) for the site ranges from 3 (moderate accessibility) on the eastern side to 5 (good accessibility). Bus service No's 149, 259, 279, 349 and W3 pass the site frontage along the High Road. The site lies within the Tottenham North CPZ and the much larger The Tottenham Event Day CPZ. Sainsbury operate a large customer car park on Northumberland Avenue.
- 6.13 Immediately to the east of Worcester Avenue is Northumberland Park Community Secondary School and Saint Paul and All Hallows Church of England Infant and Junior Schools. Immediately to the west of High Road lies St Francis de Sales Roman Catholic infant and junior school and further west is the Lancastrian Primary School.
- 6.14 The application site forms part of the "North Tottenham Neighbourhood Area" within the emerging Tottenham Area Action Plan and is located within an area identified in the Local Plan as an Area for Change where growth is expected. The application site and the existing planning permission for redevelopment are referred to in the AAP (Policy NT5). This emerging policy reflects the aspirations within the previous permission for a comprehensive redevelopment and sets out the planning requirements for any future applications on the site.
- 6.15 The area to the west of the Stadium forms part of the proposed NT3 High Road West site allocation in the emerging Tottenham Area Action Plan DPD.

#### **44 White Hart Lane (HGY/2015/3002).**

- 6.16 The site covers an area of 1.02ha (site plan included at Appendix 1).

The site consists of a wedge shaped parcel of land to the north of White Hart Lane covering an area of 1.02 ha. The site has a relatively small frontage on to White Hart Lane. Part of the site is situated in a conservation area. Most of the site is obscured by surrounding buildings and public views of the site are limited. The last use of the site was as a vehicle recovery facility. A Waste Management Licence issued by the Environment Agency on 10th January 2005 (and modified on 7<sup>th</sup> November 2008) imposed a maximum annual capacity of 24,000 vehicles per year. London Plan Policy 5.17 safeguards existing waste sites, normally requiring a compensatory replacement should a waste site be lost to non-waste use.

- 6.17 The application site is located within High Road West (NT3) site allocation in the emerging Tottenham AAP which is part of the wider Northumberland Park Area of Change identified within the Local Plan. The High Road West regeneration area envisages a comprehensive redevelopment creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square. A master plan for the High Road West area has been prepared, in consultation with local residents and businesses and was considered by Cabinet at its meeting on the 16 December 2014. The Council's Strategic Regeneration Framework envisages that High Road West will play a key role in delivering the aspirations for regenerating the area.
- 6.18 The site is bound by B2/B8 industrial warehouses to the east (Peacock Estate) and railway arches supporting an active railway line to the north and west. The extent of the site and its triangle shape is dictated by the railway line that runs north-east to south. The site is bounded to the south east by industrial uses (Carbury Enterprise Park).
- 6.19 The site was until recently vacant having been previously used as a vehicle scrap yard. A large open-sided sheet metal structure in the centre of the site has been retained. Following the cessation of the scrap use, the applicant has begun storing construction materials removed from the site on the land and have in recent weeks begun to move plant and other equipment onto the site.
- 6.20 The area surrounding the site to the north and east is predominately industrial and commercial in character. Typical building forms are single storey modern warehousing units and associated yards. 52 White Hart Lane is a locally listed building located immediately to the south, formerly the Station Master's House this building is now owned and operated as offices by the Council. Immediately to the north is a large retail unit that was formerly a Sainsbury's superstore. Immediately beyond that is the new Brook House residential development built on the site of the former Cannon's factory.
- 6.21 To the south of the site, on the opposite side of White Hart Lane, is the Love Lane Estate, a post war council housing estate, consisting of 4 to 10 storey housing blocks.

- 6.22 Immediately to the west of the site, beyond the railway viaduct, is Pretoria Road which is comprised of 2-storey terraced dwellings and Haringey 6<sup>th</sup> Form College.
- 6.23 The site is accessed via a gated entrance leading onto White Hart Lane, which runs east/west. Approximately 150m east of the site entrance, as discussed, is the junction of White Hart Lane and the High Road.
- 6.24 Tottenham Hotspur Football Club (THFC) is located approximately 250m east of the site, opposite the junction of White Hart Lane and the High Road.
- 6.25 Approximately, 20m west of the site is White Hart Lane Train Station. The station provides services into central London and north to Cheshunt and Enfield. White Hart Lane and the High Road are served by multiple bus routes that service destinations throughout north London. Public Transport Accessibility Level (PTAL) of the site is 5 ('Good').
- 6.26 A small part of the site, its frontage to White Hart Lane, lies within the North Tottenham/Tottenham High Road Conservation Area.

## 7 RELEVANT PLANNING HISTORY

### **NDP Site (Applications HGY/2015/3000 & HGY/2015/3001).**

- 7.1 The Stadium and associated land have an extensive planning history. The most relevant to the current application are:

**HGY/2010/1000** Demolition and comprehensive redevelopment of a stadium (Class D2) with hotel (Class C1), retail (Class A1 and/or A2 and/or A3 and/or A4 and/or A5), museum (Class D1) offices (Class B1) and housing (Class C3); together with associated facilities including the construction of new and altered roads, footways, public and private open spaces; landscaping and related works. Details of "appearance" and "scale" are reserved in relation to the proposed residential and hotel buildings. **Decided 20.09.2011.**

**HGY/2010/1001** Conservation Area Consent for demolition of 734-740, 742, 744a, 752a, 752b, 752c, 754-766, 768-772, 776 and 778-788, 806a, 806b High Road, N17, Paxton Hall, Paxton Road, N17, 2-6 Northumberland Park, N17 and any other buildings and structures within the curtilage of these buildings on land bordered by Northumberland Park N17 to the North, High Road N17 to the West, Park Lane N17 to the South and Worcester Avenue N17 to the East within the North Tottenham Conservation Area in conjunction with the comprehensive redevelopment of adjoining land for a stadium with hotel, retail, museum, offices and housing, together with associated facilities including the construction of new and altered roads, footways, public and private open spaces, landscaping and related works. **Decided 20.09.2011.**

**HGY/2011/2350** Planning Permission for proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works. **Decided 29.03.2012.**

**HGY/2011/2351** Outline Planning Permission for Proposed demolition and redevelopment to provide housing (Use Class C3) college (Use Class D1) and/or health centre (Use Class D1) and/or health club (Use Class D2) together with associated private and public open space, car parking, landscaping and related works; and altered footways, roads and vehicular accesses. Outline application with details of appearance, scale and landscaping reserved for subsequent approval. **Decided 29.03.2012.**

**HGY/2012/0096** Non- material amendment following a grant of planning permission HGY/2010/1000. **Decided 28.02.2012.**

**HGY/2013/1973** Variation of condition 42 attached to planning permission HGY/2011/2350 "Proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works", for variation of fourth floor plan to allow for proposed change of use from stadium-related uses to Use Class B1a and associated minor alterations. **Decided 31.03.2014.**

**HGY/2013/1976** Variation of condition 42 attached to planning permission HGY/2011/2350 "Proposed demolition of buildings and development of a foodstore (Use Class A1) together with educational uses (Use Class D1); stadium-related uses (Use Class D2); showroom/brand centre (sui generis); and associated facilities including car parking, the construction of new and altered vehicle and pedestrian accesses, private open spaces, landscaping and related works", for variation of second floor plan to allow for proposed change of use from stadium-related uses (Use class D2); showroom/brand centre (sui generis), to Class D1 to form a new university technical college and associated minor alterations. **Decided 31.03.2014.**

**HGY/2014/2326** Non-material amendment following a grant of planning permission HGY/2013/1976 for variation of condition 3 in relation to rear boundary works. **Decided 26.08.2014.**

**HGY/2014/2327** Non-material amendment following a grant of planning permission HGY/2013/1973 for variation of condition 3 in relation to rear boundary works. **Decided 26.08.2014.**

**HGY/2015/0797** Application for approval of reserved matters relating to the scale of buildings in Phase 3 'the Southern Development' granted outline permission (HGY/2011/2351) for the redevelopment of site to provide housing (Use Class C3), college (Use Class D1) and/or health centre (Use Class D1) and/or health club (Use Class D2) together with associated private and public open space, car parking, landscaping and related works. This application is pending.

**HGY/2015/0964** Application under Section 73 of the Town and Country Planning Act 1990 for a minor material amendment to Planning Permission Reference HGY/2010/1000 granted on 21 September 2011 for: Demolition and comprehensive redevelopment of a stadium (Class D2) with hotel (Class C1), retail (Class A1 and/or A2 and/or A3 and/or A4 and/or A5), museum (Class D1) offices (Class B1) and housing (Class C3); together with associated facilities including the construction of new and altered roads, footways, public and private open spaces; landscaping and related works. Details of "appearance" and "scale" are reserved in relation to the proposed residential and hotel buildings. The minor material amendment being sought is a variation to Condition 1 (Approved Drawing Numbers) added by non-material amendment (Ref: HGY/2011/2200) to provide a new basement level beneath the approved stadium in order accommodate some of the already consented car parking spaces proposed at ground floor level, as well as plant and storage areas, and amendments to the consented ground floor layout to allow for extended player changing facilities, enhanced media facilities and other associated stadium uses. No changes are proposed to the external appearance or the height, scale and mass of the consented stadium. The application also proposes removal of conditions: 1, 3, 5, 6, 7, 8, 11, 12, 13, 14, 15, 19, 24, 25, 26, 27, 28, 29, 31, 33, 34, 35, 36, 37, 38, 39, 43, 44, 45, 47, 48, 49, 60, 61, 62 and 63 , and variations to conditions 2, 30, 54 and 58 of planning permission reference HGY/2010/1000. **Decided 22.06.2015.**

- 7.2 In addition to the above all pre-commencement conditions relating to the Phase 1 'Northern Development' and Phase 2 'Stadium Development' have been discharged.

#### **44 White Hart Lane (HGY/2015/3002).**

- 7.3 There is no planning history relating to the majority of the site and its previous use as car breakers. The site did have three small single storey commercial/shop units fronting White Hart Lane which were recently demolished:

**HGY/2015/1352** Prior Approval not required for the demolition of 48-50 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015.**

**HGY/2015/1353** Prior Approval not required for the demolition of 44 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015.**

**HGY/2015/1354** Prior Approval not required for the demolition of 46 White Hart Lane a single storey, flat roofed building of brick construction with partially glazed frontage onto White Hart Lane. **Decided 03.07.2015.**

## 8 CONSULTATION

### **NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)**

**Haringey Quality Review Panel** The scheme was presented on 15<sup>th</sup> July 2015, and a follow up presentation was held 21<sup>st</sup> October 2015. The Panel Notes are attached in the Appendices.

**Haringey Development Management Forum** was held on 15th July 2015. 46 people attended the Forum. Matters raised included impact on heritage, tall buildings, level of affordable housing, impact on the amenity of local residents from the current stadium as well as the proposal, viability, disclosure of the viability assessment and transportation.

The following were consulted regarding the application:

#### **Internal:**

- LBH Transportation Group (including the Highway Authority)
- LBH Head of Carbon Management
- LBH Sustainability
- LBH Economic Regeneration
- LBH Economic Development
- LBH Tottenham Team
- LBH Conservation Officer
- LBH Flood and Surface Water
- LBH Cleansing (Refuse & Recycling)
- LBH Licensing
- LBH Food & Hygiene
- LBH EHS - Noise & Pollution
- LBH Nature Conservation
- LBH Education

#### **External:**

- Greater London Authority
- London Fire Brigade
- Metropolitan Police
- Transport for London

Environment Agency  
 Natural England  
 Thames Water  
 Sport England  
 Historic England  
 Greater London Archaeology Advisory Service  
 The Victorian Society  
 Georgian Group  
 Council for British Archaeology  
 Twentieth Century Society  
 Ancient Monuments Society  
 Society for the Protection of Ancient Buildings

### **Neighbouring Boroughs:**

L. B. Hackney  
 L. B. Enfield  
 L. B. Waltham Forest  
 L. B. Barnet  
 L. B. Islington  
 L. B. Camden

### **Local Groups:**

Tottenham CAAC  
 Tottenham Civic Society  
 Headcorn and Tenterden Resident Association  
 Love Lane Residents Association  
 High Road West Business Steering Group  
 Northumberland Park Residents Association  
 The Lindales and Bennetts Close Residents Association  
 Tottenham Traders Partnership  
 Tottenham UTC

The responses are set out in a table in the Appendices and summarised as follows:

### **Internal:**

#### 1) LBH Conservation

The comments of Haringey's Conservation Officer are dealt with in section 10.4 and 11.5 of this report.

#### 2) LBH Transportation

The comments of Haringey's Transportation Officer are dealt with in section 10.5 of this report.

3) LBH Carbon Management

In appendices, requires conditions and obligations.

4) LBH Air Quality

In appendices, requires conditions and obligations.

**External:**

- 5) **The Victorian Society:** Object to the loss of the locally listed buildings which make an important contribution to the streetscape, the history of the area and indeed the history of the football club. The new stadium is out of keeping with the scale and character of the area. Retaining and refurbishing the locally listed buildings would represent an enhancement of the Conservation Area, which is a requisite of the NPPF, and would go some way in mitigating the dramatic impact the new stadium will have on many other heritage assets.
- 6) **Thames Water:** No objections raised but recommend standard conditions and informatives relating to surface water drainage, ground water discharge, sewage connections, effluent discharge, water supply and measures to protect local water and sewage infrastructure during construction.
- 7) **Natural England:** No objections. The response refers to standing advice to Protected Species and suggestions are made for Biodiversity and Landscape Enhancements.
- 8) **London First:** Supports the proposal. The proposal has the potential to be a catalyst for the regeneration of the wider area
- 9) **Historic England:** , Objects: *'Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to preserve the setting of a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done.'*



- 10) **Historic England -The Greater London Archaeological Advisory Service (GLAAS):** No objections raised. The proposal is unlikely to have a significant effect on assets of archaeological interest.
- 11) **Metropolitan Police:** Support the scheme as a whole. Extensive consultation between the relevant stakeholders has benefitted the proposed designs in delivering safer, more secure facilities. With ongoing consultation on designing out crime and approved protective security measures, the facilities should achieve the required standards. With regard to the proposed residential parts of the scheme, recommend that a planning condition be imposed requiring the residential parts of the scheme comply with Secured by Design standards.
- 12) **Environment Agency:** No objection subject to the approval of the Lead Local Flood Authority (LB of Haringey). Provide advice to LBH Senior Drainage Engineer on matters relating to Surface Water Drainage, Flood Defence and on Groundwater and Contaminated Land.
- 13) **Council for British Archaeology:** Object to the loss of heritage assets and destruction of the street scene. Although the new stadium may be claimed to outweigh these disadvantages on the grounds of community use/benefit, it would be possible to provide a new stadium without destroying local character.
- 14) **London Fire and Emergency Planning (London Fire Brigade):** Having initially raised concerns about the scheme the Brigade are now satisfied with proposals for fire fighting access.
- 15) **Save Britain's Heritage:** Object to the loss of the three locally listed buildings. Do not agree that their demolition is the only way of resolving crowd safety issues. Would withdraw their objection if the scheme is revised to retain the buildings as part of the wider development.
- 16) **GLA/Mayor for London:** The application was referred to the Mayor under the requirements of the Mayor for London Order 2008. The officer's report set out that proposal was supported in principle, the provision of new sporting and recreations facilities was strongly supported, that the design was of high design quality and potentially iconic, that the development benefits had the potential to outweigh the substantial harm caused by the demolition of the locally listed buildings if the dispensary facade was reprovided in the Tottenham Experience and further information was sought on in particular climate change. The Mayor however took a different view to Officers on the locally listed buildings and set out in the covering letter that these buildings should be retained.

The Stage 1 response and report are also attached in full in the appendices of this report.

- 17) **TfL:** Transport for London's response to the application is dealt within in the main body of this report and is attached in full in the appendices of this report.

#### **44 White Hart Lane (Application HGY/2015/3002)**

The following were consulted regarding the application:

##### **Internal:**

LBH Transportation  
 LBH Tottenham Team  
 LBH Conservation Officer  
 LBH Flood and Surface Water  
 LBH Cleansing (Refuse & Recycling)  
 LBH EHS - Noise & Pollution  
 LBH EHS - Contaminated Land  
 LBH Emergency Planning

##### **External:**

The Victorian Society  
 Met Police - Designing Out Crime Officer  
 Transport for London  
 Georgian Group  
 Environment Agency  
 Historic England  
 Metropolitan Police  
 Network Rail

##### **Neighbouring Boroughs:**

L. B. Enfield

##### **Local Groups:**

Tottenham CAAC  
 High Road West Business Steering Group  
 Tottenham Traders Partnership  
 Love Lane Residents Association  
 Northumberland Park Residents Association  
 Tottenham Civic Society

The responses are summarised as follows:

##### **Internal:**

## 18) LBH Conservation

No harm caused given the temporary nature of the use.

## 19) LBH Transportation

The comments of Haringey's Transportation Officer are dealt with in section 11.3 of this report.

**External:**

- 20) **Environment Agency:** No objection subject to the approval of the Lead Local Flood Authority (LB of Haringey). Provide advice to LBH Senior Drainage Engineer on matters relating to Surface Water Drainage, Flood Defence and on Groundwater and Contaminated Land.
- 21) **GLA/Mayor for London:** The application was referred to the Mayor under the requirements of the Mayor for London Order 2008. At Stage One the Mayor responded to say that the application did not raise any strategic issues.

**9 LOCAL REPRESENTATIONS****NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)**

- 9.1 These applications were originally publicised by way of 20 site notices, a notice in the newspaper on 18<sup>th</sup> September 2015 and 2,024 letters to homes in Almond Road, Argyle Road, Brereton Road, Bromley Road, Chapel Place, Church Road, Commonwealth Road, Coniston Road, Gascoigne Close, Harpers Yard, High Road, James Place, King Street, Kings Road, Lancaster Close, Love Lane, Moselle Place, Moselle Street, Northumberland Park, Orchard Place, Park Lane, Park Lane Close, Ruskin Road, St Pauls Road, Sutherland Road, Taylor Close, Trulock Road, Vicarage Road, White Hart Lane, Whitehall Street, William Street and Worcester Avenue. The application has also been highlighted on the Planning Service Web pages (part of the Council Web site) since the 18<sup>th</sup> September.
- 9.2 Following the submission of further information in support of the application the Council re-consulted all previous consultees in accordance with Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) on the 13<sup>th</sup> November 2015. This included new site notices and a press notice.
- 9.3 The number of representations received from neighbours, local groups etc in response to both of these notifications and publicity of the application is, as of 30 November 2015:

No of individual responses: 117

Objecting: 45

Supporting: 98

Others: 28

9.4 The following groups/societies/organisations made representations:

- Tottenham CAAC (obj)
- Tottenham Conservation (obj)
- Tottenham Business Group (obj)
- Out Tottenham Network (obj)
- Friends of Alexandra Park
- Haringey Sports Development Trust (sup)
- Tottenham Hotspur Supporter's Trust (sup)
- Gladesmore Community School (sup)
- Brook House Primary School (sup)
- Barnet and Southgate College (sup)
- Haringey Mencap (sup)
- Newlon Housing Trust (sup)
- UEFA (sup)
- Epping Forest College (sup)
- Barnet Southgate College (sup)
- London First (sup)
- Brooke House Primary School (sup)
- NFL (sup)
- Lea Valley Regional Park Authority (sup)
- Tottenham Business Group (obj)
- Save Britain's Heritage (obj)
- Lammas (obj)

9.5 No Councillors made representations.

9.6 The following issues were raised in representations from the local community and local groups that are material to the determination of the application and are addressed in the next section of this report. The main issues raised are also responded to in a table included in the appendices.

### Support

- Will benefit the local economy.
- Will improve and regenerate a rundown area.
- The proposals look great.
- Will be the most advanced sports venue in the world.

- While the loss of the locally listed buildings is a shame the benefits of the new buildings will outweigh their loss.
- Proposal will provide a year round 7-day a week visitor attraction.
- The stadium attracted a crowd of 75,038 in 1938, if the transport infrastructure could cope back then, it won't have any difficulty coping now.
- NFL and extreme sports will attract more visitors.
- Will provide additional housing.
- Will provide a new community health centre.
- The narrow pavement in front of the locally listed building cannot accommodate crowds of 30,000 so won't be able to accommodate 61,000.
- Will provide more opportunities for community programmes.

### Objection

- Loss of locally listed buildings.
- Proposal does not preserve or enhance the character of the area and is a vanity project.
- Proposals will be harmful to the Listed Building (Warmington House) and its setting.
- Will lead to the demolition of neighbouring social housing and the 'social cleansing' of the area.
- Loss of local businesses.
- Most local businesses will not benefit from the development and indeed may be squeezed out.
- Buildings are too tall and will dominate the skyline.
- Buildings are overbearing and will overshadow neighbours, reducing their daylight and sunlight.
- There hasn't been enough consultation with the local community.
- Disruption and nuisance from the construction of the development.
- Insufficient affordable housing
- Football stadium blight the area through congestion and the behaviour of football supporters.
- Impact on public transport in the area.
- Impact on parking and loading in the area.
- Proposal's energy strategy does not provide enough renewable energy or enough carbon savings

### Comments

- Qualified support if the applicant does as the Mayor asks and retain the locally listed buildings.
- Should include more affordable housing.

### **44 White Hart Lane (Application HGY/2015/3002)**

The application has been publicised by way of 2 site notices, a notice in the local press on the 25<sup>th</sup> September 2015 and 863 letters.

### Local representations

9.7 The number of representations received from neighbours, local groups etc in response to notification and publicity of the application were as follows:

No of individual responses: 24  
 Objecting: 24  
 Supporting: 0  
 Others: 1

9.8 No groups/societies made representations.

9.9 Councillor Bevan made two representations:

*'I am very concerned as to this proposal as this is a very narrow main road with many bus routes. It is also yellow lined with double and single yellow lining. It also has obscured vision due to nearby bends in this road. There is often a tail back of traffic, past the entrance to this site, from the traffic lights at the junction with Tottenham High Road. White Hart Lane and the entrance to this site seems very narrow considering the size of the vehicles that could be using this construction site. I await the input of Highways management into this consultation.'*

*'I am aware from the local residents on line comments that they have other issues in addition to those mentioned in my first response. Please ensure that they are fully considered before taking a decision on this application.'*

9.10 The following issues were raised in representations that are material to the determination of the application and are addressed in the next section of this report.

### Objections

- The proposed site is no longer 'Industrial' in nature, over 100 new residential units have recently been built - the Rivers Apartments building and the new blocks of flats on Cannon Road which will be seriously affected by the noise levels. (Officer comment- the site is still allocated as industrial)
- Adverse impact on the highway safety.
- Will add traffic to an already congested junction.
- White Hart Lane and the entrance to this site seems very narrow considering the size of the vehicles that could be using this construction site.
- Impact of noise on nearby residential properties.
- The new flats in Rivers Apartments already suffer noise from the adjacent railway and existing industrial uses in the area.
- Impact of working into the evenings and at weekends on neighbouring residents.

- Dust, particulates and general pollution.
- The proposal is purely for Tottenham Hotspur to save money which does not justify the harm it will cause.
- Proposal will disturb residents sleep.
- Questions the objectivity of the noise report submitted with the application.
- Impact on the mental health of residents.
- 3 years is not a temporary period.
- Will not allow residents to enjoy their balconies.
- Impact on bus journey times.
- The construction compound should be moved to an industrial area which there are many of in Haringey.

### General comments

- While no comments were received in support of the compound a resident did voice their support for the regeneration of the area and stated they would not object to proposal if it was restricted to weekday and normal daytime working.

## **10.0 MATERIAL PLANNING CONSIDERATIONS**

### **NDP Site (Applications HGY/2015/3000 & HGY/2015/3001)**

The main planning issues raised by the proposed development are:

1. Principle of the development
2. Regeneration
3. Design
4. Heritage
5. Transport
6. Energy/Sustainability
7. Air Quality
8. Daylight/Sunlight
9. Microclimate
10. Noise
11. Amenity
12. Ecology
13. Equalities
14. Conclusion

## **10.1 PRINCIPLE OF DEVELOPMENT**

### NPPF

10.1.1 The NPPF establishes overarching principles of the planning system, including the requirement of the system to “drive and support development” through the local

development plan process and supports “approving development proposals that accord with the development plan without delay”. The NPPF also expresses a “presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking”.

- 10.1.2 The NPPF has 12 core planning principles., These include clear statements about the importance of a plan led approach, and the need to plan creatively, and actively to promote growth whilst considering local characteristics, securing high quality design and amenities and supporting the move to a low carbon economy, whilst optimising land use and densities and conserving and respecting heritage interests.
- 10.1.3 The NPPF encourages the ‘effective use of land by reusing land that has been previously developed’. In respect of applications that include provision of housing, the NPPF highlights that delivery of housing is best achieved through larger scale development.
- 10.1.4 Paragraphs 126 to 141 meanwhile contain the heritage specific policies in the NPPF. The objective of these policies is to maintain and manage change to heritage assets in a way that sustains and, where appropriate, enhances its significance. That significance is the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. This significance may derive not only from its physical presence but also from its setting. These are dealt with in more detail in the Heritage section of this report.

### The Development Plan

- 10.1.6 For the purposes of S38(6) of the Act the Development Plan consists of the London Plan, Haringey’s Local Plan Strategic Policies and the saved policies of Haringey’s Unitary Development Plan. The Council is consulting on the Alteration to its strategic policies document and a new suite of documents including the Tottenham Area Action Plan and Development Management Policies DPD. The Council is also working with the authorities of North London on a Joint Waste Local Plan DPD. Consultation on the preferred option took place in July 2015 and the project team are considering responses to the consultation exercise, in anticipation of publication of a pre-submission draft of the document in spring 2016. The policies of that draft document seek to safeguard existing waste sites from development for alternative uses. The site at 44 White Hart Lane is a waste site. The waste local plan can, because it is at an early stage in its preparation, only be assumed to carry very limited weight insofar as it engages with the development proposed. .

### London Plan

- 10.1.7 The London Plan (2015) sets a number of objectives for development through various policies which are set out below:



- To promote and enable growth within London (Policies 2.7 and 4.1).
- To promote growth in Opportunity Areas (this site lies within the Lee Valley Opportunity Area)
- Supporting the diverse range of professional sporting and entertainment enterprises along with the cultural, social and economic benefits that they offer to residents, workers and visitors (Policy 4.6).
- To support bringing forward capacity for retail, commercial, cultural and leisure development in town centres (Policy 4.7).
- To recognise the importance of increasing housing supply and choice (Policy 3.3), optimising housing output (Policy 3.7) and include complementary non-residential uses within large residential developments (Policy 3.7).
- Creating mixed communities through meeting needs and fostering social diversity (Policies 3.1 and 3.9) and through providing affordable housing (Policy 3.10).
- Seeking to reinforce qualities of heritage assets in order to stimulate regeneration (Policy 7.9).
- To create lifetime neighbourhoods through designing to interface with surrounding land (Policy 7.1) and achieve high standards of accessible and inclusive design (Policy 7.2).
- To support high density development relative to accessibility and public transport capacity (Policy 6.1).

#### Haringey Local Plan Strategic Policies (2013)

10.1.8 Haringey's Local Plan Strategic Policies document highlights the importance of growth areas within the Borough. The Local Plan designates Northumberland Park as an area for regeneration and this includes the redevelopment of the Football Club and Seven Sisters Corridor.

10.1.9 Policy SP1 of the Local Plan relates to managing growth within the Borough and states that the Council will focus on suitable locations to ensure that achieve strong, healthy and sustainable communities. The Site is located within the Northumberland Park Area of Change within the Local Plan which specifically highlights capacity for further growth.

10.1.10 The Local Plan sets out the future aspirations for Northumberland Park as follows:

- Provision of a mix of land uses including the redevelopment of the football stadium;
- Provision of appropriate residential use, including new build and renewal; Provision of appropriate retail and leisure uses;
- Appropriate contributions to open space, community facilities, regeneration initiatives and employment and training schemes;

- High quality, sustainable design that respects its surroundings and preserves and enhances the area's historic environment;
- Improving community safety, including reducing opportunities for crime and anti-social behaviour.

10.1.11 Other relevant policies are as follows:

- SP2-Affordable housing- borough target of 50% with maximum reasonable amount in individual sites
- SP4 Working towards a Low Carbon Haringey
- SP5 Water Management and Flooding
- SP6 Waste and Recycling
- SP7 Transport
- SP8 Employment
- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion
- SP10 Town Centres
- SP11 Design
- SP12 Conservation
- SP14 Health and Well-Being
- SP15 Culture and Leisure
- SP16 Community Facilities

### **Haringey Saved UDP Policies**

- UD7 Waste Storage
- ENV5 Works affecting the Water Course
- ENV6 Noise Pollution
- ENV7 Air, Water and Light Pollution
- EMP5 Promoting Employment Uses
- TCR2 Out of Town Centre Development
- TCR3 Protection of Shops in Town Centres
- TCR4 Protection of Local Shops
- TCR5
- M10 Parking for Development
- SSP13 White Hart Lane Stadium

### **Haringey Saved Policies SSP13**

10.1.12 Site Specific Policy 13- White Hart Lane Stadium, High Road, N17. Existing use: Football stadium, retail and Employment Proposal: Expansion. Including better facilities and mixed use development, including residential & possibly a hotel.

### **Emerging Tottenham Area Action Plan December 2015**

- 10.1.13 The pre submission draft of the AAP was considered by the Council at its meeting on 23<sup>rd</sup> November 2015 and was agreed for publication. As such the AAP is considered to be a material planning consideration that can be accorded some, although not the same weight as the development plan. The document provides site specific and area based policy to underpin the delivery of the spatial vision set out in the adopted Strategic Policies DPD and the suite of DPDs' emerging alongside the Tottenham AAP to articulate the spatial vision for growth.
- 10.1.14 Policy AAP1 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the regeneration objectives for the Tottenham AAP area are achieved. It also places a responsibility on the Council to proactively work with landowners, the Mayor of London, the local community and other parties to help deliver the aims of the AAP. These aims include:
- To reduce social inequalities.
  - Improve the quality and supply of housing to meet housing needs;
  - Improve health and wellbeing.
  - Create a diverse and sustainable economy.
  - To deliver the necessary infrastructure to support change in Tottenham;
  - To improve the local environment, reduce carbon emissions and adapt to climate change.
- 10.1.15 The Council expects all development proposals in the AAP area to come forward as part of wider comprehensive redevelopment proposals, taking account of adjacent uses (existing or proposed) and neighbouring landowner expectations.
- 10.1.16 The application site is located within the heart of the North Tottenham Neighbourhood Area for which there are a number of site allocations, incorporating the site and adjacent land. They are set below:

#### NT7: Tottenham Hotspur Stadium

- 10.1.17 This site allocation has been identified for the redevelopment of the existing football stadium in order to increase match day capacity along with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.
- 10.1.18 The AAP states that for any future application for the site, the Council would seek:
- Comprehensive redevelopment of the site;
  - High quality design;

- Increase in residential on 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; and
- Address the statutory presumption in favour of retaining heritage assets unless justifiable;
- Improved connectivity between east and west.

#### NT4: Northumberland Park

10.1.19 Proposed allocation is for the masterplanned development of the area to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include the provision of additional high quality housing with an increased range of types, sizes, and tenures, improvements to existing housing stock, new public spaces and new community infrastructure.

10.1.20 The site requirements as set out within the AAP states that:

- Development will be in conformity with any future adopted masterplan for the area.
- Redevelopment will create more, new, and better housing with greater diversity of scale and tenure and type, and will contribute to the creation of a Family Housing Area.
- Existing east-west routes will be enhanced, including Park Lane as a pedestrian and cycling friendly route and Local Centre, connecting Tottenham High Rd and the Lee Valley Regional Park. Bus routes will be improved through the area and link with Northumberland Park Station.
- A fine graining of the road network in the area will be created with the aim of increasing permeability. There will be a strong focus on creating new north-south streets and new streets must connect to existing streets to the north and south of the area, and to new spaces proposed around the new stadium development to the west.
- Retention of good housing stock where appropriate.
- Taller buildings will be located at the south east corner of the site as part of the proposed Northumberland Park tall buildings cluster, and in the west and south west of the site adjacent to the stadium development.
- Small scale commercial development along Park Lane and at Northumberland Park Station. Any commercial should not detract from the main aim of concentrating town centre uses on the High Road.
- New health infrastructure will be provided within the area.
- Education infrastructure will be enhanced including the provision of a new through school within the Masterplan area.

#### NT5: High Road West

10.1.21 The overall High Road West site allocation has been masterplanned by Arup for comprehensive redevelopment creating a mixed use neighbourhood including a new public realm linking White Hart Lane Station and the redeveloped football stadium as well as an expanded local shopping centre for the High Road.

10.1.22 The site requirements as set out within the AAP states that there will be:

- A minimum of 1,400 new homes with a mix of tenure, type and unit size;
- Creation of a new connection between White Hart Land Station, the High Road and redeveloped football stadium;
- An increase in the quality and quantity of community facilities;
- Sympathetic development to heritage assets which should seek to enhance the overall viability and attractiveness of future investment for heritage buildings in the area;
- New transport improvements delivered including new entrance to White Hart Lane Station

#### Alterations to Strategic Policies DPD

10.1.23 The proposed changes to Haringey's Strategic Policies reflect a number of changes in the overarching planning framework at the national and regional level, which affect planning locally. The most significant being the adoption of the Further Alterations to the London Plan (FALP) that significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. The plan also reflects the more challenging position in respect of affordable housing delivery.

10.1.24 The pre-submission draft of the proposed changes to Haringey's Strategic Policies were considered by the Council at its meeting on 23rd November 2015 and were agreed for publication. The document can therefore be afforded some weight.

10.1.25 The changes to the following strategic policies and draft DPD's are relevant to this application:

Policy SP1: Managing Growth, raises Haringey's strategic housing requirement to 19,802 net new homes between 2011 – 2026 (rather than 8,200 between 2011-2026). The amended policy also elevates the Northumberland Park Area of Change to a Growth Area and renames it the 'North Tottenham Growth Area' which includes Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium, and High Road West). The number of new homes expected to be accommodated in the Council's Growth Area's (Haringey Heartlands/Wood Green; Tottenham Hale and North Tottenham) is also increased to 13,500 to 2026.

Policy SP2: Housing, is amended to reflect the increased housing target in SP1 and reduces the strategic affordable housing target from 50% to 40%.

Policy SP8: Employment, reduces the forecast demand of new industrial floorspace from 137,000 m<sup>2</sup> to 23,000m<sup>2</sup>.

### Draft Development Management Polices DPD

This document introduces a set of detailed planning policies which give effect to the Spatial vision for the borough. The DM DPD updates local thematic planning policies for the borough, superseding the 2006 Unitary Development Plan, and a suite of Supplementary Planning Documents and Guidance notes. It will be used in the determination of planning applications in the borough. The pre submission draft of the DM DPD was considered by the Council at its meeting on 23<sup>rd</sup> November 2015 and agreed for publication. The document can therefore be afforded some weight.

There are five main chapters in the document, each providing a set of policies covering the topics of Development and Design, Housing, Environmental Sustainability, Employment and the Economy, and Community Infrastructure. A substantial number of Policies are considered relevant to consideration of these applications reflecting changes in national policy as well as the outcome of the evidence based studies undertaken by the Council since the adoption of the previous plan. Amounting to a comprehensive suite of “development management polices” for the whole borough, and supplemented by the specific polices of the Tottenham AAP, the following are all considered to be relevant to the determination of the application:

#### Design & Character

- DM1 Delivering High Quality Design (Haringey’s Development Charter)
- DM2 Accessible and Safe Environments
- DM3 Public Realm
- DM4 Provision and Design of Waste Management Facilities
- DM5 Locally Significant Views and Vistas
- DM6 Building Heights
- DM9 Management of the Historic Environment

#### Housing

- DM10 Housing Supply
- DM11 Housing Mix
- DM12 Housing Design and Quality
- DM13 Affordable Housing

#### Environmental Sustainability

- DM19 Nature Conservation

DM21 Sustainable Design, Layout and Construction  
 DM22 Decentralised Energy  
 DM23 Environmental Protection  
 DM24 Managing and Reducing Flood Risk  
 DM25 Sustainable Drainage Systems  
 DM26 Critical Drainage Areas  
 DM27 Protecting and Improving Groundwater Quality and Quantity  
 DM29 On-Site Management of Waste Water and Water Supply

#### Transport & Parking

DM31 Sustainable Transport  
 DM32 Parking

#### Employment & Town Centres

DM37 Maximising the Use of Employment Land and Floorspace  
 DM38 Employment led Regeneration  
 DM41 New Town Centre Development  
 DM44 Neighbourhood Parades and other non-designated frontages  
 DM45 Maximising the Use of Town Centre Land and Floorspace

#### Community Infrastructure, Implementation & Monitoring

DM48 The Use of Planning Obligations  
 DM49 Managing the Provision and Quality of Community Infrastructure  
 DM53 Hotels and Visitor Accommodation  
 DM55 Regeneration and Masterplanning

The assessment of the application has had regard to these emerging policies.

#### 10.1.26 Urban Characterisation Study (part of the Local Plan evidence base)

- Published in February 2015 as an evidence base for Haringey's Local Plan documents, the Haringey Urban Character Study is not adopted policy but is a useful guide for assessing development. It is intended to provide an objective, thorough and analytical outlook of the borough. It identifies the components of local character and distinctiveness and highlights those aspects which make Haringey unique. It will guide decisions on the location, type and form of new, including the location of tall buildings. The study evaluates and builds upon the existing evidence base, including conservation area appraisals, Upper Lee Valley OAPF, Open Space Strategy and other relevant documents.
- In addition to being a formal evidence base to Haringey's planning documents, the study can be utilised as a general urban design reference document.

- The sensitive heritage asset of the High Road continues to make it unsuitable for buildings that would be out of character; a prevailing maximum height of 3-4 storeys with perhaps one or 2 recessed additional floors, should be followed in any new build sites, whilst care to protect, repair and reinstate existing 3-4 storey terraces should be taken.
- However the study states that the sole exception could be around the Spurs Stadium, where the existing stadium is equivalent to 7-8 storeys in height; it is expected a new stadium of equivalent or slightly higher height and associated development can be accommodated, and it is possible that as part of an agreed masterplan a similar height could be matched on development immediately to the east of the stadium, in the heart of the city block, and a similar distance from the High Road to the west, directly opposite the stadium. Care should particularly be taken though not to harm the character of Park Lane and Church Road.

#### 10.1.27 Other Relevant Publications/Documentation

In addition to the Development Plan the area has been the focus of considerable public sector attention over the last 10 years, which has culminated in the production of a number of non statutory publications prepared following significant community engagement.

#### 10.1.28 Upper Lea Valley Opportunity Area Planning Framework (SPG to the London Plan)

- The Upper Lea Valley Opportunity Area Planning Framework (OAPF) (2013) covers over 3,000 hectares of land covered by the London Boroughs of Enfield, Haringey, Waltham Forest and Hackney and was produced by the GLA. The OAPF sets out the overarching framework for the area which includes the Site. The objectives for the Upper Lee Valley are set out as follows:
  - Growth at Tottenham Hale, Blackhorse Lane, Meridian Water in Central Leaside and Ponders End.
  - Optimised development and redevelopment opportunities along the A10/A1010 Corridor, in particular the Tottenham High Road Corridor and Northumberland Park.
  - Over 15,000 new jobs by 2031 across a range of industries and a green industrial hub creating greater learning and employment opportunities.
  - Over 20,100 new well designed homes by 2031.  
Full integration between the existing communities and the new jobs, homes and services provided as part of the new developments.
  - A Lee Valley Heat Network linked to the Edmonton Eco Park.



- Significant investment and improvements to transport infrastructure, including four trains per hour on the West Anglia Main Line and improvements to help people walk and cycle more easily through the area.
- A fully accessible network of green and blue spaces which open up the Lee Valley Regional Park. The networks between them will be improved benefitting both people and wildlife.
- This site sits within the A10/A1010 corridor and in Northumberland Park. Tall buildings are promoted around the new Spurs stadium.
- The ambitions for the area are that it becomes a thriving new destination for north London, with a sports, entertainment and leisure offer supported by enhanced retail, workspace and residential development.
- In particular, the section relating to Tall Buildings highlights that the Mayor will promote the development of tall buildings where they create attractive landmarks enhancing London's character and help to provide a catalyst for regeneration.
- The OAPF proposes that future tall buildings will be in well-defined clusters in areas identified for urban growth including the new stadium for Tottenham Hotspur. By locating tall buildings in these area, the OAPF highlights that their impact on conservation areas and listed buildings will be limited.

#### 10.1.29 The Physical Development Framework for Tottenham (2012)

- The Tottenham Physical Development Framework (PDF) was produced by Arup in 2012 for Haringey Council and highlights the scale of the opportunities within the Borough. The document was not consulted upon or adopted by the Council as planning policy and as such has no weight in planning terms. In particular, Tottenham is noted for having good transport links, being a destination of choice due to the rich heritage, accessibility to parks including Lee Valley Park as well as being home to Tottenham Hotspur Football Club. As such, there are substantial development opportunities within the Borough.
- The Framework considers Tottenham as one of London's key areas for growth and regeneration. It is expected that prior to 2025, there will be 5,000 new jobs, 10,000 new homes and more than 1 million sq ft of new employment and commercial space. These figures include proposals for a new stadium at the Site and the PDF notes that this will act as a catalyst for change.

#### 10.1.30 The Tottenham Strategic Regeneration Framework (2014)

- The Tottenham Strategic Regeneration Framework (SRF) prepared for Haringey Council sets out the vision for the future of Tottenham by outlining the key strategies that will be used to revitalise the area.
- The SRF highlights that the Football Club along with regeneration proposals for High Road West are undergoing significant change to create new residential neighbourhoods supported by leisure and commercial developments.

- This document, alongside the PDF, has been used to inform the emerging Tottenham Area Action Plan which is discussed below.

- The application comprises a mix of new and replacement uses for the site, arranged around a new sports (primarily football) stadium. The proposed uses include a number of “town centre” uses (retail, office, food and beverage, Tottenham Experience, hotel), which in this case aim to support the significant influx of dedicated visitors attracted to the site to either watch the sporting and leisure events within the stadium or enjoy the stadium facilities on non event days. These uses are supported in principle, and are discussed further below, subject to further detailed considerations in the rest of the report.

- 10.1.31 The Urban characterisation Study (2015) highlights the mixed character of the surrounding area, some of which is a conservation area, and which contains some Listed Buildings. The characteristics of the conservation area and heritage assets within it do not prevent, as a matter of principle, new development from taking place. Indeed, the earlier permission demonstrates that replacing the existing stadium with new development can be acceptable in principle. This application has a different impact upon the heritage assets in the area and the proposal’s impact in this regard is considered later in the report.
- 10.1.32 Haringey’s Local Plan identifies the Site as part of the wider regeneration of Northumberland Park. As such, the Site is highlighted as being suitable for a variety of land uses. The specific land uses and redevelopment of the Site is set out clearly within the emerging Tottenham AAP which identifies the Site for comprehensive redevelopment as highlighted above. The area and site is also identified as an area for growth in both the London Plan and the Upper Lee Valley Opportunity Area Planning Framework.
- 10.1.33 As is set out above, the principle of the redevelopment of the stadium, and extensive development in the surrounding area is established in development plan policy and emerging planning policy for the area. The site lies within the OAPF as defined in the London Plan, and strong policy support for the regeneration of the area follows from this designation. The OAPF policy, as well as other London Plan policies, amongst other matters support high density development, including tall buildings within the area of the OAPF. The principle of each element of the proposal is dealt with below:

## **The Stadium**

- 10.1.34 Strategic Policy SP1 of the Local Plan promotes development in the Northumberland Park Area of change. The Council’s aspirations for Northumberland Park as set out in Chapter 3 of the Local Plan Strategic Policies

includes the 'provision of a mix of land uses including the redevelopment of the football stadium'.

- 10.1.35 London Plan Policy 4.6 'Support for and Enhancement of Arts, Culture, Sport and Entertainment' supports the continued success of London's diverse range of arts, cultural, professional sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors. Policy 4.6 also requires a sequential approach to be fulfilled, that development should be located on sites with good existing or planned access to public transport, be accessible to all sections of the community, and addresses deficiencies in facilities. The submitted Transport Assessment demonstrates that the new stadium is acceptable in transport terms, this is discussed in more detail later in the report. Given the club's long historic association with the site it is considered beneficial that it stays in the area. The proposed stadium also improves access for disabled visitors. Through the s106 agreement residents of Haringey and Enfield will be given first refusal on a proportion of tickets for all events, making the new stadium accessible to all sections of the community.
- 10.1.36 Proposed site allocation NT7: Tottenham Hotspur Stadium in the emerging Tottenham AAP supports the redevelopment of the existing football stadium in order to increase match day capacity along with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.
- 10.1.37 The provision of enhanced stadium facilities in this growth area is in line with regional and local policy and is accordingly acceptable in principle.

### **Tottenham Experience**

- 10.1.38 The Tottenham Experience will accommodate a wide range of club-related uses that are not considered to easily fall within any defined use class and include the following elements:
- Club Shop (1955 m<sup>2</sup>)
  - Ticket office & booths (242 m<sup>2</sup>)
  - Cafe (260 m<sup>2</sup>)
  - Roof walk reception and changing (100 m<sup>2</sup>)
  - Museum (728 m<sup>2</sup>)
  - Club cinema (400 m<sup>2</sup>)
  - Warmington House
  - Roof top terraces.
- 10.1.39 In the application the Tottenham Experience is defined a sui-generis use. While officers agree with this definition the mix of uses proposed are nonetheless of the type that you would normally find in a town centre. This is also the case with

some of the other proposed uses dealt with below. The concept of the Tottenham Experience is consistent with the site specific and area based aspirations set out in adopted and emerging policy. The appropriateness of the proposed mix of uses is dealt with below under a separate heading.

## **Extreme Sports**

- 10.1.40 London Plan Policy 3.19 'Sports Facilities' supports development proposals that increase or enhance the provision of sports and recreation facilities, as does Policy 4.6 'Support for and Enhancement of Arts, Culture, Sport and Entertainment'. Policy 4.6 also requires a sequential approach to be fulfilled, that development should be located on sites with good existing or planned access to public transport, be accessible to all sections of the community, and address deficiencies in facilities.
- 10.1.41 The Extreme Sports Centre will also increase access to sports and recreational facilities, with opportunities to develop activities directly linked to the curriculums of local schools and colleges. The application states that the Club is committed to agreeing community access to the extreme sports, allowing schools free use of the facilities. The number of days and the number of schools to which this offer will be extended will be subject to a community access plan to be secured by s106 agreement.
- 10.1.42 The Extreme Sports Centre will also work in combination with a range of sports and recreational uses that will operate from the podium public space to the north, including the multi-use games area. This will also contribute to London Plan Policy 3.2 'Improving Health and Addressing Health Inequalities' in an area that suffers from high rates of obesity and other health problems. The proposed sports and recreation facilities are supported in line with London Plan policies.
- 10.1.43 It is recognised in the Local Plan that the Tottenham area suffers from high levels of adult and child obesity, as well as other diseases the risk of which can be reduced through physical activity, such as cardiovascular disease. The provision of these new sports and recreational facilities, and importantly in a way that will be managed to secure access to local residents, will clearly assist with the objective of seeking to improve the health and well-being of residents. The development will improve the area's sporting and recreational facilities in accordance with Local Plan Policy SP15; and will assist with improving the health and well-being of the local population and therefore complying with Local Plan SP14. As such the proposal is acceptable in this regard.

## **Residential**

- 10.1.44 The approved planning permission (HGY/2011/2351) provided for 285 dwellings which were intended to generate cross-funding for the stadium. The applicant sets

out that residential development, remains an important form of cross subsidy within the current proposals. The emerging site allocation in the Tottenham AAP, makes provision for residential development amongst other land uses. The increased quantum of residential development proposed, responds to the growing need for new homes identified in the Borough by the London Plan, and through the emerging Local Plan and is welcomed. The good accessibility and proximity to the existing local facilities on Tottenham High Road, and to local schools also means that the site is considered to represent a sustainable location for new homes.. The impact of noise generating uses from the rest of the development is dealt with below in the report and the impact is considered to be acceptable subject to conditions. The provision of residential use is welcomed in this growth area, as it makes an important and valued contribution to meeting the Council's London Plan housing target.

### **Affordable Housing**

- 10.1.44 The London Plan through Policy 3.11 seeks to maximise affordable housing provision across London and seeks to provide an average of 17,000 more affordable homes per year up to 2031 and requires 60% of affordable housing to be for social and affordable rent and 40% for intermediate rent or sale.
- 10.1.45 London Plan Policy 3.12 notes that in negotiating affordable housing on individual private housing and mixed use schemes Local Planning Authorities “should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for reappraising the viability of schemes prior to implementation (‘contingent obligations’), and other scheme requirements”.
- 10.1.46 Haringey Council’s affordable housing policy is contained in Policy SP2 of the adopted strategic policies DPD (2013). This requires that the subject to viability schemes meet the 50% affordable housing borough wide target. The alterations to the Strategic Policies DPD, considered by Full Council in November, propose reducing this requirement to 40%, based upon evidence of development viability. The NPPF re-affirms the government’s commitment to ensure that obligations imposed by the planning process do not threaten the deliverability of sustainable development proposals.
- 10.1.47 The applicant has advised the Council that the viability of the development overall, and of the residential component of the development, means that it does not result in a surplus land receipt sufficient to enable the provision of affordable housing either within the development or by way of an off-site contribution. The applicant has submitted a viability assessment, prepared on its behalf, to evidence its position. In outlining the position with regard to current site viability, the applicant indicates an expectation that sales values (and hence the viability of the residential development) will improve in the future as the regeneration of the area becomes established alongside other investments. Accordingly, the

applicant proposes that a review mechanism be introduced to capture affordable housing contributions in the event that the development realises a positive land value greater than the value that the applicant argues is required to support the funding of the Stadium building.

- 10.1.48 Given the complexity of the funding arrangements required to deliver football stadiums in the UK, the Council together with the GLA, has appointed KPMG to provide expert, independent advice on development viability in this case.
- 10.1.49 KPMG has provided a report to the Council which confirms that the proposed development on the site does not exhibit a level of commercial return on investment that would enable the development to be wholly funded by mainstream lenders and banks – or be justified by the turnover of the existing football club alone. Instead, KPMG has identified a significant funding challenge associated with the stadium that will require other elements of the development (or other funding sources) to contribute towards improving the viability of the stadium project.
- 10.1.50 At the present time, and based upon the assessment of development costs and residential sales values in the area, the residential development is not able to make any contribution to the delivery of the stadium. This was not the case with the earlier planning permission where viability at that time meant that a residential cross subsidy was made possible. The principle of cross subsidy from the residential development contributing to delivery of the stadium has therefore previously been accepted as part of the earlier planning permission and continues to be acceptable in this case – given the significant policy support for delivery of a new stadium on the site.
- 10.1.51 Given the unique characteristics of the development funding “package” required in this case – to deliver sports led regeneration that achieves the strategic objectives for the site and the area - and the current lack of viability of the residential development, officers are satisfied that the applicant has demonstrated that delivery of affordable housing cannot be achieved at the current time.
- 10.1.52 In such circumstances, the NPPF and SPG to the London Plan recognise that the use of contingent obligations (based upon a review of viability at a later date) may be appropriate. Considerable dialogue has taken place between the applicant and the Local Planning authority on the details of the review process. The applicant’s consultants identify a range between 15 and 40% representing appeal inspectors’ determination of what a suitable ratio might be. In the case of the earlier planning permission for the stadium, that ratio was 24.7% - equating to an effective residential land value subsidy to the previous stadium of £22m.
- 10.1.53 In the intervening period, construction costs have risen. The new proposed stadium is also more expensive to construct. Residential sales values in the

locality have not kept pace with this rate of inflation – meaning that whilst the price of new homes in North Tottenham are increasing (and are already recognised as unaffordable for a number of existing residents), the rate of increase is not sufficient to cover the rising price of construction.

- 10.1.54 The cost and value of the proposed residential development forming part of the application will be greater than previously. The application of the same 24.7% ratio as agreed previously therefore equates to a current day value of £59.7m. In order for the residential development to achieve an indicative land value of this scale, a very significant increase in the sales prices achieved from the proposed residential units will be required – the precise figure being dependent upon the rate of construction costs inflation. Officers have considered, in the context of this revised scheme and the range of uses, whether the same ratio should be applied.
- 10.1.55 The financial appraisal of the stadium development indicates that the scale of the funding gap which the residential development could contribute to is significant. Officers support the principle that the residential development plays a meaningful “enabling” role in the delivery of the funding package for the stadium. However, officers also consider that the delivery of affordable housing is a corporate priority that should be afforded some weight. The financial appraisal of the proposal highlights the need for a range of funding solutions to supplement conventional funding for the project. The scale of the funding gap is significantly greater than any surplus from the residential development can fill on its own. On that basis, officers consider that the residential development can only make a contribution to (and not be entirely responsible for) filling the gap, and therefore the delivery of the stadium.
- 10.1.56 Having regard to the range of enabling contributions identified by the applicant’s consultants in their submission officers consider that a figure of 20% as opposed to 24.7% is appropriate and reasonable. This equates to a meaningful cross-subsidy (equivalent £48.4 million at today’s price) before further increases in residential values is shared between the Council and the applicant. Whilst still presenting a significant challenge, the revised figures are considered to be reasonable and justifiable in the context of the planning policy framework and taking account of RICS and GLA guidance.
- 10.1.57 The phasing of the project means that the residential development is not able to be carried out until 2020 at the earliest (following demolition of the existing stadium). Given the complexity of the buildings proposed, and the scale of development it is not expected that any homes would be able to be occupied on the site until 2020. This means that the likelihood that an affordable housing contribution will be derived from the development should be viewed as uncertain. Officers consider that the appropriate trigger point for the review is at full stadium occupation or at submission of reserved matters for the residential development whichever is the latter. The use of a review mechanism therefore represents an

appropriate safeguard to ensure that in the event of significant improvements in values in the period prior to the review, the policy expectations in respect of affordable housing arising from the new residential development are not avoided.

- 10.1.58 The applicant has suggested that in the event that the review of viability identifies that the development will secure such values, any income over that level is shared equally between the Council and the applicant (ie 50% of that value remains with the Club and 50% is payable to the Council up to a value equivalent to 50% affordable housing)– with the Council contribution being translated into a financial payment for the delivery of affordable housing at a location nearby. Although London Plan and Local Plan policy prioritises the provision of on-site affordable housing and then provision of off-site affordable housing over an off-site contribution, it is considered that an off-site contribution is appropriate in this instance given the likely form of the proposed residential units, the level of social housing already in the area and the fact that given the high construction costs of the residential development proposed, a larger number of units could be provided elsewhere with the contribution.

## **Education**

- 10.1.59 The Council works closely with the Greater London Authority (GLA) to project the number of pupils expected to need school places over the next 10 years. The Council then publishes its projections every year in the School Place Planning Report.
- 10.1.60 The GLA includes information from the Strategic Housing Land Availability Assessment (SHLAA) to ensure that we, as the Local Authority, are able to plan for school places for children who will be living in new housing in the borough in the future.
- 10.1.61 At primary school level (age 4-11) the Council plan to provide local places and to achieve this, the Council split the borough in to 5 place planning areas. The Site is located in place planning area 4. Current figures in the School Place Planning Report 2015 project that supply of Primary School places in the area will be sufficient until 2020/21.
- 10.1.62 Residential unit estimates that fed into the 2015 School Place Planning report took into account the 285 units currently consented for the site and not therefore the additional 300 units currently proposed.
- 10.1.63 The 300 units that were not included in this year's report will be included in the next report which will be published in July 2016. However, these units are not anticipated to be occupied until after 2021.



- 10.1.64 The Council plans for secondary school places as one planning area (the entire borough) and it is projected that there is a surplus of secondary school places until 2018/19. This need would arise prior to the occupation of the residential units.
- 10.1.65 The proposal would generate a child yield of approximately 41 children (based on the methodology in using the Mayor's SPG 'Shaping Neighbourhoods: Play and Informal Recreation'). 25 of these are predicted to be under 5, 9 aged 5-11 and 7 aged 12 plus.
- 10.1.66 Therefore, the current scheme, and specifically the child yield that would be generated from the scheme would require additional school places at both primary and secondary level when the residential units are occupied post 2021. The Council is in the process of identifying sites for additional school capacity in the area through the AAP process to accommodate this proposal and other regeneration schemes.
- 10.1.67 Local Plan Policy SP16 expects that where a development increases the demand for community facilities and services, a contribution towards providing new facilities or improving existing facilities is sought and that efficient use of community facilities is promoted.
- 10.1.68 Since the implementation of the Haringey CIL Charging Schedule (November 2014), financial contributions towards infrastructure are levied as a standardised amount for the quantum of new floor space dependant on the use. This money will be divided and spent on items on the Regulation 123list including social infrastructure, such as education.
- 10.1.70 The proposal is therefore considered to be acceptable and in general accordance with London Plan Policy 3.16 and Local Plan Policy SP16.

#### Hotel (Use Class C1)

- 10.1.71 The Development comprises 18,820 sqm (GIA) of hotel floorspace which will include 180 hotel bedrooms and 49 serviced apartments.
- 10.1.72 The proposed hotel would provide employment for up to 185 people. The Environmental Statement estimates that annual spend in the locality from hotel visitors would be some £560,000.
- 10.1.73 London Plan Policy 4.5 'London's Visitor Infrastructure' seeks to achieve 40,000 net additional hotel rooms by 2036, of which at least 10% should be wheelchair accessible, as well as recognising the need for serviced apartments. Policy 4.5 also states that outside the Central Activities Zone, new visitor accommodation should be focused in town centres and Opportunity and Intensification Areas, where there is good public transport access to central London and international

and national transport termini. Policy 4.5 also recognises that it may be appropriate to locate visitor accommodation near to major visitor attractions of sub-regional or greater significance where there is a clear link in scale, nature and location. As a site within an Opportunity Area, with good transport facilities and immediately adjacent to a major Stadium, the proposal to include a 180 bedroom hotel and 49 serviced apartments within the development is supported.

- 10.1.74 Saved UDP Policy CLT4 supports the provision of new hotels provided they don't result in the loss of housing and are either located within a town centre or well served by public transport. While not in a town centre the site is considered to be well served by public transport with forthcoming station and service upgrades at White Hart lane and Tottenham Hale stations. As demonstrated in the supporting Environmental Statement, the proposed hotel will not result in any significant adverse impacts on neighbouring amenity.
- 10.1.75 The provision of a hotel is also supported in the proposed site allocation NT7: Tottenham Hotspur Stadium, in the emerging Tottenham AAP, which the introduction of residential, commercial, education, community, leisure and hotel uses.
- 10.1.76 Hotel provision is also supported in policy DM53: 'Hotels and Visitor Accommodation' in the emerging Development Management Policies DPD with similar caveats to saved UDP policy CLT4.
- 10.1.77 The Tottenham SRF supports the creation of a "destination" in North Tottenham in order to capture additional consumer expenditure (in local businesses), and to raise the profile of the area in London and beyond.
- 10.1.78 The provision of a hotel on the site is also consistent with the extant planning permission (HGY/2010/1000) that confirms the acceptability in planning terms of accommodating a hotel on this site.
- 10.1.79 The proposals for serviced apartments is also considered to comply with the above policy however a condition limiting the period of occupation by an individual guest is included in the decision notice to prevent the serviced apartments from becoming authorised self contained dwellings without having regard to the appropriate residential standards or affordable housing policy.
- 10.1.80 Subject to this condition it is considered that the principle of a hotel use and associated serviced apartments accords with the relevant London Plan Policy 4.5, and Saved UDP Policies CLT4 and SSP13 and its provision is welcomed.

Flexible Business/Community Use (Use Class B1/D1)

- 10.1.81 The Development comprises a maximum of 4,000 sqm of flexible floorspace located within the plinth, beneath the residential towers at ground, first and second floors. At this stage, the proposed use of the floorspace is unknown and the applicant seeks flexibility for the space to be used for either, or a combination of, office (Use Class B1) and community (Use Class D1) uses. It is intended that the use will be defined at the reserved matters stage. This area has also been provisionally identified as the location for a future site-wide energy centre in the event that the proposed district-wide energy centre does not come forward. It is important to note that this does not form part of this application and would be subject to separate assessment and the obtaining of any additional consents as necessary.
- 10.1.82 In the event that the flexible floorspace is occupied by business floorspace, this would be supported by development plan policy. The London Plan seeks to develop and enhance capacity to support local activities (Policy 2.7). The provision of business space will help achieve the objectives of Policy 4.1, as it will ensure the availability in this part of Tottenham of flexible workspace, with suitable facilities provided elsewhere within the NDP scheme, that would be attractive to small and medium sized enterprises, including the voluntary and community sectors.
- 10.1.83 Haringey Local Plan Policy SP8 states the Council will secure a strong economy and support local employment and regeneration. Policy SP9 states that the Council will seek to address unemployment by increasing the employment offered in the borough. Saved UDP Policy EMP5 state that employment generating uses within and outside the Defined Employment Areas (which is the case for this part of the NDP site) will be supported provided that any trips generated by the proposal are catered for by the most sustainable and appropriate means.
- 10.1.84 The potential for the provision of new business floorspace as part of the Development will accord with the relevant Haringey development plan policies highlighted above. The business space provides the opportunity to increase employment opportunities in this part of Tottenham, which experiences high levels of unemployment. Furthermore, the floorspace will promote sustainable movement patterns, with limited car parking being provided in order that workers and visitors use the enhanced public transport and cycle network being delivered in the area and strengthen by this development.
- 10.1.85 Should the flexible space be occupied by D1 community uses, this would be in accordance with Local Plan Policy SP14, which supports the integration of community facilities and services in multi-use buildings. It also accords with Local Plan policy SP16 that supports the provision of multi-purpose community facilities. London Plan Policy 3.16 'Protection and Enhancement of Social infrastructure' also supports the provision of community uses.

- 10.1.86 Business and community use are both supported in the proposed site allocation NT5: Tottenham Hotspur Stadium in the emerging Tottenham AAP which the introduction of residential, commercial, education, community, leisure and hotel uses.
- 10.1.87 It is considered that the principle of flexible floorspace within the plinth building, whether used for business or community uses, or a mixture of both, accords with the relevant development plan policies and such uses are therefore acceptable and are welcomed.

### Community Health Centre

- 10.1.88 The outline element of the application includes a new community health building, Local Plan Policies SP14: Health and Well being states that the Council will seek to improve health and well-being in Haringey. This includes :Identifying appropriate sites for new health infrastructure including those in Haringey's growth areas and supporting the provision of new or improved health facilities.
- 10.1.89 Paragraph 7.1.13 of the Local Plan Strategic Policy Document recognises that in the 'North East Neighbourhood' (defined in the NHS Haringey Strategic Plan 2009 – 2014 and which includes North Tottenham there is an increased requirement for health and that this part of the borough experiences high levels of health inequalities.
- 10.1.90 London Plan Policies 3.16 'Protection and Enhancement of Social infrastructure' and 3.17 'Health and Social Care Facilities' both support proposals that provide high quality health facilities in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Policy 3.16 also supports the provision of community uses.
- 10.1.91 The principle of a new community health centre accords with the relevant development plan policies and is supported. Should the health facility not come forward for this site the use of this element of the site for an alternative D1 use would also comply with policy.

### Overall Mix of Uses

- 10.1.92 The site is not within a defined town centre but part of the site is within a local shopping centre and lies immediately to the south of a large food superstore. Angel Edmonton, designated as a District centre, lies approximately 500 metres north of the site, and Bruce Grove town centre, designated as a District centre, lies approximately 700 metres to the south of the site. The site cannot therefore be defined as edge of centre. However, it is recognised that the High Road to the

north and south of the site, as well as the west side of the High Road adjacent to the site, is lined by a mix of ground floor retail space and town centre uses such as Council Offices, Tottenham Sports Centre and a Public Library and a large food superstore is adjacent to the site.

- 10.1.93 The proposal includes a large area of uses that may normally be classified as town centre uses, including the 4,311 sq.m. 'Tottenham Experience' facilities (including retail, cafe and cinema space) identified in the application as 'Sui Generis'; up to 2,000 sq.m. of D2 leisure floorspace in the 'Extreme Sports Centre'; and up to 4,000 sq.m. of flexible space, which may comprise B1 business space or D1 non-residential Institution floorspace.
- 10.1.94 In line with the National Planning Policy Guidance the sequential test does not apply as the uses are in accordance with Development Plan policy. In any case the uses, given that they are essentially ancillary to the stadium/leisure use, are not considered to have an impact on the surrounding retail areas.
- 10.1.95 The Tottenham Retail Impact Assessment undertaken on behalf of the Council to inform the evidence base to the Local Plan by GVA/Bilfinger (2015) suggests that the overall effect of policy changes within the emerging Area Action Plan will be to support existing established town centres. The assessment contemplates the scale of development proposals forming part of this application within the assessment methodology from which these conclusions were derived.
- 10.1.96 The site benefits from good transport connections, which will be improved further following upgrades and enhancements to services and station facilities at White Hart Lane and Tottenham Hale, which are due to be delivered by 2018.
- 10.1.97 The proposals are therefore in line with national, London Plan and local policies and are acceptable and welcomed.

## **10.2 REGENERATION**

### **Overview**

- 10.2.1 The application site falls in Northumberland Park Ward. Northumberland Park Ward is rated as the third most deprived ward in London, and one of the 2-3% most deprived wards in the Country (ranking 87<sup>th</sup> out of 7669 nationally) in the indices of multiple deprivation 2015. White Hart Lane is the second most deprived ward in the borough, ranked 124<sup>th</sup> most deprived ward in England and 5<sup>th</sup> in London. In respect of employment deprivation, Northumberland Park is the second most deprived ward in London and 190<sup>th</sup> nationally.
- 10.2.2 The Councils data indicates that life expectancy amongst males in the ward is the lowest in the borough (significantly lower than wards in the West). The health

watch report considered by the Cabinet in 2014 indicates that access to and the quality of primary health services in Tottenham (including Northumberland Park) requires significant improvement.

- 10.2.3 The applicant sets out that the proposals build upon the aspirations indicated in the “Plan for Tottenham” and the “Strategic Regeneration Framework” to create a new leisure destination in North Tottenham, focused around the stadium complex. The Environmental Statement suggests that the economic impact of the stadium and related development will bring about a significant increase in visitor numbers which translates into a increase in spending within the wider local area estimated to be £22m per year primarily in services such as hospitality and food and drink.

### **Development Framework for North Tottenham**

- 10.2.4 The London Plan has identified the area as part of the Upper Lee Valley Opportunity Area. The Opportunity Area Framework, prepared with the Boroughs of Enfield, Hackney and Waltham Forest promotes the creation of 10,000 new jobs and 15,000 new homes in the area. London Plan policy 2.13 and 2.14 supports the delivery of the opportunity area objectives for the area of Northumberland Park. Meanwhile, Policy 3.19A promotes a sporting legacy for London post 2012, encouraging participation in sport and physical activity – particularly in areas with historically low levels of participation.
- 10.2.5 The key diagram to the adopted Strategic Polices Local Plan Document (2013) identifies the area as a place for growth and change. Although changes to the document have been agreed for publication at Regulation 19 stage the objectives and spatial (growth) strategy remain unchanged.
- 10.2.6 The Tottenham Area Action Plan, also agreed for publication at Regulation 19 stage, outlines a spatial strategy for North Tottenham that includes:
- “In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area’s reputation as a premier leisure destination within North London.”*
- 10.2.7 The AAP also highlights the role that the Tottenham Hotspur FC development scheme plays as a catalyst for wider area change through a substantially improved local centre with a balanced mix of quality homes, jobs, community

and leisure facilities and sets as a clear objective: *“To create a new leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area whilst celebrating the High Road’s rich heritage.”* The application site is the subject of a specific site allocation (Policy NT7).

10.2.8 The NPPF sets out the government’s definition of sustainable development. This includes consideration of economic, environmental and social effects and a presumption in favour of “sustainable development.” By way of the Localism Act 2011, Local Planning Authorities are now obliged to consider the economic effects of development.

10.2.9 In March 2014, following a significant consultation exercise (the results of which were summarised in the report “Tottenham Future”) Haringey Council adopted a Strategic Regeneration Framework. The framework set out a new vision for the area:

*By the age of twenty, a child born in Tottenham today will have a quality of life and access to the same level of opportunity that is at least equal to the best in London.*

10.2.10 The Strategic Regeneration Framework (SRF) sets out “seven strategies for success:”

1. World-class education and training – including new schools, better access to apprenticeships and more Tottenham young people attending university;
2. Improved access to jobs and business opportunities attracting major investment and encouraging local business growth to boost employment;
3. A different kind of housing market – improving existing homes and building new, high-quality homes to meet demand at a range of prices and tenures;
4. A fully connected community with even better transport links – continuing to improve rail, Tube and bus links, including making the case for Crossrail 2, as well as opening up Tottenham to more walking and cycling routes;
5. A strong and healthy community – improved healthcare facilities, reduced crime and strong social networks for young people;
6. Great places – putting Tottenham’s character and heritage centre-stage while creating better public spaces to meet, shop and have fun;
7. The right investment and quality development – building partnerships and securing money to achieve these priorities with a focus on high quality design.

10.2.11 The SRF included a Delivery Plan with a focus on four priorities in the short to medium term to deliver the aspirations within the SRF and reflecting the aspirations collected through the ‘Tottenham’s Future’ engagement programme:

1. People: To deliver improved access to jobs and business opportunities; world-class education and training; and a strong and healthy community;
2. Place: Better caring for the place and delivering improved public realm in all of the local centres that comprise Tottenham;
3. North Tottenham including High Road West, a new stadium/leisure destination and a comprehensive estate regeneration and housing renewal programme; and
4. Tottenham Hale: a key area of opportunity in South Tottenham, building on the delivery of a new station and a range of mixed use development.

10.2.12 The strategy sets out a range of targets, including the delivery of up to 10,000 new high quality homes and the creation of over 5,000 new jobs and 1million sq ft of employment and commercial space by 2025.

### **Contribution of the Development to Regeneration**

10.2.13 The Environmental Statement estimates that the construction phase of the development would create 356 construction jobs per year. Over a four year construction period this is equivalent to 890 Full Time Equivalent jobs. The existing stadium employs 125 administration staff and some 67 retail and distribution staff with an additional 570 staff on match days. The application suggests that the proposed new stadium would provide an additional 100 FTE roles at the site with another 330 additional match day staff (on top of the 570) due to the increased capacity and higher levels of catering and hospitality provided. This is a material increase in staff over the previously consented proposals.

10.2.14 In addition to the stadium roles, the ES has estimated the number of proposed roles arising from the services provided within the other components of the development. These amount to 185 FTE roles for the hotel, 125 FTE roles for the Tottenham Experience 25 FTE roles for the Extreme Sports building and between 55 and 265 FTE jobs within the community/office space in the southern podium. No figure is provided for the health building in the North East Corner of the site. Overall the proposals are considered to generate at least an estimated 490 FTE (and up to 700 FTE if the flexible floorspace is B1) jobs on non match days and around 330 additional (900 overall) part time roles on match days. The effect of these additional employees spending money in the local community is estimated at up to £950,000 (407 employees spending £10.49 per day). The ES indicates that the catchment for such roles has a strong fit with the local labour market and concludes that this amounts to a major beneficial effect at the local level.

10.2.15 The proposed events strategy for the site would see visitor numbers for football matches increase by up to 700,000 visits per year. Assuming that some supporters spend money outside the ground (the club suggest research that indicates about 60% of visitors will do this), the estimates of additional spending



in the area (using £2 - £10) equating to between £0.8m – £4.2m per year spent locally. If a more optimistic estimate of local spend is made, this figure has scope to increase further (using Brentford FC application metric of £17 per day), the ES estimates this being up to £7.5m pa.

- 10.2.16 The club has, separate to this application, recently commissioned the accountants Deloitte to assess the wider impacts of spending in the locality of the existing ground – and to forecast additional economic benefit that might arise from the development.
- 10.2.17 For non football matches, including NFL and Concerts, the Deloitte report suggests an additional 10 major (60,000 seat) events generating some £14.4m from 600,000 additional visitors whilst the 6 concert events (with a theoretical capacity of 55,000) would add a further 330,000 visitors and £0.7m – £8m in the wider impact area (defined as Haringey, Enfield and Waltham Forest).
- 10.2.18 The conferencing and banqueting capabilities within the stadium are estimated to provide a capacity for up to 81,180 delegate days which could be provided within the stadium that in turn would generate up to 24,540 overnight stays at the hotel. The ES provides some optimistic forecasts for the rooftop walk, but overall estimates of the combined rooftop and Tottenham Experience visits are between 45,000 and 96,000 per year. This, they suggest would generate a further local spend of up to £2.4m. The stadium tours currently generate some 18,500 visits per year to the stadium.
- 10.2.19 The hotel and extreme sports centre are, together expected to generate an additional 153,000 visits (53,000 for the hotel) and between £200,000 and £2.4m of spend locally.
- 10.2.20 Whilst the viability assessments and anticipated sales values required (translating into purchase prices) mean that the contribution of the residential development to meeting local housing need is likely to be modest (a point made by those commenting on the application), the occupation of the residential development is considered likely to give rise to an increase in local spend by residents.
- 10.2.21 Representations received, following consultation on the planning application, have referred the Council to the 2015 report of the London Assembly “the Regeneration Game” into stadium led regeneration. The report acknowledges that although the hard evidence for a positive economic impact is still lacking, the arrival of a well-known club, or the expansion of an existing stadium, can change people’s views of the area, increasing local pride and encouraging newcomers to set up homes and businesses. The report recognises that *“Football clubs have a responsibility to ensure that the local community gains from a new stadium. Communities must benefit from new mixed tenure housing, and improved*

*transport links and connections across the area. Local authorities must also capitalise on opportunities to guarantee that clubs and other incoming businesses prioritise the local workforce when sourcing new employees.”* It should also be noted that in this case there is an existing stadium on the site.

- 10.2.22 Alongside the profound physical changes to the appearance of the area arising from the scale and form of the development proposed, the applicant has highlighted how the application provides for the restoration of heritage buildings comprised within the Northern terrace (as part of the mitigation for the loss of previous heritage buildings associated with the earlier planning permission).
- 10.2.23 The applicant is in parallel to the application, finalising proposals to extend the reach of the Tottenham Foundation activities through two new potential programmes; the “Tottenham Together” program and the “Percy House Future Skills Hub.” Over the last year, the applicant sets out that the Tottenham Foundation has spent £2.9 million on programmes that have engaged some 10,000 individuals on 50 programmes including employment, training and apprentice programmes, physical health and wellbeing and community safety. This, the charity calculate, achieves a social cost saving (defined as the costs avoided as a result of the interventions made) equivalent to £20.5m in the local community.
- 10.2.24 The Tottenham Together programme would focus on using the podium area, and spaces within and beyond the site, to build upon existing projects that deliver a range of social cohesion and health & wellbeing outcomes. This could include using the podium to provide activities, including a wide variety of sports sessions that in turn signpost individuals on to positive employment, educational and personal development pathways. The programmes help build safer, stronger, more respectful communities through the development of young peoples' potential, getting to youngsters who had previously proven harder to reach and guiding them towards a range of healthy and constructive activities. The project also provides an opportunity to build upon existing work within communities to improve the opportunities to access health promoting programmes using the podium to deliver a diverse and inclusive programme of activities that are based around the factors known to influence the health of individuals, including background, lifestyle, economic and social conditions.
- 10.2.25 The Percy House Future Skills Hub would be focused around the potential re-location of the Foundation to Percy House (located in the grade II\* building that forms part of the north western terrace) the programme will have an Employment and Skills Focus. The Future Skills Hub is proposed to be a community enterprise, employment and skills based centre located at the heart of the regeneration of North Tottenham and delivered by The Foundation. The hub will create job, traineeship and apprenticeship opportunities, teach skills linked to the development itself, e.g. heritage skills, and up skill local people to access the

job market. The long term, and in some cases (for example Heritage) specialist, components of the construction and operation of the site provide opportunities for career pathways to be developed for those on the scheme to impact positively on some of the most disadvantaged sections of our local community including those with a disabilities. These programmes are not proposed to be specifically secured through the S106 agreement however the application is conditioned such that a local employment strategy needs to be submitted and approved by the Council which will cover both construction and post construction employment opportunities.

- 10.2.26 The emerging public sector Health and Wellbeing strategy 2015-18 emphasises the importance of increasing healthy life expectancy particularly in the East of the borough. In addition, the Health in All policy calls for building healthy environments to promote and enable healthy living choices (through sport and recreation) and creating an environment that supports healthy living.
- 10.2.27 Haringey Council's Corporate Plan provides overarching objectives focusing on preventing ill health, promoting safe and sustainable communities and promoting growth and regeneration through housing and economic development activities. The Tottenham Programme, expressed in the Strategic Regeneration Framework, is one of 5 transformation projects.
- 10.2.28 The regeneration benefits of the proposals clearly align with, and reflect, aspirations and site specific requirements which, notwithstanding the report of the London Assembly on the Regeneration Benefits of Football stadia, reflect local aspirations derived through the Tottenham Futures consultation and which are set out in the adopted, emerging and non statutory plans and strategies covering the area – including the Council corporate plan. These documents consistently reflect the importance attached to securing additional employment, expenditure and community infrastructure within the locality – both to facilitate programmes and activities provided by the Council and other services, and to support and underpin local business viability and opportunities.
- 10.2.29 Whilst therefore the submitted viability assessments demonstrate that the proposals are unlikely to significantly impact upon affordable housing need within the existing ward given the limited scope for the development to contribute to affordable housing delivery off site, the scale of development will nevertheless provide a significant number of new homes that will help to meet London's wider housing needs in the future. In addition, the scale, duration and content of the development, subject to the measures to be secured through a s106 agreement to maximise local employment and procurement, and support construction and service based training programmes, will present opportunities for a significant and direct improvement in the economic wellbeing of the area. Other elements of the development, notably the health and community uses, provide infrastructure that will enable the Council and its partners to positively impact upon the health

and wellbeing of North Tottenham. The application has also highlighted how the new facilities and on site amenities will enable further expansion of the work of the Tottenham Foundation through a range of health and community safety programmes that they deliver with partners.

- 10.2.30 Whilst it is impossible to precisely quantify the regenerative impacts (both in financial and non financial terms) of a development of this magnitude it is estimated that 890 construction jobs, between 820-1030 additional jobs post construction and at least £19.45 million contribution to the local economy per year. The configuration and mix of uses and resultant employment opportunities (partly associated with some 2 million plus additional visitors to the area) is, together with the scale and duration of the investment, considered likely to result in significant, transformative economic, social and physical change in the locality.

### **10.3 DESIGN AND VISUAL IMPACT**

- 10.3.1 The response of the proposals to the site context, and the further studies undertaken since the previous grant of permission for the stadium have translated into a new masterplan for the site incorporating both new uses and buildings (and public spaces) and significant changes to the football stadium itself. The assessment of the visual and townscape impacts of the developments as a whole concludes that the design proposed is acceptable on wider views and townscape and officers agree with this conclusion. The detailed design considerations relating to individual elements within the application is considered further below.
- 10.3.2 The planning application is accompanied by a Design and Access statement which explains the design evolution process that has been followed to create the new master plan for the site. The statement sets out the design team approach to the site context and the design rationale and explains how the design responds to the opportunities and challenges present. The design and access statement, together with the Environmental Statement, assesses the impacts of the chosen design on the local and wider landscape, the historic environment, ecology, local micro-climate conditions and on surrounding properties.
- 10.3.4 The Design and Access statement seeks to explain how the significant scale, and anticipated impacts, of the masterplan will complement the characteristics of the existing area whilst at the same time, engaging with the wider aspirations for the North Tottenham area.
- 10.3.5 The Design and Access statement and Environmental Statement also set out the crowd safety rationale that inform the application proposals for the demolition of the three locally listed buildings on the High Road, and contain an options assessment (within the ES) that provides a comprehensive assessment of

alternatives to demolition to satisfy the requests of Historic England and the Council.

## Design Policy

- 10.3.6 The Council insists on high quality design. In accordance with government guidance in paragraph 64 of the NPPF, the Council will not accept design that is considered inappropriate to its context, or which fails to take opportunities to improve the character and quality of an area and the way it functions. SP11 and SP12 set out the Council's approach to ensuring that design in the borough is of the highest possible quality as well as being sustainable and conserving the borough's heritage. SP11 sets out the Council's general policy on design, which is that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. The impact of the scheme on heritage is dealt with later in this report.
- 10.3.7 Policy AAP 6: 'Urban Design and Character including Tall Buildings' of the emerging Tottenham Area Action Plan deals with the issue of tall buildings and urban character. It establishes the principle that building heights need to respond to the existing street hierarchy. It asserts that buildings should be taller on main streets and within town centres and decrease gradually as you move away. This is considered a key component in creating legible neighbourhoods and places which is a key objective of the Tottenham AAP. This approach is also in line with Policy DM6 of the draft Development Management DPD.
- 10.3.8 AAP 6 states that taller buildings will be appropriate along (parts of) Tottenham High Road. The appropriate height of development sites within Tottenham will be guided by the principles in Local Plan Policy DM1, and DM6, the reorientation of Tottenham Hale from an urban to a central area, the policy below, and the Site Allocations included in the Neighbourhood Areas Chapter.
- 10.3.9 DM1 of the emerging development management policies DPD contains the "Haringey Development Charter. This seeks to ensure that new development meets a number of requirements:
- All development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
    - a. Relate positively to neighbouring structures, new or old, to create a harmonious whole;
    - b. Make a positive contribution to a place, improving the character and quality of an area;
    - c. Confidently addresses feedback from local consultation;

d. Demonstrate how the quality of the development will be secured when it is built; and

e. Are inclusive and incorporate sustainable design and construction principles.

10.3.10 The policy is accompanied by a suite of design standards covering the character of the development, privacy and amenity considerations and landscaping. DM2 seeks to ensure new developments are safe and accessible and promote wider use by everyone. DM3 provide a policy framework for the delivery of public art within the public realm and for the creation of accessible and well managed private open space within development. DM6 'Building Heights' expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms. It states that tall buildings will only be acceptable in areas identified on Map 2.2. The Map identifies the North Tottenham Growth Area as one of the three areas in Haringey (along with Wood Green and Tottenham Hale) as being suitable for tall buildings. In addition DM6 states that tall buildings should also act as landmarks, identifying locations of civic importance, major public transport interchanges, and areas of high visitation. They should also be elegant and well proportioned, and visually interesting when viewed from any distance or direction; and positively engages with the street environment.

10.3.11 Good design is also central to all objectives of the London Plan and is specifically promoted by the policies contained within chapter seven, which address both general design principles and specific design Issues. London Plan Policy 7.1 sets out a series of overarching design principles for development in London. Other design polices in this chapter and elsewhere in the London Plan include specific design requirements relating to maximising the potential of sites, the quality of new housing provision, tall and large-scale buildings, built heritage, views, and the public realm. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (Policy 7.4).

### **Townscape and Visual impact assessment**

10.3.12 The proposals include buildings of considerable scale and height. The revised siting and size of the stadium and the hotel, extreme sports and residential elements of the proposals will be visible in both local and more distant views of the area from a range of viewpoints. The Environmental Statement accordingly includes a landscape and visual impact assessment which explains:

- the loss or damage to natural and built features and the perceived change to the character of the townscape resulting from the Project
- the capacity of the townscape to accommodate the type of Project;
- the extent to which the Project would be visible; and

- where visible, assessing how the view would change in relation to a range of visual receptors.

- 10.3.13 The assessment follows the approach recommended in the Guidelines for Landscape and Visual Impact Assessment by The Landscape Institute and Institute of Environmental Management and Assessment and broadly follows the same methodology employed for the first planning applications in 2010 and covers both construction and post completion phases.
- 10.3.14 The townscape assessment comprises a description of the underlying topography and broad characteristics of the built environment and the impact that the Project would have on this character. It assesses the effect on the various components, which contribute to the overall urban environment such as buildings, townscape and visual characteristics, within a defined local urban area surrounding the site up to 1km from the Project Site. The assessment also has regard to the cumulative effects of the development with other developments. The existing permitted development for the stadium forms part of the baseline conditions for the assessment.
- 10.3.15 The physical boundary for the townscape study was established by walking and driving throughout the locality and establishing appropriate edges. Officers have considered and agree with the appropriate extents of the study area as follows:
- To the north: Up to Bridport Road, Shaftesbury Road and Brantwood Road;
  - To the south: 200m south of Junction of Bruce Grove with High Road;
  - To the west: Bruce Castle Park and Tottenham Cemetery; and
  - To the east: Watermead Way.
- 10.3.16 The methodology for the townscape assessment has been drawn from some of the terminology and guidance found within two further documents:
- CABE By Design (May 2000); and
  - Guidance on the Methodology for Multi-Modal Studies (GOMMMS).
- 10.3.17 The visual assessment undertaken for the 2010 application identified 30 viewpoints. The assessment for the current application uses the same viewpoint locations, to assist with the comparison of the consented scheme and the current Project. The assessment also includes 7 additional viewpoints prepared as part of the heritage assessment of the proposals. Assessment of the predicted views was assisted by the use of 3D modelling, wireframes, photomontages, and elevations of the proposals. This has led to the production of a series of wireline Accurate Visual Representations (AVRs) and photorealistic AVRs which are incorporated into the ES. Very long distance viewpoints have also been assessed from key areas of open space, including Alexandra Palace (Viewpoint 1), Parliament Hill (Viewpoint 2), Greenwich Park (Viewpoint 3), and Finsbury Park (Viewpoint 30). Only from Alexandra Palace can the existing stadium be viewed

as an element within the view, and this as a barely discernible feature in a much wider panoramic view.

- 10.3.18 The Council has adopted Supplementary Planning Guidance (SPG) 1c Strategic Views. The SPG provides detail on the protection required for the strategic views between St Paul's Cathedral and Alexandra Palace. It identifies four zones of the strategic view for protection: the Viewing corridor; the wider setting; the mid-ground; and the foreground. The application site falls outside all four of these zones.
- 10.3.19 The ES assessed a number of townscape and visual effects including from Bruce Castle Mixed Open Space and from Tottenham Cemetery and Bruce Castle Park. The most noticeable long distance view to be affected would be from Alexandra Palace. The ES therefore concludes that "Overall on balance the Project would create a notable enhancement to the townscape character and views by providing a well-defined and formed built character and public realm, through high quality architecture and materials. The Project would create a unity and coherence of built character, whilst also providing visual diversity. The changes are seen as an important element in the proposed vision for the wider townscape regeneration of the locality."
- 10.3.20 The development will increase the visibility of the site in more distant views and the site will become a more visible/obvious components of views from a number of local viewpoints. The conclusions of the applicant's assessment on views is accepted by officers. The project will result in profound change to the appearance of the site in surrounding streets, which when considered in the round is positive. The physical impacts of that on amenity are considered separately (as are the impacts upon microclimate). The proposals reflect the scale and extent of ambition for the area contained within the adopted and emerging policy for the area and the potential impact is recognised and reflected in the quality of the proposed architecture, in accordance with adopted and emergent design policy requirements.

### **Crowd Safety**

- 10.3.21 The Club has identified what it believes to be a fundamental crowd safety problem with the current 36,000 capacity stadium and with the existing planning permission for a 56,250 capacity replacement stadium. This is caused by the narrow stretch of footway in front of the three locally listed buildings, the former White Hart Public House (750 High Road), the Edmonton Dispensary (746 High Road) the Red House (748 High Road) which at its narrowest creates a 1.9m pinch point. This results in the pavement in front of these buildings not being able to safely accommodate the large crowd flows along this part of the High Road on match days resulting in people spilling out on to the road and bus lane.



- 10.3.22 In the consented scheme these three locally listed buildings are retained. The design approach at that time was to create a pedestrian route around the back of the three locally listed buildings and the Grade II Listed Warmington House that was intended to take most of the spectator flow off the High Road. However when the new Stadium design team came to review the scheme crowd flow analysis, using more sophisticated software than was available at the time of the previous application and CCTV footage, it revealed that the natural desire lines and high pedestrian flows on match days would mean significant number of spectators would continue to use the narrow pavement in front of the listed buildings and move out into the highway. It is understood that this puts in doubt the ability of the club to obtain a safety licence for the consented stadium.
- 10.3.23 The applicant (through expert consultants) has undertaken a study of various options to address this issue without having to demolish the three locally listed buildings. These options range from intensive stewarding, temporary closure of part or all the High Road, permanently narrowing the High Road to extreme measures such as building elevated footways. All alternative options were dismissed for reasons relating to the impact of road closures on traffic; because they were actually more harmful in heritage terms; or because they simply did not produce the required improvements to crowd safety.
- 10.3.24 The Council has commissioned its own independent review of the various alternative options. The review fully supports the conclusions of the Club's own consultants. The Clubs crowd safety option is attached in Appendix [xx] of this report as is the Council's independent review.
- 10.3.25 The conclusion of officers is that a genuine crowd safety problem exists and that this is a highly material consideration in assessing the scheme. The only other potential option that is presented in the options appraisal is to close the High Road for fairly prolonged periods. This would be highly disruptive for the operation of buses across North London for prolonged periods and this is not considered to be feasible and as such has been discounted. Provision of a safe environment is supported in Local Plan Policy SP11 'Design', Saved UDP Policy UD3 'General Principles' and emerging Development Management Policies DM2 'Accessible and Safe Environments'. London Plan Policy 7.2 'An Inclusive Environment'. As such the current design is supported by Officers.

### **Quality Review Panel**

- 10.3.26 Haringey's recently established quality review panel has considered the development proposals on two separate occasions [once for a pre-application in July 2015 and once following submission in October]). The panel's comments are reproduced in full in the appendices; extracts from the panels review in October are nevertheless also reproduced below:

*The panel is supportive of the design of the stadium building, and welcomes the improvements that have been made since the last review, concerning the fluidity and visual coherence of the different facades.*

*“The panel welcomes the level of detail in the design of the public realm, however they feel that the design of the podium-level public space requires further refinement in order to deliver comfortable, welcoming places. The panel have concerns about the visibility and viability of the public space as a destination.*

*The panel recognise the long-standing need for a community health building, and supports the scale of the proposal for the building, but feels that access and layout issues require further consideration.*

*The panel supports the use of cast iron in the façade of the Tottenham Experience, but feels that its success will depend on the quality of the detailing and the articulation of visual rhythms that reflect the proportions of Warmington House.*

*The panel broadly supports the design of the hotel, and feels that the elevational treatments are exciting. Further consideration of the public realm at the entrance would be welcomed, as would the introduction of a canopy to reduce negative wind effects from the tower above.*

*The panel accepts the broad scale and indication of quality of the extreme sports building, but has concerns over the viability of the use, and would like to see more detail concerning the proposals.*

*Whilst the panel broadly supports the scale and level of detail of the residential section of the development, they strongly advise the Council not to accept an outline planning application for the residential tall building on such an important and prominent site. There is a risk that the scheme may be ‘dumbed down’ in design quality once the principle of development has been established.*

## **Stadium**

- 10.3.27 Although an extremely large building in its own right and in relation to much of its surrounding context, the new proposals have to be seen in the context of the existing consented scheme which set the principle for a building of this size at this location. A replacement stadium is also supported by Site Allocation TH7 in the emerging Tottenham AAP.
- 10.3.28 The new proposal is considered by officers to be a bolder and more interesting building than the existing consent. The sculpted appearance of the structure and its interaction with the high road and Worcester Avenue through new bold glazed elements and the way in which the building engages with the street (especially

the High road) are considered to be significant enhancements over the consented development. The building is larger than the consented scheme but treatment of eaves and edges within the asymmetric shape mean that the scale and impact of the building in views from near perspectives will be substantially similar. The proposed cladding of the Stadium is primarily a light coloured metallic mesh wrap which gives the stadium a sculptured appearance and will be more subtle than the previous panels proposed.

- 10.3.29 The design of the stadium is also driven by a desire to provide one the country's finest visitor experiences. This reflects the aspiration and ambition of the Football Club (shared by the Council through its strategies including emerging local plan) to create a premium sporting and visitor destination in London. The internal configuration of the stadium, for both fans/visitors and sport is considered to reflect this aspiration and will provide a quality of experience consistent with the finest sporting venues in the Country. The ambition – reflected in the design – to use the stadium throughout the week and year is reflected in the provision of elements of open glazing – providing views into the internal workings of the building and making for a much more visually interesting and engaging building within the high street during the daytime and evening.
- 10.3.30 Officers therefore consider that the proposed stadium design is of high quality with the potential to become an iconic structure within the area and more widely. The Quality Review Panel has observed that the proposals have design merit. In recognising its potential contribution to the area, they have nevertheless made a number of detailed comments on the specific components of the development. And have questioned the proposed external “elevator box” located on the High Road elevation. Conversely, the GLA in its Stage 1 report sets out that the projecting glazed escalator box on the western elevation has the potential to enliven the facade. The purpose of the glazed escalator box is to provide an opportunity for activities within the building to enliven the High Road. It is an obvious and deliberate component of the design that helps to mark the entrance to the building and engage with the linear form of the High Road. The differing views of the GLA and QRP are noted but officers are satisfied that the quality of the stadium building and the impact that this element of the design has on the street and the character and appearance of the conservation area is acceptable.

### Tottenham Experience

- 10.3.31 As discussed above, the scheme proposes to demolish the three locally listed buildings; retaining the grade II listed Warmington House and incorporating it into what is described as a new terrace of a similar height to Warmington. While it may have an appearance of a three storey terrace when viewed from the High Road ‘the Tottenham Experience’ is part of larger building conjoined with the southern podium and plinth.

- 10.3.32 The terrace is either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this ‘two storey’ structure would be the same height as the listed building itself. To the rear, is an atrium connecting the rear of the building to the southern podium ‘public square’. The works would restore the listed building, including repair works on all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum.
- 10.3.33 Notwithstanding concerns discussed in the Heritage section of the report over the loss of the three locally listed buildings, officers consider the proposed Tottenham Experience to be a bold and attractive building. The relationship with Warmington House has prompted differing views. The QRP considered that if demolition of the locally listed buildings were justified, the proposed design of the Tottenham Experience building was acceptable – subject to the applicant addressing the linearity of the ground floor elevations. The glazed link between Warmington House and the new, contemporary face of the Tottenham Experience (and the separation of these elements) is considered appropriate by planning officers– notwithstanding the differing view of the Conservation officer. The deliberate contemporary form and materials for the elevations to the building will form the backdrop to a busy public space (on match days especially) and represents, an appropriate and high quality response that also helps to mediate the change in scale to the rear – between the High Road and the stadium and podium buildings beyond.
- 10.3.34 The proposals provide an active and interesting building frontage to the High Road and will amount to a high quality, contemporary built form that is considered to be an appropriate and acceptable response to the context and design challenges associated with the site.

### Hotel

- 10.3.35 The GLA in its Stage 1 report were concerned that the design of the hotel as a ‘*glass-clad curtain walled building*’ would appear out of context with the High Road Conservation Area, but that it did help to visually distinguish the building and its use and that it related well to the new Stadium. They were also of the view that the hotels ‘blade’ shape provides ‘*an interesting visual contrast to the rounded massing of the lower-rise Stadium*’.
- 10.3.36 While it could be considered out of context with existing buildings in the High Road, officers consider the hotel to be an elegant, well proportioned, and visually interesting structure that meets the requirements of DM6 in that it acts as a landmark, identifying a location of civic importance and an area of high visitation. The main entrance to the Hotel is at street level on the ‘Plaza’ to be created at the junction of the High Road and Park Lane and is this considered to engage

positively with the street environment. Its design also complements that of the stadium.

### Southern Residential and Extreme Sports

- 10.3.37 The residential component of the proposal is submitted in outline with full details of layout, scale and access submitted ; and matters relating to appearance and landscape reserved for approval at a later stage. The application is submitted with a Design Code and Parameters relating to the residential and Extreme Sports components, which establish a series of design parameters that any subsequent reserved matters application will need to, comply with. This includes a commitment to a maximum of eight units per core, no single aspect north facing units, and minimum floor to ceiling heights of 2.5 metres, with 2.6 metres preferable at lower levels and a commitment that all units will meet the London Plan space standards. This ensures compliance with Local Plan Policy SP2, London Plan Policy 3.5 and the Mayor's Housing Supplementary Planning Guidance (SPG), November 2012.
- 10.3.38 The introduction of maisonette 'town houses' on Park Lane, with defensible space in the form of small front gardens is welcomed, as it will help to relate the larger scale of the proposed residential towers with the adjacent low rise housing. It is accepted that the introduction of two residential towers of up to nineteen above-ground storeys on Park Lane presents a contrast in scale to the two storey housing to the south; however this is considered to be an improvement on the present situation, where the south stand of the existing Stadium extends out above the highway at upper levels and presents a continuous line of blank frontage to the street. The proposals will considerably widen the footway, introduce tree planting, and open up views between the residential towers. The taller residential buildings are appropriately located further north, closer to the Stadium, with lesser impact on the surrounding context. The Design Code and Parameters are considered to be rigorous enough to ensure a high residential quality and are welcomed. Compliance with these is conditioned.
- 10.3.39 The Design Code and Parameters also secure the maximum height of each of the residential and Extreme Sports buildings.
- 10.3.40 The communal amenity space provided on top of the residential plinth is submitted in outline form, as it will need to respond to the final design of each of the residential blocks. The Design Code and Parameters establish appropriate design principles to inform the future consideration of this space.

### Public Realm

- 10.3.41 The intention to introduce new public routes across this large and currently impermeable site is strongly supported. This will be implemented through the podium level routes passing from the High Road to Worcester Avenue and Park Lane, both to the north and south of the proposed Stadium. The route to the south passes through the new 'South Podium Square', forming a 'green way route' linking Northumberland Park Station to White Hart Lane Station. These routes are lined almost exclusively with uses associated with the Stadium, chiefly access and circulation space. The South Podium Square has some adjacent cafe and restaurant space located in the hotel and Extreme Sports building; and flexible uses with the overlooking residential towers above, although this element is part of the outline application and expected to be constructed later. The relatively limited surrounding and overlooking uses, together with access to these routes via stairs/lifts raises some concerns about the level of active use and overlooking of these routes and spaces outside of match and event times, although it is noted that when the residential units are occupied overlooking will be extensive. The applicant has stated its intention for this space to be used by the Tottenham Foundation, community organisations and the Council for a variety of events. The way this area is utilised and managed will be essential to its effectiveness as a public open space. A management strategy for this space will be secured by the s106. A condition requiring the implementation of a CCTV strategy for public areas to be agreed with the Council is also included on the decision notice..
- 10.3.42 The 'South Podium Square' is equivalent in size to Trafalgar Square and includes a series of 'islands' around the ventilation shafts to the car parking areas, which provide seating, trees and planting; a 'jumping jet' water fountain; a multi-use games area and seating areas for the surrounding café and restaurant uses. The north, east and west sides of the Square allow spectator access to the Stadium. The proposals to include multiple uses and fountains, to enliven this large space, are supported. The designs indicate that the public realm will be of a high quality.
- 10.3.43 A new ground level 'Plaza' is proposed on the south-west corner of the site, at the junction of the High Road and Park Lane, providing a new gateway to the Stadium. The form of the 'Tottenham Experience' building appropriately delineates the space, also aligning with the High Road, while allowing large event day crowds to pass towards the Stadium. One of the entrances from the High Road to the basement car park and servicing area is through the Tottenham Experience building at ground level. This has the potential to create conflict between pedestrians and vehicles when accessing the stadium. The event day management plan will need to restrict vehicle access before and after an event to avoid a potential conflict.
- 10.3.44 The stretch of Worcester Avenue adjacent to the existing stadium and the cleared northern part of the development site is currently very poor quality. Along

its western side it is lined by the largely blank and mostly inactive facade of the existing East Stand and the hoarding around the northern part of the development. The east side of this road is mostly block wall and high security fencing along the perimeter of Northumberland Park Community School. The proposals seek to activate the southern end of Worcester Avenue, with accesses to one of the residential towers and the proposed flexible use in the podium. This element of the scheme is secured within the Design Parameters for the residential part of the outline application. The northern part of the scheme's frontage to Worcester Avenue is activated with entrances to the stadium corporate hospitality, stadium management offices, and the Community Health building. The eastern facade of the proposed stadium will also present a far more articulated and attractive frontage Worcester Avenue with a large glazed opening allowing views into the stadium interior. The proposals to make Worcester Avenue a shared space, with pedestrian zones delineated from vehicular/servicing routes through the positioning of trees and street furniture are strongly supported by officers.

## **Accessibility**

- 10.3.45 Local Plan Policy SP11 'Design', Saved UDP Policy UD3 'General Principles' and emerging Development Management Policies DM2 'Accessible and Safe Environments' all support and encourage accessible and inclusive design. London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion.
- 10.3.46 The applicants' access statement includes a full assessment of the approach to inclusive access for each element of the full and outline application. A full analysis is provided for the housing standards contained in the draft Interim Housing SPG, which demonstrates that the residential element will meet all of the relevant standards. An analysis of Lifetime Homes standards is also included, which demonstrates compliance, other than those to be addressed during detailed design. Access standards are secured in the Parameter Plans. The application is conditioned such that 90% of new housing will meet Building Regulations requirement M4 (2) 'accessible and adaptable dwellings and that 10% of new housing meets Building Regulation requirement M4(3)'Wheelchair user dwellings'ie designed to be wheelchair accessible or easily adaptable in line with the draft Minor Alterations to the London Plan.
- 10.3.47 The podium level public spaces are accessed by stairways and various points around the podium perimeter. The larger southern podium has 6 groups of stairs providing links to the High Road, Park Lane and Worcester Avenue. In addition lifts, which the applicant has confirmed will be operational 24 hours a day/7 days

a week, are provide at 4 locations. The GLA has suggested that an additional lift be provided as part of the wide flight of stairs leading up to podium in the southwest corner between the Tottenham Experience and the Hotel. The club has responded that this stair, the base of which is in the proposed 'plaza' at the junction of Park Lane with the High Road is on the main desire line for people travelling towards the stadium from the south. As such this stair is likely to experience the highest pedestrian flows and therefore needs to be as wide as possible. The nearest lift to this stair case is between the Hotel and Extreme Sports building approximately 40 metres away from the corner of Park Lane and the High Road for anyone approaching from this direction in need of lift access. Officers consider the proposed arrangements to be an appropriate balance between ensuring efficient pedestrian flows and inclusive access.

### **Interim arrangements for Podium**

10.3.48 As not all the podium will be provided until the later outline elements of the scheme come forward, an interim arrangement is detailed in the submitted 'Landscape Temporary Surfacing Plan. This sets out a smaller southern podium area required to provide safe access to the stadium. It has a basic block paving surface and is accessed from street level by temporary stairs from Park Lane, the permanent stair and lift in this location will be installed when the southern podium is completed with the latter phases of the development. All other stairs and lifts to the podium will be installed prior to the stadium opening and their delivery is conditioned.

### **Outline Applications**

- 10.3.49 The QRP were of the view that the residential towers and extreme sports buildings because of their size and proximity to the Conservation Area should be submitted in full. The panel noted that tall buildings succeed or fail on the quality of their detailed design. The panel felt that there is a risk of the design and construction quality being 'dumbed down' through value engineering at reserved matters stage.
- 10.3.50 Although CABE/EH Guidance on Tall Buildings (2007) calls for tall buildings to be submitted in full application form, Officer's agree with the view expressed in the GLA Stage 1 report that the Design Code and Parameters are sufficiently rigorous to ensure a high quality development. Officers would add that it is within the Council's control to ensure that the standards set out in the outline application are maintained at the reserved matters stage. Under the Council's scheme of delegation reserved matters for major applications are dealt with by committee. To further ensure that design quality is maintained the GLA also strongly encourage the retention of the residential scheme architect and this or a suitable alternative to be agreed with the Council is conditioned



## Child playspace

10.3.51 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. The Mayor's Play and Recreation SPG sets a benchmark of 10 sq.m of useable child playspace to be provided per child, with under 5 child play space provided on-site as a minimum. Using the methodology in the Mayor's SPG it is estimated that the child yield will be 41. The Design code submitted in support of the outline planning application identified that the provision of playspace will be in line with the SPG, which is acceptable given that the Design Code is an approved document and compliance with the design code is conditioned.

## Density

10.3.52 London Plan policy 3.4- Optimising Housing Potential states that taking into account local context and character development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. The site is within an urban location where the density matrix sets a guideline of 200-700 habitable rooms (or 45-260 units) per hectare on a site such as this where the PTAL is 4. The policy does set out however that the ranges are guidelines and should not be applied mechanistically. The density using the whole area of the site is approximately 128 units per hectare however when taking the residential site in isolation (0.5 hectare) the density is considerably higher and is 1,170 units per hectare (3,010 habitable rooms per hectare) . Given that the high quality of living environment is secured by the Design code, and taking account of the open space surrounding the residential site, this is acceptable in this instance in this growth and Opportunity Area.

## Design conclusion

10.3.53 The visual and townscape assessments accompanying the application demonstrate that the scale of development proposed within the application will have a significant impact on the appearance of the area locally, and will render the stadium site more visible in distant views and from raised vantage points. The Design and Access statement indicates how the proposals have evolved from the earlier consented scheme, and have changed in response to a range of design considerations, including the effects of crowd safety modelling. The requirement in the emerging and existing planning policy framework is for such developments to embody a quality of design consistent with their scale, and the ambitions for the area.

10.3.54 The site itself with the existing stadium and its large plot, the Love Lane Estate, the recent Brook House development and the older residential tower on Fore Street are all large buildings. The existing consent has already set the principle of a replacement stadium similar to the scale proposed. While the additional

development on the south of the new stadium is of a scale that exceeds what was previously approved in terms of scale and height, the cluster of tall buildings adjacent to the significant bulk of the stadium building is considered to be acceptable and consistent with emerging planning policy which supports new development including tall buildings in this part of Tottenham.

- 10.3.55 The quality of the design has been considered by officers in addition to the QRP and GLA. This has highlighted differences in view on specific elements of the scheme. Conditions are considered appropriate to engage with the concerns expressed by both bodies around the design of the proposals. The implications of the crowd modelling (and changes to the site layout) have prompted considerable comment because of the implications on the locally listed buildings and consequential effects on heritage interests in the area. The conclusions of the crowd modelling and associated design changes have been reviewed by the Local Planning Authority and found to be sound. The QRP have expressed the view, consistent with that of officers that if the loss of the buildings is justified, the design response of the proposed replacement building is, subject to minor changes that might be achieved by condition, appropriate. The scheme also provides safe and accessible buildings and open spaces.
- 10.3.56 The proposals overall amount to a dramatic and significant intervention into an established area embodying mixed architectural styles and varying building scale. The physical impacts of the development on surrounding buildings and users are considered separately. The proposals have prompted a range of comments and have been the subject of design review. On the basis of the Local Planning Authorities assessment of the design merits, and notwithstanding the impact of the proposal on existing heritage assets and the North Tottenham Conservation Area (which is dealt with in the Heritage section of this report) the scheme is considered to demonstrate high quality design as required by existing and emerging development plan policies and is therefore acceptable.

## **10.4. HERITAGE**

### Background:

- 10.4.1 Tottenham Hotspur Football ground partly falls within the North Tottenham Conservation Area. North Tottenham is the second oldest Conservation Area in Haringey, the core around the junctions of White Hart Lane and Northumberland Park with the High Road being originally designated on 28 March 1972.
- 10.4.2 The second, separate, southern section of the High Road between Brereton Road and Lordship Lane was designated on 26 March 1978. The small central section from Brereton Road to Whitehall Street that joined the two was subsequently designated on 16 September 1991. Chapel Place, to the north west of the junction between the High Road and White Hart Lane was included in a

further extension on 14 March 1995. The current conservation area boundary was further amended on 13 July 1998 to include the section of the High Road between the northern borough boundary and Brantwood Road together with several other minor additions and deletions.

- 10.4.3 The North Tottenham Conservation Area is part of the Tottenham High Road Historic Corridor of six connected Conservation Areas and that includes Scotland Green and Bruce Grove Conservation Area to the south.
- 10.4.4 An appraisal of the North Tottenham Conservation Area was undertaken as part of a wider appraisal of the entire Tottenham High Road Historic Corridor and adopted on the 9<sup>th</sup> March 2009. A more recent appraisal has been undertaken of the Tottenham High Road Townscape Heritage Initiative (THI) which is a sub area, of the North Tottenham Conservation Area which was adopted on the 19<sup>th</sup> December 2014).
- 10.4.5 The conservation area contains a number of locally listed and statutorily listed buildings This section of the High Road is characterised by predominantly three-storey brick-built Victorian, Edwardian and some Georgian buildings) that front directly onto the High Road.
- 10.4.6 NPPF chapter 12 'Conserving and enhancing the historic environment' and London Plan policy 7.8 'Heritage Assets and Archaeology' states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Similarly Local Plan Policy (2013) SP12 seeks to ensure the conservation of heritage assets, their setting, and the wider historic environment.
- 10.4.7 Paragraph 129 of the NPPF states that the LPA should assess the particular significance of any heritage asset that may be affected by the development. Paragraph 131-2 states that the LPA should take account of the desirability of sustaining and enhancing the significance of heritage assets and that great weight should be given to their conservation. Paragraph 133 sets out that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 10.4.8 Paragraph 134 of the NPPF sets out that where a development proposal will lead to less than substantial harm to the significance of the designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 10.4.9 Paragraph 135 of the NPPF sets out that the effect of an application on the significance of non-designated heritage assets should be taken into account in

determining applications. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

10.4.10 There is a legal requirement for the protection of the Conservation Area. The Legal Position on the impact on these heritage assets is as follows, and Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provide:

“In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.” Among the provisions referred to in subsection (2) are “the planning Acts”.

10.4.11 Section 66 of the Act contains a general duty as respects listed buildings in exercise of planning functions. Section 66 (1) provides: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

10.4.12 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight” when the decision-maker carries out the balancing exercise.”

10.4.13 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority’s assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against

planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

10.4.14 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.

#### Heritage Assessment:

10.4.15 In essence, the main heritage assets to consider are:

- Tottenham Historic Corridor
- North Tottenham Conservation Area, including the other listed and locally listed building beyond the immediate vicinity of the site No 744, Warmington House (listed grade II)
- Nos 746-750, locally listed, proposed to be demolished
- Nos 790-814 High Road on the north side, most of which are listed at grade II and II\* (the northern terrace);
- No 707, High Road (listed grade II)
- No 705, High Road (locally listed)
- St Francis De Sales RC Junior School and Presbytery (Locally Listed)
- Nos 743-759 on the south side, locally listed
- Nos 793-829 on the south side, listed (grade II) and locally listed
- 2-4 Park Lane (Locally Listed)
- Bruce Castle Conservation Area
- Alexandra Palace and Park Conservation Area and Registered Historic Park
- Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield

10.4.16 One of the most significant aspects of the conservation area is that it is part of a long established route. Tottenham High Road is now, and has been for many centuries, a main route into London from the north. The Roman road, known as Ermine Street followed parts of the High Road. In the Middle Ages, settlement was strung out along the road. During the 18th century, fashionable houses were built along the High Road, and later, as mass transport developed in the form of

railways and trams, the High Road became infilled with houses, shops, and grand civic and commercial buildings.

- 10.4.17 The junction at Northumberland Park and White Hart Lane forms a historic village core with an intense and highly significant cluster of Statutorily Listed buildings (mainly grouped on the east side of the High Road), and Locally Listed buildings. Paragraph 4.28 of the Tottenham Historic Corridor Appraisal (adopted 2009) states- 'This section of the eastern side of the High Road is fronted by some of the best preserved groups of the substantial Georgian properties that characterise much of the area'. Unfortunately, many of these buildings have been vacant and neglected for over 15 years and are included in Historic England's 'Heritage and risk' register.
- 10.4.18 The 18th Century Georgian town houses on the eastern side of the High Road adjacent to the stadium are vital and distinctive elements of this part of Tottenham. There is a distinctive and idiosyncratic quality to this part of the conservation area, resulting from the 'interweaving' of several phases of developments of North Tottenham: the high quality Georgian buildings juxtaposed with the later mainly two to three storey Victorian and Edwardian buildings along with the Tottenham Hotspur Stadium and the latest Lilywhite Lounge rising above the Georgian terraces, as viewed from White Hart Lane. The High Road, however, appears distinctive with the general homogeneity in scale and massing of the various buildings, built up to the pavement.
- 10.4.19 The Tottenham Hotspur Football Club has great cultural significance not only within the local area but beyond London. On match days, the area transforms with football fans flocking into the stadium, with many businesses thriving on match day economy. The club's association with Tottenham High Road is over 130 years old. The club derives its name from the wife of the owner of Percy House, 796 High Road, who was the grand-daughter of the Earl of Northumberland and descendant of Hugh 'Hotspur' Percy (1364-1403) after whom Tottenham Hotspurs Football Club was named<sup>1</sup>.
- 10.4.20 Notwithstanding the above, the current stadium's architectural contribution to the setting of the conservation area is negative and even though set back, its relationship with the High Road is poor. This section of the High Road originally contained a row of unlisted, locally listed buildings and one listed building behind which the Stadium almost existed unobtrusively. As already stated above, this group of buildings has been demolished as part of the part implementation of the previously granted scheme. Paragraph 4.36 of the adopted appraisal described these buildings as:

*'The section of the High Road between Paxton Road and Bill Nicholson Way is primarily lined with three storey Victorian buildings that front directly onto*

*the road. They have shops at ground floor level, with two floors of residential accommodation above. Nos. 754 to 766 (even) are local listed buildings, typical of the narrow fronted Victorian shop houses of approximately 6m wide, that are common along the High Road. Together with Nos. 752A to C this terrace is constructed of yellow London stock brick, Nos. 752A to C with red brick dressings. Unfortunately, Nos. 764 & 766, now have rendered facades, 'boarded up' windows and their poor condition diminishes their contribution to the streetscene'.*

- 10.4.21 The demolition has caused the uninspiring frontage of the existing stadium to be exposed detracting from the conservation area. The demolition has also resulted in a break in the High Road, thus causing harm to the significance of the conservation area and its setting.
- 10.4.22 A further three locally listed buildings are being proposed to be demolished. These are described in the applicant's appraisal as:
- a) **No. 750, the former White Hart public house** is a three storey local listed Victorian building that is constructed of red brick, with stone mullioned casement windows and decorated moulded double gables on both street elevations. Its ground floor pilasters and cladding is in granite and it has a splayed corner with a distinctive arched entrance. Although the building has been detrimentally altered through the introduction of unsympathetic fascia signage, it is of architectural interest.
  - b) **No. 748, The Red House**, is a grand three storey locally listed late Victorian building, which is constructed of red brick with steeply pitched double gable ends to the High Road, slate roofs and tall red brick chimney stacks. The first and second floors are delineated by stucco stringcourses, and both the High Road and Bill Nicholson Way elevations have a first floor central white painted canted oriel window with a decorated parapet.
  - c) **No. 746 (former Tottenham Dispensary)** is an attractive symmetrical three storey red brick Edwardian local listed building with a Portland stone ground floor façade and an arched central entrance flanked by stone columns with a semi-circular fanlight over the door. The stone entablature fascia is inscribed 'TOTTENHAM AND EDMONTON DISPENSARY'. It has a prominent projecting stone parapet cornice with dentils and panelled blocking course, and tall brick chimney stacks at each end.

#### Historic England's view

- 10.4.23 Historic England remains unconvinced that the substantial harm to the historic environment caused by the proposals has been clearly justified as required in the NPPF. It summarises its comments as follows: *'In our view, the proposed scheme would not deliver additional public benefits over and above those which the consented scheme would deliver. The proposals fail to preserve the setting of*

*a listed building, and neither preserve nor enhance the character or appearance of the conservation area. They are therefore contrary to the 1990 Act as well as the NPPF and local planning policies. Historic England accordingly raises strong objections to the proposals, and urges your council to refuse them. Should your council or the Mayor of London be minded to approve the applications, we will give careful consideration to whether the Secretary of State should be advised to call in the proposals for his own determination given the severity of the impact and the lack of policy support for the harm done.'*

#### Mayor of London's view

10.4.24 GLA officers concluded that the proposals will cause substantial harm to the significance of the Conservation area and that although the substantial public benefits arising from the proposal could outweigh the loss of the buildings that the applicant should consider relocating the frontage of the Dispensary in the Tottenham Experience terrace and relocate Bill Nicholson's office on the museum. They considered that harm to the other heritage assets was outweighed by the considerable public benefits. However the Mayor was of the view that the loss of the locally listed buildings was unacceptable and they should be retained.

#### Impact of demolition

- 10.4.25 It is accepted that the applicant's Heritage Statement is well detailed and researched. The Conservation Officer agrees with the assessment in paragraph 1.2.2 that '*The recent consented demolition.....detracts from the conservation area and the setting of the listed buildings in the conservation area.*' However, her view is that it fails to acknowledge that the demolition was part of the previous consent and should be assessed cumulatively with the additional demolitions proposed.
- 10.4.26 It is the view of the Council's Conservation officer that the cumulative impact of the already demolished buildings in addition to the further demolition proposed would have a negative impact on the conservation area and on the continuity of the High Road as is evident already.
- 10.4.27 In the Conservation Officer's view, whilst the demolition of the buildings as part of the implemented works cause loss of significance to the linearity of the High Road, the three locally listed buildings, along with Warmington House, form an important group that to some extent reinforce the scale and building line of the High Road at this end of the stadium. Additionally, whilst in a run-down neglected condition, the locally listed buildings are an attractive group with significant architectural detailing that contributes positively to the conservation area as well as the setting of the listed building.



- 10.4.28 The current proposal is considered to be causing further harm to the continuity of the conservation area and the historic corridor. At the time of the previous application, in order to facilitate the stadium development (prior to Barnwell Manor case law and the NPPF) demolition was agreed despite the substantial harm with the agreement to protect and preserve the three locally listed buildings (Nos 750, 748 and 746) and the listed building (Warmington House, No 744) at the southern end of the development. This was following several efforts and negotiations from Historic England, SAVE Britain's Heritage and the Victorian Society along with Haringey's own Conservation Officer. On balance, the podium level interaction along the High Road and the retention of the remaining four buildings was seen to provide some continuity to the High Road.
- 10.4.29 The new scheme proposes further demolition of three locally listed buildings, leaving only the listed Warmington House on this stretch of the High Road. It is the opinion of the Council's Conservation Officer that, the proposed demolition, cumulative with the consented demolition, would cause substantial and irreparable harm to the continuity of the historic corridor, the conservation area, the listed and locally listed buildings within it and their setting.
- 10.4.30 The impact of demolition on the setting of other listed buildings (the Northern Terrace) 707 High Road, and other locally listed buildings would be limited given their distance and proximity.

#### Significance of the Locally Listed buildings.

- 10.4.31 The applicant has summarised the significance of the locally listed buildings in the Heritage Statement. Much is made of the 'loss of context due to the demolitions', not just from the recent demolitions arising from works to implement the current planning permission but also the incremental loss of the setting and significance of these buildings as the stadium itself expanded.
- 10.4.32 Based on their own assessments as well as the Council's Appraisal, Haringey's Conservation Officer considers the significance of these buildings to be high in terms of their architectural, historic and communal value. The officer does not consider the poor condition of their interiors (which is not unusual in locally listed buildings as they are not protected) to be a reason for diminishing their local contribution to the conservation area.
- 10.4.33 The Council's Conservation Officer does not agree with the applicant's assessment of the architectural and aesthetic significance of the building on the basis of their unkempt condition and 'loss of context'. The Heritage Statement is considered by the conservation officer to not acknowledge that the demolition of local buildings which has contributed to the loss of context was part of an agreed plan to facilitate the stadium's development with the agreement to retain these particular buildings.

- 10.4.34 Based on its assessment, the applicant implies that the loss of the buildings would cause less than substantial harm, since they have already lost their context and that their unkempt and vacant condition has diminished their significance. However the Council's Conservation Officer disagrees and attributes high significance to these buildings individually, and concludes that they contribute positively to the conservation area's architectural, historic and communal value. It is therefore the view of the Conservation Officer that their demolition would cause substantial harm to the conservation area and its significance.
- 10.4.35 Additionally, their loss would also cause substantial harm to the setting of Warmington House, a statutorily listed building. The buildings together form a group and are part of the continuity of the High Road's past and contribute to Warmington House's setting.

### **Justification of demolition**

- 10.4.36 Paragraph 4.2.14 of the applicant's heritage statement states that 'The demolition of the three locally listed buildings is proposed in order to address two key issues: crowd flow safety and townscape'. Paragraphs 4.2.15 to 4.2.41 go into details of how the demolition would achieve safer pedestrian flow and that the proposed Tottenham experience building would enhance the townscape of the High Road.
- 10.4.37 In terms of townscape, the applicant's Heritage Statement argues that the replacement of the buildings 'would allow a more holistic approach to the design of the stadium development, transforming the way in which it will address and connect with the High Road and resulting in an overall enhancement of the character of the conservation area' (paragraph 4.2.18). It further states that 'The significance of the locally listed buildings would be partially retained by salvaging artefacts and elements of the building for relocation and/or reuse within the proposed Tottenham Experience Museum'. This includes: the shop front of the 'Tottenham and Edmonton Dispensary'; Bill Nicholson's panelled office in the Red House; and possibly elements of the façade such as the bay window (paragraph 4.2.23). It further states that the local historic significance of the buildings would be recorded in the form of virtual interactive exhibits in the proposed Museum.
- 10.4.38 The design of the proposed buildings and their townscape contribution is discussed separately in the relevant section, under the heading 'Tottenham Experience and Warmington House'. With regards to the townscape, the Conservation Officer considers that the High Road is a diverse mix of Georgian, Victorian and Edwardian buildings, mainly two to three storeys in red or yellow stock brick. Whilst there are inter-war and post war buildings interspersed, the general homogeneity of scale and massing prevails throughout, providing

continuity along the High Road. This in essence, is the townscape of the area. The three buildings proposed to be demolished contribute positively to this townscape.

- 10.4.39 The applicant argues that the proposed terrace would ‘allow for a more holistic approach to the design of the stadium development’. The Conservation Officer agrees with this argument to a degree in that that the materials and, to an extent, the scale would form a transition between the stadium and the High Road. Whilst this may have some townscape benefits, it would not outweigh the substantial harm caused by the loss of the locally listed buildings and the substantial harm caused to the setting of Warmington House.
- 10.4.40 The three pieces of artefacts and façades that would be ‘saved’ and placed within the interiors of the Tottenham Museum would be taken out of their original context and would not overcome the total loss of their significance. Whilst there could be an argument that part of their communal significance is being retained by way of interpretation, this would not outweigh the substantial harm.
- 10.4.41 Additionally, paragraphs 4.2.19 and 4.4.19 of the Heritage Statement discusses the options of retaining the three locally listed buildings and the impact it may have on the delivery of the project. It claims that the layout of the buildings is such that they cannot be incorporated within the new terrace. It also states that the condition of the building and spaces available could not be utilised fully in the manner that the current proposal does. It states that the Tottenham Experience as well as the Skywalk would then be relocated to the rear, taking away active frontage from the High Road. The Conservation Officer disagrees with this proposition as no such alternatives have been presented that would evidence this argument. The options appraisal only talks about the related crowd flow safety issue but does not discuss issues around the functionality (or lack of) of the locally listed buildings. The Conservation Officer, therefore, disagrees with this justification.
- 10.4.42 The second, and more important justification for the demolition of the locally listed buildings is the issue of crowd safety. This issue is dealt with above at para 10.2.51-55. In terms of the balance with para 133 of the NPPF, i.e. whether the loss is necessary to achieve substantial public benefits, that balance is addressed in the conclusions to the report.
- 10.4.43 Overall, the Conservation Officer concludes that the substantial harm caused due to the demolition of the three locally listed buildings on Warmington House, the conservation area, and their setting is not justified. The crowd safety argument requires demolition of three locally listed buildings and would cause harm to the conservation area, the listed building and their setting. Recreating a new terrace in modern materials, whilst it may respond to the Stadium’s design, does not overcome the substantial harm caused by the loss of three positively contributing

buildings. The heritage benefit in retaining the three pieces of the facades and artefacts is limited and as such does not overcome the substantial harm.

### Impact of the proposed development on the historic environment

#### The Stadium

- 10.4.44 The Council's Conservation Officer acknowledges the proposed new stadium to be an exceptionally high quality design. However, notwithstanding the quality of the design, it is the Officer's view that the scale, height and massing of the structure, whilst established by the previously consented scheme, remains alien to its High Road context, and would therefore not preserve the setting of the High Road, the wider conservation area and other designated and non-designated heritage assets, especially the listed buildings along the North terrace.
- 10.4.45 However it is the view of the Conservation Officer that this harm would be less than substantial as there is already a stadium on the existing site, albeit set back from the road and that the harm (of the stadium only) would be no greater than the consented scheme. The stadium would also have an impact on the setting of the other listed and locally listed buildings along the west of the High Road. This again, would be no greater than the consented scheme and would be less than substantial. Due to its high quality design, the new stadium would provide a greater degree of enhancement than the existing stadium or the consented scheme, providing considerable heritage benefit. The Council conclude, that the heritage benefit of replacing the negatively contributing existing stadium with the proposed high quality new stadium would overcome the less than substantial harm to the setting of the conservation area and the listed (the Northern Terrace and 707 High Road) and the locally listed buildings on the west side caused by its scale.

#### Tottenham Experience and Warmington House

- 10.4.46 The Conservation Officer sets out that while the Tottenham Experience may have an appearance of a three storey terrace when viewed from the High Road 'the Tottenham Experience' is actually a much larger building conjoined with the southern podium and plinth. The terrace would be on either side of Warmington House, visually enclosing it on three of the four elevations. With higher floor to ceiling heights this 'two storey' structure would be the same height as the listed building itself. To the rear, there would be an atrium connecting the rear of the building to the public square. The works would restore the listed building, including repair works on all the facades and careful conversion of the interiors to allow for it to be used as the Tottenham Experience Museum. The applicant sets out that this part of the museum would encapsulate not only the history of the football club but also reflect the history and cultural heritage of Tottenham as a place.

- 10.4.47 The Heritage Statement justifies this approach stating that Warmington House was always part of a terrace and having lost its 'context' with the further proposed demolition of the three locally listed buildings, the proposal would enhance its original setting, albeit in a contemporary manner.
- 10.4.48 The Council's Conservation Officer welcomes the retention of the listed building as well as its restoration, and the treatment to the front façade with the doorsteps and railings reintroduced to provide some defensible space and would consider this as heritage benefit. She also agrees that whilst rather simple, the new terrace reflects the scale and massing of the listed building and the High Road and would be of a high quality and contemporary design that responds to the character of the new stadium. However, the proposal would cover the Listed Building entirely on three elevations, and in the Conservation Officer's opinion, would not provide an appropriate context to the Listed Building causing substantial harm to it. In addition, the rear atrium would only provide glimpses of the listed building to the passing crowd without any real interaction with it. As such the proposal would, cause substantial harm to the building's setting because it will be covered on three elevations.
- 10.4.49 Whilst the glass insertions on either side do help to break the elevation to provide a distinction with the listed building, it does not successfully overcome the substantial harm to the listed building and its setting. The heritage benefit of restoring and converting the building may offset some of the harm, but still does not successfully overcome the substantial harm.
- 10.4.50 In terms of the new terrace and its impact on the conservation area and the setting of the locally listed building immediately west and south of it, the Conservation Officer gives some merit to its design as it does respond to the High Road in terms of scale and design of the new stadium. It provides some degree of enhancement to the setting of the High Road by providing a continuous elevation, as the locally listed buildings currently provide. However, this does not reflect the character of the High Road itself. As such, the Conservation Officer considers that the enhancement provided by the high quality design of the new terrace does not overcome the substantial harm caused by the demolition of the locally listed buildings or the impact on the conservation area or to its setting.
- 10.4.51 Should the planning application be granted the Conservation Officer sets out that following conditions should be included on the associated Listed Building Consent Decision Notice:
1. All works should be made good to match the existing fabric in colour, material and texture. If works cause any un-intentional harm to the existing fabric, this should be repaired or replicated to match existing.

2. Any hidden historic features (internal or external) which are revealed during the course of works shall be retained in situ, work suspended in the relevant area of the building and the Council as local planning authority notified immediately. Provision shall be made for the retention and/or proper recording, as required by the Local Planning Authority.
3. Details of materials including external finishes, metal and any masonry should be submitted to the Council for approval. This should be an appropriate lime based mortar such as 1:2:9 (Cement: lime: aggregate) and match existing mortar in colour and texture.
4. A detailed and itemised schedule of works, methodology statement, detailed plans and drawings as appropriate in respect of the following, shall be submitted to and approved by the Local Planning Authority before the relevant part of the work is begun.
  - a. The staircase, its material and treatment of the defensible space immediately in front of the House;
  - b. Repair, reinstatement of fabric including brick and mortar repairs and any additional works affecting the internal and external fabric of the listed building;
  - c. Detail of structural investigations to verify the loading capacity of the building and any concealed damage to the structure that may occur due to the new extensions on either side;
  - d. Further details of how the new structure would be integrated with the existing listed building;
  - e. All doors, windows and rainwater goods;
  - f. Details of all decorative profiles on walls, ceiling surfaces, staircases, handrails, floor finishes, doors and fanlights as applicable; and,
  - g. Location and finish of all mechanical ventilation, louvers, and communal satellite as applicable.

THFC to secure a Heritage Management Plan for Warmington House and submit to Council and Historic England for approval. THFC to bind successors in title to the provisions of the Management Plan. (This can also be part of Sec 106)

### Public realm

10.4.52 The proposed public square, beyond the Tottenham Experience, is at nearly three storeys height accessed from street level. This would leave a wide pavement branded in the alternative grey and white stripes along the High Road itself. Whilst the public square itself may be bigger than the area of Trafalgar Square with many facilities, this does not interact or contribute to the conservation area the listed and locally listed buildings within it, or its historic context. Most of it is along the southern edge of the Stadium, along Park Lane, again at three storeys. As such the proposed 'pavement widening' would neither preserve nor enhance the High Road and by virtue of its apparent height and finishing would cause some harm to the conservation area, its setting and the listed and locally listed buildings within it. There are no heritage benefits

presented by the public realm that would outweigh the less than substantial harm.

### Hotel

- 10.4.53 The scheme further proposes a 22 storey hotel at the south western corner of the site. Described in the application as both ‘blade shaped’ and ‘Shard like’. The submitted Heritage Statement states that ‘In views north along the High Road its narrow southern end would form an elegant marker, forming a pleasing contrast between its vertical line and the horizontal emphasis of the proposed stadium’.
- 10.4.54 Whilst the Council’s Conservation officer agrees that the views of the sharp edge of the hotel would be elegant when viewed from the south of High Road, the structure would introduce a scale and form that is unprecedented in this part of the conservation area. As such the structure would have an impact on the setting of the conservation area and the setting of the designated and non-designated assets within it such as the locally listed buildings on Park Lane. Additionally, the wider elevation of the Hotel would, along the High Road, create a slab like structure rising behind Warmington House and the new terrace proposed. Whilst the height of the stadium is offset from the immediate vicinity of the listed building, the height and width of the Hotel would have a direct impact on the setting of the listed building and contribute to its diminishing prominence on the High Road. As such, it would not preserve or enhance the setting of the listed building and would cause substantial harm to it. Additionally, it would cause some harm to the setting of the conservation area. By virtue of its height, the hotel would also be visible from the Alexandra Palace Park and may also be visible from Bruce Castle Park and would cause some harm to their setting, but only with respect to views from both parks.
- 10.4.55 The Conservation Officer therefore disagrees with the Heritage Statement which concludes that the Hotel would not have a negative impact on the significance of the listed buildings within its immediate vicinity.
- 10.4.56 Whilst it may be an attractive addition from the southern end to the skyline and may provide some level of enhancement to the setting of the conservation area, it does not overcome the less than substantial harm to its setting or the substantial harm to the listed building and its setting.

### Reserved matters: Extreme Sports Centre and residential towers

- 10.4.57 The scheme further seeks outline permission for a cluster of residential towers on the southern edge of the stadium. Whilst materials are subject to reserved matters, the towers are likely to be clad in masonry materials such as brick, terracotta or concrete. In terms of their design, appearance and materiality, the towers would form a coherent group.

- 10.4.58 Additionally, the scheme proposes an Extreme Sports Centre over 51 m tall (17 storeys) with a dynamic form to accommodate both outdoor and indoor facilities, including climbing wall inside and on the building's exterior.
- 10.4.59 From a conservation point of view, the proposed towers together with the Hotel, would form a cluster of tall buildings and would introduce a scale and form unprecedented within the setting of the conservation area. Residential towers were consented as part of the previous scheme but these were up to 20 storeys with top floors receding in a manner that the tallest elements were closest to the stadium. As such the new scheme introduces a higher and, therefore, more intrusive set of towers that would neither preserve nor enhance the significance of the conservation areas, the listed and locally listed buildings or their settings, causing harm. Given the context of the stadium and the previous consent, the Conservation Officer considers the harm to be less than substantial.
- 10.4.60 With respect to justification, it is the Conservation Officer's view that there appears to be no heritage or townscape based evidence that justifies the positioning, location or the height of the proposed towers. Whilst there is merit in the design of these towers, this would not outweigh the less than substantial harm. Planning Officers are of a different view and as set out above believe that there is a townscape rationale for tall buildings in this location marking the location of the stadium.
- 10.4.61 Additionally, whilst the visibility of the proposed cluster of towers from Bruce Castle is limited there would be an impact on the Conservation Area albeit less than substantial. This harm, however, would not be offset by any heritage benefits.
- 10.4.62 The visibility of the towers would be more extensive from Alexandra Palace Park, given the topography and the cluster would have an impact on the Alexandra Palace Park Conservation Area and the Historic Park. However, it would still be less than substantial and given their distance, context of the stadium and beyond, would be overcome by design and townscape (mainly skyline) benefits.
- 10.4.63 Outside the borough boundary, the proposed cluster of towers would also have an impact on the Fore Street South and Fore Street Angel Conservation areas within London Borough of Enfield. The Conservation Officer considers that given the distance and the alignment of the street, the cluster would have minimal impact on the conservation areas. If at all visible, the existing towers such as Brooke House would mitigate the potential impact of the new towers as they would form a backdrop to already existing higher blocks in the vicinity. The Conservation Officer therefore, concludes that with regards to the two nearest conservation areas in Enfield, the impact of the towers would be negligible.

## Conclusion



- 10.4.64 The Conservation officer has assessed that there is substantial harm to designated heritage assets in the following respects:
- demolition of the locally listed buildings
  - impact on the setting of the Warmington House, both from the impact of the demolition of the adjoining building, and the effect of the new terrace but also from the impact of the proposed tall buildings
  - impact on the setting of 4 Conservation Areas.
- 10.4.65 It is acknowledged by the Council's Conservation Officer that the proposed scheme is of a high quality design. However the Conservation Officer considers that the current proposal would have a much greater degree of intervention than the previously consented scheme. This includes further loss of historic buildings (in addition to the demolished buildings as part of the previous consent- part implemented) and impact on the listed, locally listed buildings and the conservation areas and their setting. The introduction of the cluster of towers would, she considers also cause further harm introducing an urban form and scale unprecedented in the area. The Conservation Officer's conclusion overall, is that the proposal would lead to loss of significance of heritage assets and their setting, causing substantial harm to them and would not provide sufficient heritage benefits that would outweigh this harm. These conclusions are materially different from the conclusions reached in the applicant's Heritage Statement.
- 10.4.66 In making the above assessment, great weight has been given to the preservation or enhancement of the heritage assets as per the Council's statutory requirement.
- 10.4.67 At the end of this report the justification for the demolition of the locally listed building, the new buildings and the overall balance of heritage harm against other material considerations is set out. Here it is concluded that whilst the substantial harm, and less than substantial harm, caused has been given great weight the overall substantial benefits of the proposal when viewed as a whole outweigh the less than substantial harm and overall the harm caused is necessary to achieve the substantial public benefits that outweigh the harm and loss.

## **10.5 TRANSPORT**

### Introduction

- 10.5.1 The proposed site is enclosed by the recently implemented supermarket and technical college to the north, to the east by Worcester Avenue, to the west by the A1010 High Road and to the south by Park Lane. This section of the High Road has a public transport accessibility level of 4/5 (medium to high) and is part of the strategic road network (SRN). There are ten bus routes serving this area: 149, 279, 259, 341, 476, 123, 243, 318, W3 and 349 with bus stops on the High

Road and on Northumberland Park. There are two rail stations within reasonable walking distance of the site. White Hart Lane station is approximately 450m to the west and provides access to services on the Seven Sisters branch of the Lea Valley line. Northumberland Park station is approximately 600m to the east and provides access to services on the West Anglia main line. The closest underground station is Tottenham Hale on the Victoria Line, approximately 2.2 km from the stadium; Seven Sisters is 2.3km to the south of the stadium. Although Tottenham Hale station is closer to the stadium than Seven Sisters station most spectators currently use Seven Sisters Station as it perceived to be closer, is more accessible by foot and is more easily reached by bus.

10.5.2 There have been a number of changes to the local transport infrastructure since the current planning permission was granted in 2011 and 2012. Other planned transport improvements are due be implemented before 2018 when the new proposed stadium is due to become fully operational. A summary of the changes are outlined below:

- 1) The completion of the Victoria Line upgrade, which has provided faster and high frequency trains. A new timetable to be implemented in 2016 will see all trains running to Walthamstow Central via Tottenham Hale. This will increase the capacity at Tottenham Hale.
- 2) White Hart Lane, which was formally on the Abellio Greater Anglia line, has been taken over by TfL and is now part of the London Overground network. This will include new rolling stock from 2018 which will increase the line's capacity. There is also a proposal to remodel the station to provide better connectivity to the new stadium, and improve platform loading.
- 3) Upgrade of Tottenham Hale station and bus interchange, and improvements to the pedestrian environment resulting from the removal of the Gyratory and the introduction of the Green Link has enhanced Tottenham Hale as an alternative to Seven Sisters station.
- 4) The Mayor's Cycling Super Highway 1 (CS1) is currently being implemented and will be completed in 2016. The new cycle route will provide better north/south cycling connectivity to the new Stadium which is located at its planned northern terminus.

#### Relevant Policy

10.5.3 The transport impact of the development has been assessed in the context of the following:

#### London Plan

Policy 6.1: 'Strategic Approach'.

Policy 6.3: 'Assessing Effect of Development on Public Transport capacity',

Policy 6.7: 'Better Streets and Surface Transport',

Policy 6.9: 'Cycling'.

Policy 6.10: 'Walking'.

Policy 6.11: 'Smoothing Traffic Flows and Tackling Congestion'.

Policy 6.12: 'Road Network Capacity'.

Policy 6.13: 'Parking'.

#### Local Plan, Strategic Policies

Policy SP7: 'Transport'. Focuses on promoting sustainable travel and making sure all development is properly integrated with all forms of transport, in line with the Government's transport objectives set out in section 4 of the NPPF and the Mayor of London's strategic transport approach in the London Plan.

#### Saved UDP Policies

M9: 'Car Free Residential Development'. Supports car free development in locations where there are alternative and accessible means of transport available; public transport accessibility is good; and a controlled parking zone exists or will be provided prior to occupation of the development.

M10: 'Parking for Development'. Development proposals will be assessed against the parking standards set out in Appendix 1 of the UDP. Proposals that do not meet these standards will not normally be permitted. Parking requirements will be assessed on an individual basis as part of the Transport Assessment.

Haringey's Draft Development Management Policies DPD: Draft DM DPD policies relevant to the transport assessment of this application are:

DM31: 'Sustainable Transport'.

DM32: 'Parking'.

#### **Event Day Assessment**

10.5.4 This section will review the proposed increase in the capacity of the stadium over that previously granted and the proposed increase in the number of non-football major events to be held.

10.5.5 The existing planning permission for the site includes a stadium with a capacity of 56,250. The impacts of the previous stadium on the transportation and highways network have already been assessed as part of planning application HGY/2010/1000, and mitigation measures were agreed as part of the S.106 agreement for that permission. Some of these measures have already been implemented including the first phase of the new event day CPZ.

10.5.6 This application is seeking to increase the capacity of the stadium to 61,000 (an additional 4,750 above the 2010 approved scheme).

- 10.5.7 Given the length of time since the 2010 approved scheme and the improvements in public transport infrastructure either planned, or already implemented, the applicant's transport consultant predicts an increase in the expected modal shift from private car to public transport from that assumed in the consideration of the existing permission. This means that the proposed increase in capacity is not expected to result in an increase in the number of car journeys assumed in the existing permission.

### Modal Split

- 10.5.8 Out of 61,000 spectators of which 3,000 are away supporters, 77-80% are forecast to arrive by public transport. This will be principally achieved making greater use of Tottenham Hale Station which is currently not very well used on match day for arrival or departure, with only some 617 spectators using the station on arrival and 763 spectators on departure. In the future 7930 spectators are expected to use the station on arrival and 9445 spectators on departure. It also intended that greater use will be made of Wood Green and Alexandra Palace stations with 3050 spectators forecast to use these stations. The transport strategy proposes two shuttle bus services as part of the mitigation strategy - one to Tottenham Hale and the other to Wood Green and Alexander Palace stations. As well as reducing the proportion of journeys by car the provision of the shuttle bus service is predicted to reduce the congestion pre and post match at Seven Sisters and White Hart Lane stations.

### Arrival and Departure profile

- 10.5.9 At present 85% of spectators arrive and depart within 45 minutes of kick off and final whistle respectively, with some spectators leaving before the final whistle. This peak arrival and departure adds to the pressure on the public transport system, resulting in longer queuing times at stations and traffic delays and congestion on the local highway network.
- 10.5.10 The applicant has suggested that by providing better facilities at the stadium and introducing more post and pre match entertainment, some 30% of spectators (18,300) will arrive at the stadium early (60-90 minutes before kickoff); and 35.2% of spectators arriving in the local area before a match.
- 10.5.11 The TA assumes that 30% of home spectators and 5% of away supporters will delay their departure by at least 20 minutes. The Transport Assessment does not provide any evidence to demonstrate that this proportion of spectators can be retained post match for mid evening week events. However given the increase in the capacity of the stadium and the increase in demand on local transport infrastructure, it is likely that visitors will arrive in the area earlier in order to ensure that they can enter the stadium before kickoff; and in addition the

proposed attraction and retention measures will help alleviate the peak loading on the public transport system.

### Walking

- 10.5.12 White Hart Lane is the closest Station and is 6 minutes walk from the stadium. The next nearest stations are Northumberland Park station [0.8 km], Seven Sisters [2.3 km] and Tottenham Hale [2.2km].
- 10.5.13 The Transport Assessment predicts that post match there will be some 12,810 spectators walking to the Victoria Line, Seven Sisters (6,710) and Tottenham Hale (6,100) station, with 14,945 spectators walking to the local rail stations, White Hart Lane (7,930) and Northumberland Park (7,015). The Council's Transportation Officer accepts this forecast. To assist with the efficient dispersal of spectators there will need to be an agreed communication strategy. Measures would include displays that advise spectators of the queuing times at the various stations in order to encourage a more even distribution of spectators between the stations. An agreed communications strategy is to be secured in the S.106 agreement.
- 10.5.14 The applicant has submitted a revised PERS (Pedestrian Environment Review System) audit of the five main walking routes to and from the local transport interchanges.
- White Hart Lane Station , via, the High Road/ White Hart Lane and via High Road/ Whitehall Street and Love Lane
  - Northumberland Park Station via Park Lane and Shelbourne Rod
  - Tottenham Hale Station via the High Road, Chesnut Road and Monument Way, Hale Road and Ferry Lane.
  - Seven Sisters Station via High Road and Seven Sisters Road
  - To the North of the Stadium towards Enfield via the High Road
- 10.5.15 The PERS audit does not include the routes to the coach parking on West Road, Tariff Road, Brantwood Road and Pretoria Road and the section via Northumberland Park, Blaydon Walk and a section of Willoughby Park Road. However as the applicant's TA is only proposing an average 1.5% (approx 915 spectators) travelling by coach or a worst case 2% (1,220 spectators maximum), a PERS audit of the coach parking routes is not considered critical to the overall transport strategy. The Council will however be seeking to include routes to the coach parking locations as part of an overall comprehensive signage strategy of the routes to and from the development to be agreed and implemented through the event day management plans secured by the S.106 agreement.
- 10.5.16 The Transport Officer has reviewed the PERS audit for the 5 main walking routes identified above and concludes that the only route which will require direct

mitigation will be the Stadium to White Hart Lane Station route. This route scored poorly due to lack of resting points, poor personal safety due to a lack of CCTV, poor legibility due to a lack of route signage, poor quality of environment due to poor surface quality and poor directness due to parked cars and bollards.

10.5.17 In addition the PERS audit has identified some other areas where the RAG (Red, Amber, and Green ) rating is red these areas include:

- 1) Westside of Bruce Grove/High Road between Bruce Grove Station and St Loys Road, and west Side of Bruce Grove between Bruce Grove Station and Forster Road. This area is currently been reviewed jointly by the TfL and Haringey and a funded scheme is being developed to address some of these issues, hence no mitigation is required as part of this application.
- 2) Chesnut Road at the junction with Fairbanks Road. Improvements are planned for this area and £220,000 has been agreed as part of the revised S.106 agreement under planning application HGY/2010/1000 HGY/2011/2351.

### Cycle

10.5.18 The applicant's modal split prediction suggests that some 610 people will arrive and depart by cycling. This accounts for 1% of the mode share. The Transport Officer would have expected the proposed mode share to be higher (3% or more) considering that provision is being made to provide for prioritisation of a proportion of season tickets and general release tickets for local residents combined with the fact that currently some 5% (2900) spectators live within 5km of the stadium. Discussions with Islington Council has revealed that inadequate cycle parking at Arsenal's Emirates Stadium is a contributory factor in not achieving that scheme's cycling modal split target. The Council will therefore require the applicant to produce a match day cycling strategy which seeks to actively promote cycling to and from the stadium and to provide access to adequate secure cycle parking.

### Match Day Car usage

10.5.19 The existing conditions report suggests that between 37.8%-43.9% of spectators arrive in the local area by car. There is a strategy in place to reduce the number of car parking spaces available and restrict spectator's ability to easily access on street and off street car parking spaces. This combined with the proposed enhancement in public transport infrastructure and event day travel plan measures should make it possible to achieve the proposed car mode share. The key driver to achieve the proposed modal shift is behavioural change as a result of increasing the current match-day CPZ from 221 hectares to around 716 hectares. A map of the proposed CPZ can be seen in the appendices. Phase 1 of

the revised event day controlled parking zone has been implemented, and the other phases will be implemented before the stadium is completed.

- 10.5.20 The proposed expansion of the CPZ beyond the A406 will help to facilitate the free flow of buses and pedestrians along the High Road and the bus diversion route. This will help to reduce the journey time of spectators to and from the stadium. The extension of the CPZ to the west will also help to facilitate the shuttle bus service to Wood Green and Alexandra Palace.
- 10.5.21 Officers have some concerns regarding the increase in the number of car parking spaces in the stadium and the car parking allocated to the Hotel which will be utilised by spectators on an event day. The access and egress via Northumberland Park and Park Lane are located where pedestrian flows will be very high post and pre match. In order to avoid conflict between cars and pedestrians, the Council will require safeguards to be included as part of the event management plan to restrict access to and from the car park before and after games when spectator flows are at the highest (30 minutes pre match and 40 minutes post match).
- 10.5.22 Similarly, given its proximity to the stadium, the vehicular access and egress to the hotel car park which is located on the High Road frontage will need to be restricted as part of the local area management plan to a minimum of 1 hour pre and post match.

### National Rail

- 10.5.23 The revised transport assessment forecasts that some 34% of spectators will depart by rail, 20% from White Hart Lane and 14% from Northumberland Park Station. 35% of those departing from White Hart Lane will interchange at Seven Sisters Station and 21% of those departing from Northumberland Park Station will interchange at Tottenham Hale station. On arrival 21% of spectators will arrive at White Hart Lane Station and 15.8% to Northumberland Park station. Of the arrivals at White Hart Lane 31% would have interchanged from the Victoria Line, on the arrivals at Northumberland Park 17% would have interchanged from the Victoria Line at Tottenham Hale station. This reflects the current match day distribution.
- 10.5.24 The Event Day TA includes rail capacity analysis for all the local transport interchanges. The analysis includes midweek and weekend events, pre and post match. Existing and forecast local demand is included with a growth factor applied to reflect the 2021 forecast increase in local demand. Station configuration and platform capacity are also considered. The conclusion of the analysis for each interchange is as follows:

### Northumberland Park/ Tottenham Hale Station:

- 10.5.25 For the purpose of the analysis the capacity is based on a service level of 4 trains per hour and is limited at 85% of actual capacity as requested by TfL. Between 18:00 and 18:30 there is an increased demand from commuters which will impact on spectators' ability to board the first train to travel north towards Northumberland Park Station from Tottenham Hale station. This will increase the pressure on the platform between trains with 186 spectators queuing between trains. The TA assumes that the loading on the platform will not exceed capacity. TfL initially raised concerns with the vertical circulation within the station and the ability of the existing escalator to clear the platform before the next train arrives. However, it has now been accepted that the situation is acceptable subject to the implementation of a station management plan that includes provision for additional LUL staff on match days.
- 10.5.26 It is forecast that post match at Northumberland Park there will be some 1057 spectators queuing outside the station for the northbound platform. The maximum waiting time for northbound spectators is predicted to be 22 minutes from arrival to boarding a train. The maximum duration of the northbound queue is predicted to be 33 minutes. The southbound queue is forecast to be 1,099 spectators with a predicted maximum waiting time of 26 minutes. The maximum duration of the southbound queue is predicted to be 33 minutes.
- 10.5.27 The Council has concerns regarding the operation of 12 car services at Northumberland Park station, and will need assurance from Network Rail and the rail operator that selective door opening will enable 12 car services to stop at Northumberland Park. In addition the footbridge to access the southbound platform is narrow and will reduce the rate of movement from the southbound platform. The applicant will therefore need to provide a crowd management plan to support the forecast increase in passengers expected at Northumberland Park Station. The above forecast is based on use of the existing footbridge used to access the southbound platform. This bridge is expected to be replaced as part of the proposed four tracking of the line. The proposed transport strategy will therefore not be affected by four tracking of the line.
- 10.5.28 Post match it is predicted there will be some 9,270 spectators arriving at Tottenham Hale, 5,585 will arrive on foot from the stadium, 1,795 will interchange from national rail, and 1,890 will use the shuttle bus service from the stadium to Tottenham Hale. As part of the event day management plan, specific measures will be required for Tottenham Hale Station in order to manage access into the station; the queue is forecasted to be a maximum of 900 spectators and will last for 29 minutes with a maximum delay per spectator of 6 minutes.

#### White Hart Lane/ Seven Sisters Station



- 10.5.29 There will be capacity constraints for northbound services between 18:12 and 19:30 when the background demand is greatest and is combined with spectators. This will result in fans and spectators waiting between trains at Seven Sisters Station. This is predicted to result in some 1,500 passengers queuing on the northbound platform. A station management plan for this station will therefore need to be agreed and as part of the event management plan.
- 10.5.30 It is forecast that post match at White Hart Lane there will be some 518 spectators queuing outside the station for the northbound platform. The maximum waiting time for northbound spectators is predicted to be 12 minutes from arrival to boarding a train. The southbound queue is forecast to be 2,177 spectators with a predicted maximum waiting time of 29 minutes. The maximum duration of the southbound queue is predicted to be 56 minutes. The area outside the station will require sufficient space to accommodate 2,250 spectators. In the long term it is planned that a spectator queuing area will be integrated into the High Road West redevelopment. In the interim queuing for the southbound platform will be via Love Lane, Whitehall Street and on the High Road. As stated above the PERS audit has highlighted that this route will require some improvements which will need to be secured through a S.106 obligation.
- 10.5.31 Pre-Match it is forecast that 14,620 spectators will be arriving at Seven Sisters station. It is predicted that 7,208 will exit the station and walk to the ground, 3,702 will interchange to national rail northbound to White Hart Lane and 3,350 will interchange to local buses. All the flows in the pre-match situation can be accommodated by the station with the exception of the Northbound platform which will need a management strategy to prevent overcrowding pre-match week days due to the higher background demand from commuters heading north.
- 10.5.32 In the post match situation it is forecast that 12,993 spectators will depart on the southbound line. It is predicted 6,765 will arrive on foot, 4,338 will interchange from White Hart Lane station and 1,890 will interchange from local bus services. The existing conditions report has highlighted that Seven Sisters station is often closed due to overcrowding. Officers have concerns regarding the additional demand at this station resulting from spectators travelling from White Hart Lane interchange at Seven Sisters station. These passengers will get priority access to the Victoria Line platform over those spectators/passengers that are queuing at surface level. Access to the station will have to be managed to prevent congestion within the station. The TA forecasts that there will be a maximum queue of 1,784 spectators queuing on the High Road outside the station on a weekend. The queue is predicted to last 1 hour with a maximum queuing time to board the train of 16 minutes.

## Buses

- 10.5.34 Post match the High Road will be closed for a minimum of 30 minutes. As part of the previous S.106 agreement bus priority measures were secured to facilitate a bus diversion route via Northumberland Park, Willoughby Lane, Shelbourne Road, and Lansdowne Road. This measure ensured that southbound bus services are available southbound immediately post match and that the period north bound services are suspended for is kept to a minimum.
- 10.5.35 In addition the applicant is proposing to implement a shuttle bus service to Wood Green/ Alexandra Palace and to Tottenham Hale stations; the proposed shuttle bus service will account for 8.7% (5,307 spectators) on arrival and 7.7% (4,697) of spectators post match. Given that the bus journey time to Wood Green and Alexandra Palace is only some 15-20 minutes, with a maximum waiting time of 8 minutes for a bus, Officers expect many supporters would choose to use this option post match, rather than queuing for the nearer stations.
- 10.5.36 The shuttle bus to Tottenham Hale station will only cater for premium spectators (Box and Club level). In the event that the modal split target is not achieved within the first year of occupation the Tottenham Hale shuttle bus service would need to be reviewed to consider whether any further expansion of the shuttle bus service is appropriate in order to achieve the modal split target.
- 10.5.37 One of the keys to achieving the shuttle bus frequency is the implementation of the Match Day Controlled Parking Zone not only in Haringey but also in Enfield. This will reduce the number of spectator cars that are parked along the shuttle bus routes. Considering the importance of the shuttle bus in achieving the revised modal split target, the Council will require a S.106 obligation to secure the shuttle bus service level agreement in discussion with TfL. As part of the event management plan stewarding and crowd management measures will be required at the intersection of Willoughby Lane/Shelbourne Road and Park Lane to ensure that spectators accessing Northumberland Park station do not obstruct the bus diversion route. In addition as part of the shuttle bus strategy stewarding will be required at Tottenham Hale, Wood Green and Alexandra Palace to manage the arrival and unloading of buses efficiently.
- 10.5.38 The assessment of existing bus routes concluded that during the pre-match period there is a shortfall in bus services capacity providing a direct link from Seven Sisters station ( the 149, 259, 279 and 349 routes). The shortfall is due to the background demand, and it is not considered possible to provide sufficient bus capacity to mitigate these impacts on an event day. It is predicted that the delay queues for northbound bus services will encourage the majority of spectators to walk from Seven Sisters, or interchange to the rail service. This is reflected in the forecast modal split with 17.3% of spectators walking or interchanging to travel north to the stadium. The Council will be seeking improved signage along the walking route as part of the signage strategy.

- 10.5.39 Post match these routes also suffer from high demand from spectators resulting in demand exceeding capacity, the closure of the High Road post match will also impact bus frequency. Spectators will therefore choose to walk to the local train/underground stations. This is reflected in the post-match walking mode share to Seven Sisters and Tottenham Hale.

### Coaches

- 10.5.40 The revised Transport Assessment forecasts a maximum 2% mode share by coach. Officers believe that there is potential to increase the proportion of supporters who travel by coach and further reduce the car mode share, particularly if supporters groups are targeted. The Council will therefore require the applicant to submit a Coach Strategy to achieve a higher coach mode share percentage as part of the travel plan targets. It is recommended that a 5% percentage modal shift is included as a travel plan target and the applicant provide a commitment as part of the S.106 agreement to promote coach service to achieve the model split target.
- 10.5.41 The existing coach parking is located to the north east of the stadium on West Road. The Transport Assessment has proposed providing coach parking on West Road, Brantwood Road, Tariff Road and Pretoria Road. A signage strategy along routes to the proposed coach parking locations will be required as part of the walking route upgrade.
- 10.5.42 The Area Management Plan and the coach strategy should include coach routing pre and post matches, via Watermead Way and Leaside Road to ease congestion on the High Road and Northumberland Park. Coach parking for Pretoria Road should be routed via the A10, White Hart Lane away from the ground.

### Taxi

- 10.5.43 Taxis account for between 1.5% and 1.7% (915 and 1037 spectators) of the modal split prediction. It is proposed to introduce dedicated taxi drop off and collection bays as part of the highway design for Park Lane. However given the closure of Park Lane and Worcester Avenue pre-and post match and the closure of the High Road post match, dedicated taxi bays will not provide any substantial benefit to taxis on a match days. Taxis will drop off and collect passengers on the High Road where possible.

### NFL

- 10.5.44 The TA forecasts that the proposed NFL match day scenario which will have fewer people arriving by car than for football matches. This is largely due to the origins of the trips being more dispersed. Only some 15% or 9,150 of spectators

are predicted to arrive by car. This will increase the loading on public transport with more spectators using the Victoria Line and the rail service to arrive and depart. The shuttle bus will be provided as on standard match days.

- 10.5.45 NFL games will take place at weekends with kick off at 14:30 and final whistle at 18:00. All the service uplift and transport infrastructure will remain the same as for a Premier League game. The Council's Transport Officer's review of the TA in respect of NFL is set out below.
- 10.5.46 The forecast arrival profile of NFL spectators at the Stadium is similar to that of football spectators with approximately 70% of spectators arriving at the stadium 45 minutes before kickoff. However due to the nature of NFL games 40% of fans are expected to arrive in the area earlier to spend time in organised fan parks. The applicant is proposing that by providing retention measures within the stadium they will achieve a lower peak departure profile with only 45% of spectators departing within 30 minutes at the end of an NFL game compared to 85% of spectators departing within 30 minutes at the end of a typical foot ball match.
- 10.5.47 The Council's Transport Officer considers the forecast of 40% of fans arriving earlier to be achievable. However additional measures are likely to be required to achieve the applicant's forecast of 55% of fans remaining within the stadium 30 minutes after the game has ended. A range of retention measures will therefore need to be agreed by the local planning authority before the stadium is occupied.
- 10.5.48 Based on the above departure profiles no queues are expected at White Hart Lane station on the northbound platform, 877 spectators are expected to queue for southbound trains, the queue is forecasted to last some 45 minutes with no single spectator predicted to queue for more than 16 minutes post match.
- 10.5.49 Northumberland Park will have a maximum queue length of 64 people travelling northbound with a maximum queuing time of 16 minutes, and maximum queuing time per spectator of 1 minute. The southbound service is predicted to have a maximum queue of 534 spectators and will last some 30 minutes with a maximum spectator queuing time of 14 minutes.
- 10.5.50 Pre-match there will be some queuing for northbound spectators travelling towards the stadium from Seven Sisters station, when interchanging from underground to rail, as some spectators will not be able to get on the first train. However this will be mitigated by the revised station management plan as part of the event management plan to be agreed by TfL. It is predicted that post match at Seven Sisters Station there will be a maximum queue outside the station of 101 spectators, the queue will last for 16 minutes, with a maximum queuing time of one minute per spectator.

- 10.5.51 The TA forecasts that Tottenham Hale will be used by 18% of spectators pre NFL match and 23% of spectators post match. Some additional station management measures will be required as part of the event day management plan to be secured as part of the S.106 agreement. It is predicted that some 400 spectators will be queuing, with the queue lasting for approximately 22 minutes and with a queuing time 2 minutes per spectator.

### Concerts

- 10.5.52 When in use as a concert venue the Stadium will have a capacity of between 45,000 and 55,000 visitors. This is a 10,000 increase in the capacity compared to the previous approved scheme.
- 10.5.53 Officers agree with the submitted TA's conclusion that a concert would generate fewer trips by car due to the nature of the event with spectators travelling further to attend these events. Consequently there will be greater demand for public transport services. It is forecast that only 10% of visitors will travel by car. It is predicted approximately 50% of visitors will arrive at least 75 minutes before the concert begins. The departure profile will see some visitors departing before the concert ends, only 16% of visitors will remain post concert. Officers consider the proposed arrival and departure profiles are realistic and accurately reflect the potential loading on the public transport system.
- 10.5.54 Due to the forecasted departure profile with 65% of visitors departing within 15 minutes of the concert ending, a 55,000 capacity concert will result in post concert queuing for the southbound service at Northumberland Park. The queue is forecasted to last 90 minutes with a maximum queue size of 2031 visitors, the maximum queue per individual is predicted to be 47 minutes. The queue for the northbound service is forecast to be 15 minutes.
- 10.5.55 The queue at White Hart Lane will last for some 65 minutes with a maximum waiting time of 29 minutes. Seven Sisters will have a queue of 2,131 visitors, with maximum queue duration of 40 minutes, with a visitor waiting in the queue for at least 13 minutes. Tottenham Hale will have a maximum queue size of 2,531 with queue duration of 63 minutes, and a maximum wait per individual of 15 minutes. Shuttle bus service would be provided with the levels of service secured by the S.106 agreement.
- 10.5.56 Officers acknowledge that a 55,000 capacity concert will result in substantial queuing at the local public transport interchanges post the event. However providing the mitigation measures identified above for the football are also in place for concerts the impacts of the proposed concert can be managed.

### Non-Event Day Assessment

- 10.5.57 The trip generation methodology utilises some of the existing trip rates from the TRAVL database from the previous applications to in order to predict the trip rates for the proposed hotel and health centre.
- 10.5.58 Trip rates for the Stadium Conference, Tottenham Experience, Sky Walk and Extreme Sports uses are forecast from first principles.
- 10.5.59 The following annual visitor numbers are forecast:
- Stadium conferencing: 81,180
  - Tottenham Experience: 120,000
  - Sky Walk 96,600
  - Extreme sports 100,000
- 10.5.60 The current proposal also includes 4,000 sq.m. of flexible community or B1 use. This aspect of the development has been assessed based on B1 use which represents the worst case scenario. This element of the development will not have access to dedicated off street car parking spaces and will have to utilise the 56 pay and display car parking spaces on Worcester Avenue. It is assumed that the proposed office will have up to 250 employees; with trip rates calculated using comparable data from similar uses.
- 10.5.61 The applicant's transport consultant has forecast the trip rates for the residential element of the scheme by comparing data surveys of sites located in Islington on the Holloway Road. Although these sites are in inner London, the Council's Transport Officer consider these are acceptable given the high PTAL rating for the site and restricted on-site parking of 0.47 spaces per unit including wheelchair accessible car parking.
- 10.5.62 The trip generation during the 7am-9am and 4pm-7pm peak periods have been forecast as follows:
- 1,871 two-way person trips during the morning peak (738 in and 1133 out); and
  - 2,536 two-way trips during the evening peak periods (1420, in and 1112 out).
- 10.5.63 Based on the then predicted modal split the previously approved schemes (HGY/2011/2350 and HGY/2011/2351) forecast the following vehicular trip generation:
- 151 in/out trips during the AM peak period; and
  - 112 in/out trips during the PM peak period.
- 10.5.64 Based on the predicted modal split for the current application the following vehicular trips are forecast for the current application:
- 111 in/out trips during the AM peak period; and

- 111 in/out trips during the PM peak period.

10.5.65 The stadium element of the proposal is forecast to generate additional vehicular trips based on conference and other events utilising the stadium car park. The revised TA proposes restricting access to the stadium car park to all but essential conference and event organisers, with all other visitors utilising the 56 shared pay and display car parking spaces on Worcester Avenue. This will suppress the car mode share. The use of the stadium car park on non-event days will be restricted and reviewed by way of a S.106 obligation as part of the parking management plan.

10.5.66 In summary the proposed non event day aspect of the development will have limited car parking provision, with dedicated car parking only provided for the residential and hotel elements of the development. Officers are satisfied that this, combined with the recently implemented all day North Tottenham CPZ, supports the forecast trip generation on non-event day set out in the transport assessment.

10.5.67 In addition evidence provided in the transport assessment demonstrates that there has been a reduction in the annual/ daily traffic flow along Tottenham High Road since 2010. Between 2001 and 2011 there has been a reduction in the average daily traffic flow along the High Road next to the stadium of 18% between, down from 16,708 to 13,583 vehicle movements per day.

### Impact on Public Transport

10.5.68 The Transport Assessment forecasts that of the non-event day public transport trips generated by the development:

- 32% of all trips will be via White Hart Lane Station;
- 13% via Northumberland Park Station;
- 30% via bus to Seven Sisters Station in order to access the Victoria Line; and
- 24% by bus as the main mode.

10.5.69 Officers accept the predicted modal split.

10.5.70 The development will generate some 1377 two way public transport trips over the 3 hour AM peak period and 1,928 two way trip public transport trips over the 3 hour PM peak period. Given the planned improvements to local public transport infrastructure, officers are satisfied that with the predicted distribution of trips the proposed development would not adversely impact on the public transport system.

### Cycling

- 10.5.71 The submitted TA forecasts that cycling will account for some 5.2% of trips during the AM peak period and 3.8% of trips during the PM peak period. Officers however feel that there is potential to increase cycling's mode share. The applicant will therefore be required to implement a non-event day cycling strategy to be agreed with the Council. It should consider measures such as visitors' cycle parking and changing rooms, showers and lockers for staff. These measures will be reviewed annually as part of the Travel Plan.

#### Car parking and cycle parking provision

- 10.5.72 The proposed development includes 270 car parking spaces for up to 585 residential units which equates to 0.47 car parking spaces per unit. This is in line with the 2015 London Plan and Haringey's Saved UDP Policy M10. The Council will require 20% of car parking spaces to have electric charging points with a further 20% of spaces capable of being easily fitted with electric charging points.
- 10.5.73 All wheelchair accessible units will require a disabled parking space. A parking management plan will need to be agreed with the Council.
- 10.5.74 Cycle parking will be incorporated in to each of the 4 residential towers. The exact number of units and mix will be determined at reserved matters stage. The indicative mix indicates the following:

Tower A will have up to 67 units 261 cycle spaces.

Tower B will have up to 91 units and 127 cycle parking spaces.

Tower C will have up to 231 units and 357 cycle parking spaces.

Tower D will have up to 91 units and 127 cycle parking spaces.

5 x three bed maisonette units on Park Lane will have their own cycle parking provision.

- 10.5.75 The number of residential cycle parking spaces indicated is in line with the London Plan. However no provision is made for visitor cycle parking. The Council will require details of the numbers and location of visitors' cycle parking as part of the Travel Plan.

#### Hotel and serviced apartments

- 10.5.76 The proposed hotel will have 180 bedrooms and 49 serviced apartments and 76 car parking spaces. Officers consider the proposed parking provision to be high considering the good public transport accessibility of the site. The London Plan considers that in locations with PTAL of 4-6 parking provision should be limited to operational needs and parking for disabled persons. The applicant will be required to submit a parking management plan, which will limit the use of these car parking spaces for operational use only and should include details on how car



parking will be allocated and managed. 10% of parking spaces will need to be wheelchair accessible. 10% of parking spaces should be provided with electric charging points with a further 10% capable of being easily fitted with charging points. In line with the requirements of the London Plan the applicant will also have to provide cycle parking at 1 space per 20 beds for long stay and 1 space per 50 bed for short stay. These measures will be required as part of the Hotel Travel Plan to be secured by way of a S.106 agreement.

### Health Centre

10.5.77 The proposed Health Centre is expected to serve mostly local people. The Transport Assessment predicts that most of the trips generated by this element of the scheme will be by walking, cycling or public transport. No car parking is provided for this element of the scheme. However, the revised highways layout on Worcester Avenue will include 56 pay and display car parking bays, which includes 8 disabled spaces. Officers consider these spaces will be sufficient to serve the car parking needs of the Health Centre. No details of cycle parking have been provided for this element of the scheme. These will have to be secured by way of condition as part of the Travel Plan.

### The Tottenham Experience

10.5.78 The Tottenham Experience, which includes the Club shop, museum, cafe, cinema, ticket office and Sky Walk, will not have any dedicated car parking spaces. Visitors will be able to make use of the proposed pay and display car parking spaces on Worcester Avenue. The applicant will be required to provide cycle parking in line with the 2015 London Plan, to be secured as part of the Travel Plan by S.106 agreement.

### Conference/ Banqueting and other Stadium non-match day related activities

10.5.79 Parking for these activities will be provided in the stadium car park which has 822 car parking spaces including 90 wheel chair accessible spaces. However, it is proposed that the use of the stadium car park will be restricted to essential visitors only, to reduce travel by car. As part of the car parking management plan to be agreed with the Council, officers will require non-event day car parking within the stadium be restricted to ensure that the 219 in/out vehicular movements during the AM period predicted for the existing planning permission. Officers will therefore agree a cap through the car parking management plan. This cap should not be exceeded except with the agreement of officers, and only if trip generation and junction modelling analysis is provided to demonstrate that a higher percentage of parking allocation can be accommodated on site without impacting on the highways network.

### Cumulative impact Assessment

- 10.5.80 The applicants transport consultant has provided a transport note detailing the cumulative impact of trips generated by the event and non-event day elements of the development.
- 10.5.81 Events involving more than 10,000 spectators will be classified as major events which will trigger the activation of the Local Area Management Plan (LAMP). Amongst other measures the LAMP will remove the 56 short stay pay and display parking on Worcester Avenue, and place management restrictions on access to the hotel and residential car parks. Officers are satisfied that measures in the LAMP will be sufficient to manage cumulative vehicular impacts on event days.
- 10.5.82 Officers are satisfied that there will be no significant cumulative impact on public transport during event days as the majority of events are expected to take place at weekends or weekday evenings outside the peak demand for non-event day related trips. In addition demand is predicted to be in opposite directions with spectators travelling towards the stadium and employees/ visitors travelling away from the stadium. The only element of the proposal that will add to spectator loading on the public transport system are trips related to the proposed residential element of the scheme. However this has been accounted for in the background growth factors which have been included in the event-day assessment.

### Road Safety

- 10.5.83 All the junction improvements proposed as part of the development will be reviewed by Haringey's Highways Team to ensure that the safe movement of pedestrians, cyclists and vehicles is considered at all times. All design proposals will undergo an independent Stage 1 and 2 Road Safety Audit.

### Delivery and Servicing and Construction traffic

- 10.5.84 The supermarket and stadium will share a service access located on Northumberland Park. This access would be used for supermarket and stadium deliveries and refuse collection. This access will be used by rigid vehicles 10 metres long and articulated vehicles up to 16.5 metres long. Swept paths analysis in Drawing BHC-1071 demonstrates that an articulated vehicle can enter and exit the site in a forward gear.
- 10.5.85 Servicing of the other elements of the development to the south of the stadium will be from Park Lane and Worcester Avenue. The revised highways layout includes service and delivery bays which will be used to service the development to the south.

10.5.86 The developer will be required to provide service and delivery plans for each aspect of the development which seek to coordinate deliveries to each aspect of the development and reduce the number of deliveries to the development as a whole.

### Highways Design

10.5.87 The works associated with the completed northern phase of the original NDP scheme (supermarket, THCF offices and university technical college) have been implemented.

10.5.88 In relation to the highways works for the stadium and southern development, the applicant is proposing to revise the layout to include the following:

1. Improvement to pedestrian crossings
2. A new vehicle access to the stadium car park and hotel parking from the High Road.
3. Alternations to the junction of Park Road and the High Road, including improvements to pedestrian facilities.
4. The provision of loading/delivery/waste collection bays on Park Lane and Worcester Avenue for the hotel and residential development.
5. Provision of a taxi rank opposite the hotel. This will be suspended on event days.
6. The junction of Park Lane and Worcester Avenue is modified to accommodate the swept path of the larger outside broadcast vehicles based in the compound on Worcester Avenue.
7. The introduction of hydraulic bollards at each end of Worcester Avenue, to be controlled by the stadium security managers.
8. The introducing of non-match day parking on Worcester Avenue including wheelchair accessible car parking to service the non-match day activities including the new health centre.
9. The construction of two 'bell mouth' accesses onto Worcester Avenue to access the stadium (basement and ground floor area) and the residential development car parking.

10.5.89 The applicant has also included details of additional improvement to the highways including footways surrounding the site as a part of a cohesive landscaping scheme which includes both private and public highway. The implementation of these works is expected to be carried out in phases throughout the development process (and would need to be secured by condition). A S278 agreement would be required in order for the works to be implemented.

### Mitigation

10.5.90 As part of the HGY/2010/1000 application grant funding of £3.5 million was allocated by the GLA to mitigate the local impacts generated by the development with match funding from the Council of £500,000 for works to Worcester Avenue, the funding allocation is as follows:

1. Highways works in relation to Phase 1 (Supermarket, university technical college), £1,160,000, and these works included signalised crossings as the junction of High Road with Northumberland Park and White Hart Lane.
2. Phase 1 and 2 CPZ works £980,000 allocation works are ongoing and works to date include implementation of an all week CPZ around the core of the development, changes to the existing match day CPZ including extending the CPZ to the west and south of the existing match day CPZ boundaries, further work are planned for this and next financial year.
3. Phase 2 Highways (£1,360,000) these works will be implemented to support the increase in the capacity of the stadium. The works include bus priority measures on Northumberland Park, Willoughby Road, Shelbourne Road and Lansdowne Road, improvements to Chestnut Road, new pelican crossings on the High Road, and new crossing point at Park Lane Junction with Shelbourne Road.
4. Worcester Avenue £500,000 for the upgrade of Worcester Avenue post the stadium construction.

10.5.91 The transport assessment prepared by the applicants assesses the impacts of each element of the development on event days (and for a range of events types) and on non event days. The assessment identifies a number of capacity issues within the public transport and road network, and deficiencies in existing highway/transport infrastructure that needs to be addressed by the application. This amounts to a package of measures and restrictions detailed below.

#### 10.5.92 Conditions

- Servicing and delivery plan, further swept path analysis and evidence that articulated vehicles can enter and leave the megastore service yard in forward gear.
- Restrictions on the use of the stadium parking including- team coach drop off area restricted to team coaches;
- Supervision by trained stewards of entry and exit for drop-off;
- A vehicle management plan for the use of the car park;
- All parking to be allocated and restrictions on times of entry and exit;
- Provision of a Construction Management Plan and Construction Logistics plan;

#### 10.5.93 Section 106 obligations

- To achieve the modal split target within the first year of occupation;
- If this is not achieved to implement further measures;

- Provision of a shuttle bus strategy;
- The implementation of the recommendations of the PERS audit prior to occupation of the stadium;
- Submission of a cycling strategy;
- The prioritisation of a proportion of tickets for local residents;
- Funding for the expansion of the CPZ if necessary;
- Operations plans and stewarding plans for Seven Sisters and Tottenham Hale stations in conjunction with TfL;
- Provision of a communication strategy;
- Stewarding of bus stops;
- The provision of match day parking restrictions and road closures and hydraulic bollards; Provision of a residential and commercial travel plan;
- Car club scheme;
- Site parking management plan; Restrictions on eligibility for parking permits;
- The provision of necessary highways works.

### **Transport conclusion**

- 10.5.93 On reviewing the transport assessment and supporting documentation, officers agree that the development proposal can be adequately accommodated on the Highways and transport network subject to the applicant agreeing to enter into measures set out above to be secured by S.106 obligation and S.278 agreement, and subject to conditions, to help secure the modal split target for the event day activities and to mitigate the impacts of the proposed non-event day activity on the Highway and transport Network.
- 10.5.94 Officers have reviewed the proposed development's impact on the public transport network and have made a number of recommendations to ensure the development proposal does not adversely affect buses, rail and the underground. The review of the operation of the rail stations concluded that spectators will have to queue longer than they currently do. However there is sufficient rail capacity at White Hart Lane and Northumberland Park to deal with the increased demand. Subject to conditions and section 106 agreement the proposal accords with regional and local planning policies.

### **10.6 ENERGY/SUSTAINABILITY**

- 10.6.1 The NPPF and London Plan Policies 5.1, 5.2, 5.3, 5.7, 5.8, 5.9, 5.10 and 5.11, as well as Policy SP4 of Haringey's Core Strategy set out the sustainable objectives in order to tackle climate change. Information is sought regarding how far development proposals meet Carbon reduction targets, District Heating proposals and where sustainability measures such as the use of rainwater harvesting, renewable energy, energy efficiency, etc are included as part of the proposals.

## Climate change mitigation

- 10.6.2 London Plan Policy 5.2 requires major planning applications to attain a 40 per cent carbon dioxide emissions improvement on 2010 Building Regulations Part L, and such major developments should include an energy assessment to demonstrate how the carbon dioxide emissions reduction targets are met.
- 10.6.3 In line with the energy hierarchy the applicant has modelled energy efficiency savings for the detailed element of the application and this is estimated to achieve a reduction of 5% in regulated carbon dioxide savings compared to Part L of Building Regulations 2013. Given that phase 2 of the application is in outline it is not possible to model these savings at this stage. Further details of how these savings have been calculated has been conditioned to be submitted for the first phase prior to works above ground.
- 10.6.4 The applicant presented three energy options for the development: option a: connection to a District Wide Heating network; option b: provision of a single energy centre on-site and a site wide network; and option c provision of multiple energy centres on-site and no connection to a site wide network.
- 10.6.5 The applicant is committed to connecting to a District Wide Heating network if one is delivered in the area. The energy calculations submitted assumes such a connection. The Council and the Club are working with the GLA on bringing this forward. The application does not provide for the District Energy Centre (to serve the District Wide network) on the site. The Club has investigated the possibility of providing for the district energy centre to power the district wide heating network on its site, and this would be the preference of the Council and the GLA, however the design does not allow sufficient space on this tight site.
- 10.6.6 The Council, with the GLA and DECC, since 2010 has undertaken technical and financial feasibility studies into district energy in North Tottenham. These have shown that North Tottenham should be served by an energy network generating heat and electricity.
- 10.6.7 These studies highlight that a North Tottenham district energy network could deliver:
- A reduction in the boroughs carbon emissions by nearly 2%;
  - An 8% internal rate of return (IRR) on investment over 25 years;
  - Heat in an efficient manner through connection to the Eco-Park and use of its waste heat;
  - Wider social-economic objectives of regeneration by reducing energy costs for residents (both existing and new);
  - Support to developers through connection to a low carbon energy source, helping them achieve required planning targets;

- Local electricity grid support and help deliver the electricity needs of North Tottenham's regeneration.
- 10.6.8 Once the preferred location of the area wide network energy centre is confirmed the details of the network and full costings will be identified. Studies have shown that the area wide centre could be located on the Tottenham Hotspur site, but the constraints of the development currently prevent this. The Council has recently appointed Deloitte to deliver the detailed financial business case. This alongside previous studies will enable capital funding to be secured and to move to project delivery for North Tottenham.
- 10.6.9 Until the district wide network comes on-line and, in any event, prior to the development of the latter phases of the development Phase 1 of the development (the stadium, the Community Health Centre and the Tottenham Experience) will be connected in a network with a single energy centre situated in the Stadium.
- 10.6.10 Should the District Network not come forward the site will be linked in a site wide network with a single connection out of the site (option b). Subject to the provisions within policy around feasibility and viability, space has been identified within the residential development for a single energy centre. The application is conditioned such that the multiple energy centres should be decommissioned when the site connects to the District network or to its own single energy centre. The provision of details of the connecting pipework and a single connection to enable connection to the District Network has also been conditioned. The energy strategy does set out a fallback solution of multiple energy centres, operating individually if these options do not come forward (option c). Option c is not in line with London Plan policy and the above conditions prohibit the implementation of this.
- 10.6.11 Based on the District Wide solution the proposal would achieve a reduction of 17% in carbon dioxide emissions against Part L of Building Regulations 2013, from this stage of the energy hierarchy. If connection to the District network is not possible then the applicant intends to install a 770 kwe gas fired CHP to serve the first phase situated in an energy centre in the stadium, this would form the first phase of any of the options referred to above
- 10.6.12 The applicant has investigated the use of photovoltaic panels on the stadium and due to its lightweight construction this has not been possible. Whilst this is disappointing this is accepted. Photovoltaic panels are proposed on top of the residential blocks and these generate a 0.5% reduction in carbon emissions.
- 10.6.13 Overall, taking account of the submitted energy strategy, a 22.5% reduction in carbon emissions is predicted. This falls short of the 35% London Plan target. London Plan policy sets provision for the payment of a carbon-offsetting tariff should the 35% target not be reached. Given that Phase 2 of the scheme is in

outline, and that there is uncertainty with regard to the delivery of the District Network, the submission of a further energy strategy has been conditioned. The level of carbon offsetting tariff due will need to be calculated at this time and it will be payable prior to the occupation of each element of the proposal, subject to viability.

- 10.6.14 Further information is needed on the cooling demands of the development and the submission of detailed thermal modelling has been conditioned.
- 10.6.15 Back-up diesel generators are proposed and this approach is acceptable provided they are only for exceptional use and this will be secured in the section 106 agreement. The air quality implications are dealt with below.

### **Climate change adaptation**

- 10.6.16 Flooding and surface water drainage issues are dealt with in the sections below.
- 10.6.17 Rainwater harvesting is not proposed for Phase one given the constraints of the design and this is accepted.
- 10.6.18 The application is conditioned such that water use is managed on the site and water use in the residential towers is limited to 105 litres per person per day.

### **Conclusion**

- 10.6.19 Subject to conditions and section 106 agreement the proposed climate change mitigation and adaptation strategies are considered to comply with London Plan policy and local planning policies and as such are acceptable.

## **10.7 DAYLIGHT/SUNLIGHT/ MICROCLIMATE IMPACTS ON RESIDENTIAL AMENITY**

- 10.7.1 Saved UDP Policy UD3 states that development proposals are required to demonstrate that there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking. Similarly London Plan Policy 7.6 requires buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy.
- 10.7.2 The nearest existing residential properties that would be most affected by the siting and scale of the proposed development are:

- 3-57 Northumberland Park (odd)
- Burleigh Court



- 19 Bennets Close
- 9-13 Bennets Close
- 50 Northumberland Park
- 52 Northumberland Park
- 2-18 Worcester Avenue (even)
- 1-41 Worcester Avenue (odd)
- Northumberland Park Community School/ Sports Centre/ Resource Base
- St Paul's and All Hallows Infant School
- 28-56 Park Lane (even)
- 1 Lancaster Close
- 2 Lancaster Close
- 3 Lancaster Close
- Concord House
- 2/2a Park Lane
- 2 Vicarage Road
- 28 Bromley Road
- 29 Bromley Road
- 38 Bromley Road
- Coombes House
- 705 High Road
- St Francis De Sales Primary School
- 729 High Road
- 4-18 Bereton Road
- Library/Kathleen Ferrier Court
- 731-805 High Road (odd)
- Bergen/ Brooklyn Apartments
- 809 High Road
- 813-827 High Road
- 820 High Road
- 814 High Road
- 808 High Road
- 806b High Road
- 806 High Road
- 804 High Road
- 794 High Road
- 790 High Road
- 7 White Hart Lane
- 9-39 White Hart Lane
- 8 William Street
- 1 Moselle Street
- Ermine House

## **Daylight/sunlight**

10.7.3 A total of 1589 windows serving 917 rooms within 147 properties have been assessed for daylight and 508 windows within 84 properties for sunlight.

10.7.4 The Applicant has submitted a daylight and sunlight assessment as part of its Environmental Statement. This assesses the impact on daylight through a measure known as “Vertical Sky Component” (VSC) and ‘No Sky-Line’ (NSL).

10.7.5 The BRE guidelines state that:

*“if the VSC, with the development in place, is both less than 27% and less than 0.8 times its former value, occupants of the existing building will notice the reduction in the amount of skylight. The area lit by the window may appear more gloomy and electric lighting will be needed more of the time”.*

10.7.6 With regard to applications where there is an extant planning permission on a site, Appendix F2 of the BRE Guide states:

*“Sometimes there may be an extant planning permission for a site but the developer wants to change the design. In assessing the loss of light to existing windows nearby, a local authority may allow the vertical sky component (VSC)...for the permitted scheme to be used as alternative benchmarks. However, since the permitted scheme only exists on paper, it would be inappropriate for it to be treated in the same way as an existing building, and for the developer to set 0.8 times the values for the permitted scheme as benchmarks”.*

10.7.7 With regard to NSL the BRE Guidelines set out the following:

*A room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area.*

10.7.8 Levels of sunlight are measured through an assessment of Annual Probable Sunlight Hours (APSH). With regard to existing surrounding receptors, the BRE Guidelines provide that *a window may be adversely affected if a point at the centre of the window receives for the whole year, less than 25% of the APSH, including at least 5% of the APSH during the winter months (21st September to 21st March) and less than 0.8 times its former sunlight hours during either period, and if there is a reduction in total APSH which is greater than 4%.*

10.7.9 The resulting levels of daylight and sunlight as well as the impacts were considered acceptable in planning terms by the local authority for the consented scheme. It should also be noted that a number of properties enjoy a significant benefit due to their proximity to a cleared site and as such this impacts on their score.

- 10.7.10 Out of the 1589 windows assessed, 1056 (66%) have a baseline VSC equal to or greater than 27% whereas 766 (84%) out of the 917 rooms assessed have a daylight distribution to at least 80% of the total room area. With regard to sunlight out of the 594 windows assessed, 674 (88%) meet the BRE guidelines for sunlight in the baseline.
- 10.7.11 After the development is constructed out of the total 1589 windows assessed 954 (60%) meet the BRE criteria for VSC whereas 696 (76%) of the 917 rooms assessed meet the criteria for NSL. As such 102 windows are adversely affected in terms of VSC and 70 in terms of NSL.
- 10.7.12 In regards to daylight, 954 (60%) of the 1589 windows assessed will meet the BRE guidelines for VSC compared to 66% in the baseline whereas 696 (76%) out of the 917 rooms assessed will meet the criteria for NSL compared to 84% in the baseline. 76 properties will experience a negligible effect whereas the remaining 71 properties will experience adverse effects ranging from minor adverse with instances of moderate to major adverse. However, as the room uses for these properties are unknown there is a possibility that many of the windows/rooms expected to experience significant adverse impacts could serve/be bedrooms which are considered less sensitive to daylight conditions and sunlight than living rooms. There is also a possibility that a number of the windows/rooms assessed could also serve/be bathrooms, circulation space, ancillary rooms or commercial which are not considered relevant for assessment for daylight and sunlight as per the BRE.
- 10.7.13 In regards to sunlight, 432 (85%) out of the 508 windows assessed will meet the BRE guidelines for APSH compared to 96% in the baseline. The likely residual effects would be negligible for 60 properties whereas the remaining 24 properties will experience adverse impacts ranging from minor to moderate adverse. The moderate adverse effect is predicted for the residential terraced properties 11 and 15-41 Worcester Avenue as a result of the close proximity of the properties to the site. As with daylight, the high levels of existing sunlight cannot be expected to be maintained given the aspirations to regenerate the site and surrounding area.
- 10.7.14 With regard to the extant permission there was a moderate to major effect on sunlight to 31-41 Worcester Avenue and a moderate effect on daylight predicted to Concord House on Park Lane and Kathleen Ferrier Court to the west on the High Road. As such the impact of the new scheme is slightly more than the consented scheme.
- 10.7.15 It is worth noting that the BRE standards are not policy but are universally recognised guidance which is used in order to determine the acceptability of levels of daylight/sunlight within new development.

- 10.7.16 It should also be noted however that the 27% VSC recommended guideline is based on a low density suburban housing model and in an urban environment it is recognised that VSC values in excess of 20% are considered as reasonably good, and that VSC values in the mid-teens are deemed acceptable.
- 10.7.17 Paragraph 2.3.29 of the GLA Housing SPD supports this view as it acknowledges that natural light can be restricted in densely developed parts of the city. In applying this methodology, the total number of windows which would receive an acceptable level of direct light from the sky increases to 72%.
- 10.7.18 There is also some impact of loss of daylight and sunlight with regard to a small number of the windows of the surrounding schools, however this impact is not considered to be significant.
- 10.7.19 Overall, given the location of the site in an urban area, and taking account of the existing site conditions, the proposal is not considered to have a significant impact on local amenity and as such is in line with planning policy.

### **Overshadowing**

- 10.7.20 The BRE guidelines recommend that at least half of a garden or amenity area should receive at least 2 hours of sunlight on March 21<sup>st</sup> or the area which receives 2 hours of direct sunlight should not be reduced to less than 0.8 times its former value (ie no more than a 20% reduction).
- 10.7.21 Given the relatively modest height and massing of the existing site there is little overshadowing of the general amenity spaces and surrounding area in the baseline condition on 21 March, 21 June and 21 December.
- 10.7.22 Some of the areas surrounding the site do however already experience some overshadowing, most notably the playground of St Paul's and All Hallows Infant and Junior School, the grounds of Northumberland Park Sports Centre and Community School and residential properties on Worcester Avenue.
- 10.7.23 The development will give rise to additional overshadowing to the school grounds and playing fields of St Francis De Sales RC Junior School, the Northumberland Park Community School and Sports Centre and St Paul's and All Hallows Infant and Junior Schools. Overshadowing will be brief and will pass quickly. There will also be some additional overshadowing to some of the private gardens to Worcester Avenue. The Environmental Statement describes the increased overshadowing on 21 December, ie the worst case as the shadows are longer, as minor to moderate adverse significance. Although the proposed development does increase the overshadowing this is not in the round considered to be significant and therefore is acceptable.

## **Solar glare**

10.7.24 In regards to solar glare the majority of the viewpoints will experience negligible to minor adverse effects. There is one instance of a moderate adverse effect. The instances of reflection identified will likely be brief in nature and do not obstruct a driver's line of sight or a view of any traffic signals. These are not considered to be material and as such the proposal is considered to be acceptable and in line with policy

## **Wind mitigation**

10.7.25 With the introduction of proposed landscaping and wind mitigation, all locations in and around the site are considered suitable in terms of pedestrian safety, throughout the year and for all phases of construction.

10.7.26 While the majority of locations are considered comfortable for the intended use with the introduction of proposed landscaping and wind mitigation, there are some areas that remain unsuitable in terms of pedestrian comfort during the various construction stages and for the completed project. This is a change from the extant permission.

10.7.27 Given the location of these areas and that they are only intended for passing through this is considered acceptable in this instance and as such the proposal is acceptable and in line with policy in this regard.

## **Light pollution**

10.7.28 New street lighting is proposed to the High Road, Park Lane and Worcester Avenue together with lighting for the podium, surrounding trees, floodlights for the stadium, and architectural lighting within the Stadium skin. All of this lighting has been designed to avoid light spill as far as possible. Some brightening of the sky portion above the stadium is typical of sports installations when the floodlighting is in use and the applicant sets out that the resulting brightness is likely to be in line with other stadia of a similar nature.

10.7.29 Submission of an architectural lighting strategy and event day lighting strategy for approval by the Local Planning Authority is conditioned. On this basis the proposal is in line with policy and is considered acceptable.

## **Overall conclusion on impact on amenity**

10.7.30 London Plan and Local planning policies set out that there should be no significant impact on local amenity. Taking account of the technical studies submitted in the environmental statement and the urban setting of the site and its current

condition the proposal is not considered to have a significant impact on local amenity and as such is in line with planning policy.

## 10.8 DRAINAGE/FLOOD RISK

10.8.1 Local Plan Policy SP5 and London Plan Policy 5.12 seek to address current and future flood issues and minimise risks in a sustainable and cost effective way. London Plan Policy 5.13 sets out the drainage hierarchy for Sustainable Drainage Systems (SUDS) so greenfield run-off rates are achieved and that surface water run-off is managed as close to its source as possible:

1. store rainwater for later use;
2. use infiltration techniques, such as porous surfaces in non-clay areas;
3. attenuate rainwater in ponds or open water features for gradual release;
4. attenuate rainwater by storing in tanks or sealed water features for gradual release;
5. discharge rainwater direct to a watercourse;
6. discharge rainwater to a surface water sewer/drain; and
7. discharge rainwater to the combined sewer

10.8.2 In line with the NPPF Local Plan policy SP5: 'Water Management and Flooding' sets out the Council's requirement that all development in Haringey to where necessary mitigate flood risk and employ sustainable drainage systems. Policy DM35: 'Managing and Reducing Flood Risk' and DM37: 'Sustainable Drainage Systems' of the emerging Development Management Policies DPD set out in more detail how flood risk and sustainable drainage should be dealt with in planning applications. The site is located predominantly within Flood Zone 1 with a small portion of the site within Flood Zone 2.

10.8.3 The site is also generally free from surface water flooding, although a significant stretch of the A10 Tottenham High Road adjacent to the site is shown to be at risk from surface water flooding. The proposed scheme introduces on site measures to retain surface water within the site, and as a result it is predicted that run off from the site onto the A10 will be reduced.

10.8.4 The Supplemental Drainage Report dated 9 November confirms the following sustainable drainage measures will be employed within the scheme:

- Permeable paving of all external areas of public realm.
- Surface water storage within the sub-base of public realm areas.
- The moveable pitch will retain water within a permeable layer beneath the surface.
- The artificial surface beneath the moveable grass pitch will be also be permeable with surface water storage below the surface.
- Stadium roof will be drained into attenuation tanks within the stadium

basement.

- Green roofs on the residential buildings.
- Attenuation tanks within the structure of buildings –to minimise the need for basement storage tanks that necessitate pumping.

- 10.8.5 The Council's Senior Drainage Engineer is satisfied that the applicant has optimised sustainable drainage measures given the constraints of the site. The new proposal will achieve the brownfield discharge rates previously agreed with the LPA as part of the existing planning permission for the site.
- 10.8.6 The Council's Senior Drainage Engineer notes that pumping would still be included, which is not a preferred solution, however accepts that given the constraints of the site, and the nature of the scheme, some element of pumping cannot be avoided. The applicant's consultant has demonstrated concepts that would minimise the need for pumping, The Council's Senior Drainage Engineer advises that these concepts should be explored at the detailed design stage as the various components of the drainage strategy come forward.
- 10.8.7 In conclusion the application and information submitted is acceptable and in accordance with planning policy subject to the inclusion of the following conditions:
1. Further details of drainage proposals to be approved as the scheme is developed.
  2. Completion and Maintenance of the agreed Sustainable Drainage Strategy.

## **10.9 AIR QUALITY AND CONTAMINATED LAND**

- 10.9.1 The London Plan, Policy 7.14 states that new development should: 'minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.
- 10.9.2 UDP saved policy UD3 sets out that:"The Council will require development proposals to demonstrate that:

a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

- 10.9.3 Saved Policy ENV1 and draft DM Policy DM32 require development proposals on potentially contaminated land to follow a risk management based protocol to ensure contamination is properly addressed and carry out investigations to remove or mitigate any risks to local receptors.
- 10.9.4 The applicant has submitted a Contaminated Land Assessment, The Council's Environmental Health Pollution Officer raises no objections subject to conditions.
- 10.9.5 The application site is adjacent to a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government's air quality objectives for nitrogen dioxide (NO<sub>2</sub>) and PM<sub>2.5</sub>. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMA) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new exposure adjacent this major arterial route into London, the proposed residential units are located away from the High Road, adjacent to the Park Lane / Worcester Avenue corner.
- 10.9.6 An air quality assessment (Air Quality Consultants, August 2015, ref: J2299) has been submitted along with the planning application to assess the air pollution impact of the proposed developments.
- 10.9.7 The main air polluting operations associated with the entire site include 1224 car parking spaces and associated traffic movements, 13.5MW gas powered boilers and 4.5 MW diesel generators; assessed during peak periods of stadium use. The diesel generators were originally proposed to be used as a primary source of power on match days and event days, for which the air quality assessment has determined would have an adverse impact on air quality in the local area.
- 10.9.8 The London Plan, Policy 7.14 states that new development should: 'minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMA) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least 'air quality neutral' and not lead to further deterioration of



existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs). Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

- 10.9.9 The initial proposal for the use of polluting diesel powered generators as a primary power source was unsatisfactory and discouraging; especially in the light of the work being carried out towards improving air quality. Following discussions with the applicant additional information has been submitted specifically with regard to air quality and the use of the diesel generators. The 'Regulation 22 – Further Environmental Information' submitted (November 2015) states ... *diesel generators will only be used for emergency backup generators on match day and will comply conform to the US Tier 3 (EU Stage IIIA). It is considered this will have a minimal impact on air quality on local receptors and remove the adverse impact to that of negligible'....*
- 10.9.10 Further information has been submitted via an AQ Note (Air Quality Consultants, November 2015). Section 3.1 of the AQ Note states '*THFC have committed to connecting to the UK Power Network (UKPN) for match day primary power provision, with no onsite power generation for match days'*. Further affirming that onsite power generation by diesel would only occur during emergency situations and that the generators will operate a maintenance schedule of a maximum of 1 hour per week (52 hours per year). The air quality impact will therefore be significantly reduced.
- 10.9.11 The aspiration is that in future the site will connect to a District Energy Network (DEN). However should this connection not be forthcoming then there will be a site-wide energy centre, operating gas fired CHP subject to feasibility and viability.
- 10.9.12 This is also confirmed by the Energy Strategy Clarification Note additional information (6th November 2015 Buro-Happold Engineering); '*2.3 The indicative phasing plan for the Development anticipates that the stadium, the Tottenham Experience and the community health centre will form the first phase of development and should be operational in 2018. It is understood that the North Tottenham DEN will not be delivered by 2018 and there is a requirement therefore that the first phase of the Development will need its own energy source. The application proposes that these uses will be served by an energy centre to serve all the buildings in this phase, which in effect will function as a site-wide energy centre for phase one. The energy centre will be located within the stadium building and will be supplied from high efficiency gas fired boilers.'*
- 10.9.13 And '*2.5 If the DEN is not operational in time for the delivery of these remaining elements of the Development, then in order to retain flexibility in terms of the timing, and sequence of these buildings coming forward, the application*

*proposals make provision for each to meet their own energy requirements (probable interim gas boiler solution) pending connection to the proposed DEN. The solution will be developed to allow for a site-wide network to be connected to the DEN once operational.'*

10.9.14 The proposal complies with policy subject to the imposition of conditions covering the following:

- Limiting the operation of the stadium until UK Power is capable of supplying the electricity needed for all events.
- Limiting the use of Diesel generators to emergency use only.
- Securing the use of high standard Diesel boilers and the use of ultra low sulphur fuel.
- Securing the specification of CHP boilers and flues
- Securing the submission of a Dust Management Plan

## **10.10 NOISE**

10.10.1 The National Planning Policy Framework states that Planning policies and decisions should aim to:

- a) avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development
- b) mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions:
- c) recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established: and
- d) identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

10.10.2 The London Plan 2011 (as amended) sets out planning policies, strategies, and guidance at national and regional level. Policy 7.15 states, development proposals should seek to manage noise by:

- a) avoiding significant adverse noise impacts on health and quality of life as a result of new development;
- b) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on development or adding unduly to the costs and administrative burdens of business;
- c) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity);

- d) separating new noise sensitive development from major noise sources (such as road, rail, air transport and some types of industrial development) through the use of distance, screening or internal layout — in preference to sole reliance on sound insulation;
- e) where it is not possible to achieve separation of noise sensitive development and noise sources, without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through the application of good acoustic design principles;
- f) having particular regard to the impact of aviation noise on noise sensitive development;
- g) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

10.10.3 UDP saved policy UD3 sets out that: “The Council will require development proposals to demonstrate that:

- a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;

10.10.4 The Draft DM DPD sets out the following:

#### Policy DM23 Environmental Protection - Noise and Vibration

- A. The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Potentially noisy developments may be refused if it cannot be suitably demonstrated that measures will be implemented to mitigate its impact.
- B. A noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise.

10.10.5 World Health Organisation Community Guidelines (WHO, 1999) provide 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 dh6BoLAuerq.l 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 night time impulsive noise levels of 60dB LAmax. For inside, indoor living areas, the WHO noise guideline value for ‘speech intelligibility and moderate annoyance, daytime and evening’ is 35 dh6BoLuAreq. For inside bedrooms, the noise guideline value for ‘sleep disturbance, night-time’ is 30 dh8BoLAuerq or 45dB LAmax.

- 10.10.6 The applicant submitted a noise assessment with its application. The Report identifies that noise emanating from the construction and operational use of the proposed development is likely to have an adverse aural impact on local residents and future residents and, may give rise to complaints of noise nuisance, prior to mitigation measures being implemented. The nearest existing residential properties to the site are located 20m away although the majority are more than 30m away.
- 10.10.7 The development will take 6-7 years to construct, with construction work proposed for 12 hour working days, 6 days a week, at noise levels which are assessed as significant.
- 10.10.8 No specific information regarding the proposed plant types and locations has been provided. Proposed fixed plant noise limits are derived from historic baseline noise data from 2008. Operational noise is likely to be audible at the façade of residential properties. Operating fixed plant at night time, at 45 dr8BLA eq is likely to cause sleep disturbance, with windows open.
- 10.10.9 The Report states the increased level of operational road traffic noise is assessed as insignificant, so no specific noise mitigation measures are necessary.
- 10.10.10 Football event noise is predicted to increase by 0.4dB, compared to the extant planning permission. This is likely to be an imperceptible change, so no additional noise mitigation measures are considered necessary.
- 10.10.11 For music events, which rely on the use of high powered amplification, Acoustic Conditions attached to a Premises Licence should reflect guidance provided in the Noise Council's Code of Practice on Environmental Noise Control at Concerts published by the UK Noise Council in 1995 (CoP). The CoP is designed to assist both LA's 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.
- 10.10.12 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.'
- 10.10.13 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'.
- 10.10.14 The Council had the noise assessment independently assessed by Sanctum consultants and its findings are set out in the following paragraphs:

### **Construction noise**

10.10.15 It confirms that the methodology used for the prediction of construction noise is in accordance with industry standards. The total construction period of six years is based on 12 hour working days, seven days a week. If construction was to be limited to the usual working hours 8 am to 6pm Monday to Friday and 8am to 1pm Saturdays the construction period would be increased by a year. The noise assessment does indicate some moderate negative/significant noise during some construction activities however for the most part the noise will be moderate negative/significant. Sanctum consider that the application should be conditioned to conventional hours. However, Officers consider that longer working hours are considered to be pragmatic in this instance given that this will shorten the time of construction overall. The submission of a Construction Environmental Management Plan is conditioned as this will set out that works outside the stadium shell will not be permitted after 6pm on weekdays and Saturdays after 1pm.

### **Road traffic noise**

10.10.16 As the increased level of operational road traffic noise is assessed as insignificant, no specific noise mitigation measures are considered necessary.

### **Operational plant noise**

10.10.17 Sanctum has confirmed that the appropriate methodology has been used for the prediction of operational noise from fixed mechanical plant and equipment. Sanctum set out that operational noise is likely to be audible at the facade of residential properties. The submission of a noise management plan including details of operational plant in each phase shall be submitted. This plan shall set out how noise has been minimised and the mitigation proposed.

### **Football and NFL match noise**

10.10.18 Sanctum confirm that noise from Football matches and NFL matches are likely to be similar to the current noise experienced and the impact is therefore acceptable. Details of the Public Address system are conditioned.

### **Music concert noise**

10.10.19 With regard to concerts, given that 6 music concerts are proposed, the proposal does not meet the COP 1995 guidelines. Sanctum suggest that the Council may wish to limit the noise to a 15 decibel increase. Officers are of the view that given the economic benefits of the concerts that this is not a reasonable approach particularly given that this is an existing stadium. The application is conditioned such that prior to the occupation of the stadium for music concerts, a noise control plan shall be submitted to the Council including details of the mitigation

measures included within Section 13.6 of the NDP Environmental Statement. The noise generated from music concerts must not exceed 75dB LAeq.

### **Impact on proposed residential development**

10.10.20 Sanctum has confirmed that the site's suitability for residential assessment has been assessed correctly. The assessment concludes that to reach WHO internal target values windows to the proposed residential towers should normally be kept closed and they will need to be fitted with mechanical ventilation. This matter will be dealt with at Reserved Matters stage.

### **10.11 ECOLOGY**

10.11.1 Policies 2.18 and 7.19 of the London plan contain positive obligations on development to safeguard ecological interests within development proposals, and to contribute to the development of a green grid. Policy 7.21 meanwhile seeks to retain where possible, existing trees and flora and promotes additional tree planting where appropriate.

10.11.2 Policy SP11: of the Haringey Strategic Polices DPD (2013) indicates that all new development should enhance and enrich Haringey's built environment and create places and buildings that are high quality, attractive, sustainable, safe and easy to use. To achieve this all development shall... Promote high quality landscaping on and off site, including improvements to existing streets and public spaces. Policy SP13 meanwhile seeks to protect all development shall protect and improve sites of biodiversity and nature conservation, including private gardens. The saved polices UD3, ENV7 and OS17 within the Haringey Unitary Development Plan reflect these policy provisions.

10.11.3 The Environmental Statement provides an update on the earlier investigations associated with the previous planning permission. The ecological value of the site has previously been investigated and consistent with a substantial level of change, including the implementation of the previous planning permission, the existing site is not the subject of any specific ecological designations. As part of the earlier assessment, the applicants undertook a Bat and Nesting Birds survey, and an extended phase 1 habitats assessment. These surveys were repeated through 2015 and the findings assessed in accordance with established databases (such as GiGL) and appropriate guidelines. The assessment considered the cumulative effects of the proposed development alongside other proposals.

10.11.4 There are two internationally important designations are present within 10km of the Project Site: Lee Valley Ramsar and Special Protection Area (SPA); and Epping Forest Special Area of Conservation (SAC). Two nationally important designations are present within 3km of the Project Site: Walthamstow Reservoirs

Site of Special Scientific Interest (SSSI); and Chingford Reservoirs SSSI. No locally important sites occur within 3km of the site boundary.

- 10.11.5 The desk-based information search provided by GiGL highlights the presence of two non-statutory Sites of Importance for Nature Conservation (SINCs) located within the data search area. These sites Tottenham Cemetery and Tottenham Hale to Northumberland Park Railsides are identified by the Greater London Authority on account of their flora and fauna and are graded on the basis of their importance to a particular defined geographic area in the following order of importance
- 10.11.6 Given the site conditions, the assessments found no distinctive vegetation or flora. Instead, the only value of the habitats on site was considered be to bats and birds. The assessment therefore focused on these two areas with two more detailed surveys. The bats survey found little evidence of activity on the site and the timing and frequency of recorded bat activity led the consultants used to conclude that bats were not roosting on the site or that they rely on the site for foraging.
- 10.11.7 In respect of nesting birds, the surveys undertaken highlight a pair of kestrels (amber-listed Bird of Conservation Concern (BoCC); London Species of Conservation Concern (LSCC)) nesting in the lower rear half of the north stand monitor screen. A pair of starlings (red-listed BoCC; UK & London BAP Priority Species; LSCC) was also recorded nesting above a doorway into the stadium, beneath a concrete ledge. The study concludes that whilst these species are of conservation concern, particularly in London, the site is not any more significant than any others in the locality such that the impact upon these recorded species will be limited.
- 10.11.8 The assessment also considers the scope of the developments tall structures to create an increased risk of bird strikes. This, the report indicates, takes place where large expanses of glass are proposed – particularly at night. The assessment concludes that the proposed buildings because of their design and form, do not exhibit such characteristics so as to pose a significant risk to birds.
- 10.11.9 Overall the ecological assessment identifies no significant risks to VEWR's as a result of the development. The proposed addition of green roofs to several buildings is, instead, considered to amount to a positive habitat gains in line with guidance within the NPPF, London Plan Policy 7.19, Haringey Policy SP13 and the UK, London and Haringey BAPs. Subject therefore to demolition works having regard to bird nesting times, and the contractor fulfilling the obligations contained in the appropriate legislation, the proposals are not considered to require any specific forms of mitigation. Officers accept this conclusion and accordingly consider that the proposals satisfy the requirements of polices.

## **10.12 ENVIRONMENTAL IMPACT ASSESSMENT**

- 10.12.1 The proposed development falls within the category of developments specified at Section 10(b), Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.
- 10.12.2 As the proposed development is likely to have significant effects on the environment, it is required to be subject to an Environmental Impact Assessment (EIA) before planning permission is granted. Regulation 3 of the EIA Regulations 2011 prohibits the grant of planning permission unless prior to doing so, the Council has taken the 'environmental information' into account. The environmental information comprises the applicant's original Environmental Statement (ES), any further information submitted following request under Regulation 22 of the EIA Regulations 2011, any other substantive information relating to the ES provided by the applicant and any representations received from consultation bodies or duly made by any person about the environmental effects of the development.
- 10.12.3 The applicant subsequently provided additionalr documentation and addendum to the ES, as clarifications which was consulted upon by letter, site and newspaper notice and the 21 day consultation period expired on 4 December 2014.

## **10.13 EQUALITIES**

- 10.13.1 In determining this planning application the Council is required to have regard to its obligations under equalities legislation including the 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 good relations between persons of different equalities groups.
- 10.13.2 The planning application will involve complete redevelopment of the stadium and the external refurbishment of listed and heritage buildings. The proposals engage primarily with protected characteristics around access and have been designed to contemporary Building Regulations and the Guidelines for Accessible Stadia. The replacement of the existing stadium building with a new fully accessible stadium is considered to have a positive benefit for visitors with physical impairment attending the sporting and other activities taking place on the site. Subject to conditions requiring the maintenance and operation of the lifts to the podium, the external spaces across the site are considered to provide equal access to all. The proposals are not considered to give rise to any differential impacts upon protected characteristics. The proposals are accordingly considered by officers to contribute to the elimination of barriers to access by those with physical impairment consistent with the promotion of the equalities



duties, Members must have regard to these obligations in taking a decision on this application.

## 10.14 CONCLUSION

- 10.14.1 It is necessary to start by reaching a conclusion on the heritage impacts of the proposed development before turning to the overall planning balance. Considerable weight must be given to the preservation of the settings of listed buildings and conservation areas in planning decisions as set out in both statute and the NPPF. Decision makers must consciously acknowledge any harm arising and then attach 'considerable weight' to it, and only then assess whether there are circumstances that outweigh the harm identified that allow permission to be granted. There is therefore a statutory presumption in favour of refusal if harm is present.
- 10.14.2 As is explained above there are a number of impacts on heritage assets. In terms of designated assets (i.e. listed building and conservation areas) the conclusion of the Conservation Officer, as set out above is that there is substantial harm to the settings of Warmington House and the setting of the conservation areas, as well as the demolition of the three locally listed buildings. The heritage officer's assessment is that in heritage terms that harm is not offset or made up by the heritage benefits of the proposal.
- 10.14.3 The test in para 133 of the NPPF is that where there is substantial harm to a designated asset this should only be allowed where it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 10.14.4 In terms of the demolition of the non-listed buildings, and the consequential impact on the setting of Warmington House, the justification put forward by the Applicant is that of crowd safety on match days. The officers have carefully scrutinised the report produced by the Applicant, and had it independently assessed. The officers' view is that its conclusions should be accepted. There is no sensible and effective way of ensuring crowd safety, and keeping the High Road open, other than the demolition of the non-listed buildings. The views of Historic England are noted, but with respect to them they are not crowd safety experts and they do not produce any supporting material for their view that the buildings can be retained and safety ensured. It is therefore officers' view that the test in para 133 is met and that the harm is necessary in order to achieve substantial public benefits with regard to the loss of the three locally listed buildings.

- 10.14.5 It is also the heritage officer's view that there is substantial harm to Warrington House, from the creation of the new terrace, including the Tottenham Experience. This is a fine judgment, and members will have to consider the degree of harm caused. However, even accepting that there is substantial harm in this particular respect, it is the officers' opinion that given the overall benefits of the terrace leading to the stadium, and the integrated and holistic design of this part of the scheme, the harm is necessary and the substantial public benefits outweigh the harm to heritage assets in respect of this part of the scheme.
- 10.14.6 The hotel element of the development is also considered to cause substantial harm to the Listed Building's setting and the Conservation Area as is the Tottenham Experience building. Given the substantial public benefit of the hotel, and its impact on economic regeneration of the area and levels of employment, this is considered necessary to deliver the substantial benefits of the scheme. The Tottenham Experience is considered an integral part of the stadium offer and as such is considered to be necessary to deliver the public benefits of the scheme. Therefore although the substantial harm to the Listed Building and its setting, and the setting of the Conservation Areas is acknowledged, this is outweighed by the major public benefits of the development. In order to achieve these benefits the harm to heritage assets is necessary.
- 10.14.7 The less than substantial harm caused by the residential towers and the development as a whole to surrounding designated and non-designated assets has also been given considerable weight however the substantial public benefits of the scheme are considered to outweigh this harm. In terms of the overall balance, this is a proposal that carries enormous benefits for North Tottenham in terms of jobs, economic activity and a range of new uses. An estimated 890 construction jobs, an estimated 820-1030 additional jobs (range depends if community use or office use) and an estimated at least £19.45 million contribution to the local economy per year are predicted.
- 10.14.8 The principle of redevelopment of the Stadium is strongly supported in policy, as are the uses closely associated to it, e.g. the Tottenham Experience. The Extreme Sports centre should become an important facility for the area and the community, particularly for young people. The housing development will create a large number of new dwellings in the area, and widen the range of housing mix. The hotel creates a large number of jobs, as well as being part of the overall transformational nature of the development for the area. The project also involves a large amount of public space which will be provided to a very high standard and will then be available to the community. As is envisaged in the Local Plan, AAP and the OAPF designation, the entire development will have a major regenerative effect in the area.
- 10.14.9 In summary the Development is of high quality, with the potential to be considered iconic, it delivers substantial public benefits which will regenerate the

area and act as a catalyst for wider regeneration, the heritage harm is necessary to deliver these public benefits and these benefits outweigh this harm. The development is considered to be in accordance with Development Plan policies. None of the other material considerations outweigh the policy support for the development.

- 10.14.10 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above.
- 10.14.11 All other relevant policies and considerations, including equalities, have been taken into account. Planning permission should be granted for the reasons set out above.

The details of the decision are set out in the RECOMMENDATION

#### **44 White Hart Lane**

### **11 MATERIAL CONSIDERATIONS (HGY/2015/3002)**

#### **11.1 Principle of development**

- 11.1.1 London Plan policy 5.17 Waste Capacity sets out in point H that if for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required that normally meets the maximum throughput that the site could have achieved.
- 11.1.2 The site is safeguarded as a waste site in the draft Site Allocations document and the site is also part of the wider site allocation for High Road West (NT5) in the draft Tottenham AAP.
- 11.1.3 The licensed waste capacity (tonnes/annum) for 44 White Hart Lane is 74,999 tonnes. The last use was as a metal recycling site (vehicle dismantler).
- 11.1.4 The site was until recently in use as a car breakers. Officers understand that Redcorn, the previous occupant, has implemented a phased relocation of all of its operations away from the application site to a site in Brantwood Road site since 2012. Although the proposal was advertised as a departure from the development plan, after consideration of the application and the material considerations the proposal is considered to be in accordance with the development plan.
- 11.1.5 The principle of an alternative use of the application site for non-waste use is in accordance with development plan policy because the previous waste-handling capacity of the application site has been transferred. In addition the use proposed is only temporary and, following the cessation of the temporary use of the site,

will be available for redevelopment in accordance with site allocation NT5 or to be returned to waste use subject to the outcome of the North London Waste Plan.

- 11.1.6 The height of the portacabins and the aggregate pile are conditioned and are not considered to impact on residential amenity.
- 11.1.7 As such the principle of the use of this waste site as a temporary construction compound is acceptable subject to the material considerations of traffic impact, air quality and noise being dealt with satisfactorily and these considerations are set out below.

## 11.2 Air quality

- 11.2.1 The London Plan, Policy 7.14 states that new development should: ‘minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans promote sustainable design and construction to reduce emissions from the demolition and construction of buildings; be at least ‘air quality neutral’ and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)). Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.
- 11.2.2 UDP saved policy UD3 sets out that:”The Council will require development proposals to demonstrate that:
  - a) there is no significant adverse impact on residential amenity or other surrounding uses in terms of loss of daylight or sunlight, privacy, overlooking, aspect and the avoidance of air, water, light and noise, pollution (including from the contamination of groundwater/water courses or from construction noise) and of fume and smell nuisance;
- 11.2.3 Policy DM23 Environmental Protection- Air Quality
  - C. All development should be designed to:
    - a. Improve or mitigate its impact on air quality in the Borough; and
    - b. Improve or mitigate its impact on air quality for the occupant of the building or users of the development.
  - D. Air quality assessments will be required for all major development and other development proposals, where appropriate.
  - E. Where adequate mitigation is not provided planning permission will be refused.

- 11.2.4 The site is adjacent to a main road of air pollution concern-White Hart Lane. The White Hart Lane / High Road junction area has exceedences of the Government's air quality objectives for nitrogen dioxide (NO<sub>2</sub>). The whole of the borough of Haringey is a designated Air Quality Management Area (AQMQ) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents.
- 11.2.5 An air quality assessment (Air Quality Consultants, September 2015, ref: J2357/1/D1) has been submitted along with the planning application to assess the air pollution impact of the 'construction compound'. The main air polluting operations include 41 HGV movements and dust from the delivery of aggregates. The air quality assessment has determined that the HGV movements will have an adverse impact on air quality in the immediate local area. The following assertions have been made:
- The compound is to be 'temporary' until 2018, and so assessment of air quality neutrality is not necessary.
  - There will be no requirement for demolition, earthworks or construction at the proposed development site.
  - All plant are understood to be 'mobile', with no permanent structural work required.
  - There will be no unpaved ground at the site.
  - The concrete batching facility will use only electric-powered plant, with no diesel or gas-fired fixed plant utilised in the batching process.
- 11.2.6 The Council's Environmental Health Officer does not object to the application subject to conditions covering the following:
- HGV's should be covered
  - Means of construction of internal roads
  - Measures to reduce dust
  - The issuing of an Environmental permit
  - An inventory of equipment and machinery
  - Scheme for disposal of foul and surface water and concrete waste water approved by the Local Planning Authority
  - Hours of operation limited to 7am-6pm weekdays and 8am and 1pm Saturday and no work on Sundays and Bank Holidays
  - No more than 20 lorries, including those associated with the concrete batching plant, shall enter the transfer site in any one day and no more than 20 lorries, including those associated with the concrete batching plant, shall leave the transfer site in any one day. In any one week, no more than 110 lorries shall leave the transfer site

11.2.7 All these conditions are included on the draft decision notice save for the condition limiting movements to 20 lorries and the hours of operation. Given the transport solution suggested below this condition is not felt to be necessary. Given the need to minimise the length of construction on the stadium site Planning Officers consider that it is reasonable for the hours of operation to be 7am until 7pm Monday to Saturday.

### 11.3 Transport impact

- 11.3.1 The proposal site is located off White Hart Lane some 160 meters from the junction with the High Road and Northumberland Park; the site was previously used as a car breakage and recycling facility which involved vehicles being transported to the site by recovery vehicles and car transporters. The vehicles were stripped crushed and the materials transferred from the site to be recycled. There were also a number of small car repair and tyre fitter garages located on the site, which generated some traffic. The applicant's transport consultant has not provided any trip generation or distribution information in relation to the previous use of the site, however, this site would have generated some traffic via White Hart Lane and in particular the junction of White Hart Lane with the junction of High Road N17 as part of its daily operation.
- 11.3.2 This section of White Hart Lane has eastbound queuing traffic during the AM, PM and Saturday inter peak. The traffic modelling completed in 2012 to support Phase 1 of the NDP development forecasted that post the construction of the supermarket, the junction will have a maximum degree of saturation of 84% during the AM peak hour, 88% during the PM peak hour and 89% during the Saturday inter peak with a maximum of 12 vehicles queuing after the green. It is to be noted that the forecasted degree of saturation is as a result of the predicted trips from the supermarket development and the proposed increase in background growth assumed as part of the forecasted development year 2015/16. The applicant's transport consultant has completed traffic surveys as part of the 2015 planning application. The results of the surveys concluded that the traffic volumes on the highways network in and around the site have decreased. The evidence provided demonstrates that there has been a reduction in the annual/ daily flow of traffic on the highways network since 2010; with a reduction in the annual average day flow next to the stadium of 18% between 2001 and 2011 (16,708 to 13,583).
- 11.3.3 The applicant has been granted planning permission for the construction of a 56,250 capacity stadium as part of planning permission HGY/2010/1000. As part of this application a Construction Management Plan was submitted, which was approved as part of the application. The Construction Management Plan included phased construction of all three phases of the development including the stadium. Due to various reasons the forecasted phasing of the development has been delayed; to date the construction activities have included the construction of

the northern development including associated highways works, and earth works for the stadium. The scale of the development has changed with the increase in the size of the stadium and southern development hence the applicant will be required to produce a revised construction management plan which will be secured as part of the new stadium and southern development application.

- 11.3.4 In relation to this application the applicant is proposing to provide a temporary construction compound which includes the manufacturing of concrete for the construction of the stadium only. During the excavation to construct the basement of the stadium large gravel deposits were found which is sufficient to implement the ground works and produce the concrete required to construct the stadium. This changes the dynamics of the supply chain for the delivery of concrete to construct the stadium; as instead of delivery of concrete via the A406, the concrete will be manufactured locally. This will reduce the length of the supply chain and reduce the number of vehicle miles that the concrete will have to travel to the site.
- 11.3.5 The approved Construction Management Plan as part of planning application HGY/2010/1000 includes forecasted trip movements in relation to the construction of the new stadium. The movements were based on 23 days per month and a working day of 8.5 hours, with vehicles evenly spread throughout the day. The ready mix concrete delivery was forecasted to take place between Dec-11 to Sept-12 with 8000 trips over an 8 month duration which equated to 1,000 trips per month. This would represent a maximum demand of 44 trips per day over this period. Based on an 8.5 hour day this would have equated to 5 trips per hour or 1 trip over 12 minutes.
- 11.3.6 The new concrete supply chain will include aggregate transferred to the 44 White Hart Lane site from the NDP site, the delivery of cement and sand to the site, water will be from the mains, the concrete trucks will be loaded with the concrete which will then be transferred to the NDP site. The applicant has forecasted that on an average day the proposed facility will have an average of 29 trips in each direction over an 8.5 hour period between the construction compound and the High Road. We have considered that although this is the average daily forecasted trip generation, we have considered a sensitivity test which considers the worst case scenario on the highways network. This is based on the maximum amount of concrete the site can actually use in the peak of the construction, which is some 400 cubic meters per day (8.5 hour day) with each concrete mixer assumed to be fully loaded with 8.5 cubic meters of concrete. This will produce 47 trips in each direction over the day, this equates to 3 more trips per day when compared to the previously approved construction management plan. Based on an 8.5 hour day this would equate to 5.5 (6) trips per hour in each direction 1 trip every 10 minutes in each direction. The difference between this proposal and the approved Construction Management Plan is that the trips will be distributed via White Hart Lane, with cement trucks

turning left out of the site then turning right onto the High Road and then left into the site. The reverse journey will see trucks turning right out of the site left into White Hart Lane and then right into 44 White Hart Lane. We have considered that the critical movement which may potentially impact on the operation of the junction is the right turning movements out of White Hart Lane into the High Road travelling east and on the returning journey travelling west the right turn out of the NDP site and the right turn into the 44 White Hart Lane construction compound.

11.3.7 We have reviewed the potential impact of these movements on the highways network as follows:

- (a) Travelling East: The right turn at the junction of White Hart Lane/ High Road, this junction is signalised with a right turn filter, which facilitates the right turning movements, this junction has recently been reconfigured as part of the implementation of the Northern Development, as part of the process TRANSYT modelling (Version 9) for the junction was approved by Transport for London (TfL), the results of the modelling concluded that the right turn had a high degree of saturation however the junction is operating within acceptable parameters. The traffic flows used in the traffic model were based on a fully operating superstore and the assumed background flows were higher than those surveyed above. As above the background flows have actually decreased over the last 10 years by 18%, in addition the traffic flow forecasted to be generated by the superstore have not materialised to date and are unlikely to in the next 2 years whilst this compound is in operation. In addition at a recently conducted site visit it was observed that the junction is operating within acceptable parameters with one exception, caused by the location of the W3 bus stop some 60 metres from the junction with White Hart Lane with the High Road which means that when eastbound buses stop cars cannot pass to utilise the green ahead and green right at the junction. This result in underutilised green time at the junction every 3-5 minutes and a slight increase in the queuing traffic. Our highways engineers have proposed relocating the bus stop approximately 25 metres to the west, this allows cars to pass parked buses and utilise the green ahead and green right at the junction. We have considered that with the above mitigation which improves the operation of the junction the proposed maximum increase of 1 additional HGV trip every 10 minutes can be accommodated without impacting on the operation of the junction. Aggregate, sand and cement will be stockpiled on site and the deliveries will be conditioned to take place outside the peak operational period of the highways network, AM peak, PM peak, and Saturday peak.
- (b) Travelling West: The right turn out of the NDP site will be controlled by construction traffic marshalls and will not significantly impact on the operation of the highways network as above; the increase in trips is only some 3 additional cement vehicles than was previously approved.



(c) Right turn into the site Construction Compound: We have considered that in order to be able to facilitate this movement, we will have to temporarily suspend the parking on the southern side of White Hart Lane directly fronting the site to create a right turn pocket for HGV vehicles this will ensure that:

- 1) HGVs turning right into the site don't block the flow of vehicles travelling west.
- 2) HGV's turning right into the site can wait in the turning pocket and not block the path/ flow of traffic travelling east towards the junction.

11.3.8 We have therefore considered that based on the worst case scenario, which doesn't include any discounting of the traffic based on the previous use, that subject to the following conditions, S106 and S.278 obligations the proposed development will not result in any significant impact on the transportation and highways network:

- 1) The applicant is required to enter into a S.278 agreement to implement a highways scheme as per Drawing (White Hart Lane.dwg) to relocate the bus stop, create a right turn pocket into the site and construction of vehicular crossover to facilitate two way HGV movements in and out of the site.
- 2) The applicant is required to submit details on the management of the site access by way of Traffic Marshalls, to ensure that the free flow of traffic on White Hart Lane is maintained, during the operation of the proposed facility.
- 3) The applicant is required to submit a construction travel plan for the proposed site, which details how staff will be encouraged to travel by sustainable modes of transport, and measures to encourage staff to travel by sustainable modes of transport.
- 4) Delivery of cements, sand and aggregate should be coordinated to fall outside the highways network AM and PM peak and the Saturday peak hour.

#### **11.4 Noise and impact on residential amenity**

11.4.1 In terms of the noise and disturbance impacts, saved UDP Policies UD3 and ENV6 require development proposals to demonstrate that there is no significant adverse impact on residential amenity including noise and pollution. In addition saved UDP Policy ENV7 necessitates developments to include mitigating measures against the emissions of pollutants and separate polluting activities from sensitive areas including homes. These policies align with London Plan Policy 7.15 and the NPPF which protects residential properties from the transmission of airborne pollutants arising from new developments.

11.4.2 The noise assessment sets out that overall the assessment, which is based on the worst case scenario, concludes that the impact of on-site noise to all but one receptor would be negligible. River Apartments Tower is the sole receptor that would experience an increase in noise levels against the accepted baseline, but

the increase is deemed to be insignificant. A number of objections have been received regarding noise from residents of River Apartments Tower.

- 11.4.3 Furthermore, it is a key consideration that the working hours of the former car breakers yard were not controlled and therefore the time limits on operation proposed through this planning application will ensure that any noise impacts are limited to those least sensitive parts of the day. This will ensure the new use of the site is more neighbour-friendly than the previous use. Although it was not possible to undertake a noise assessment of the previous car breaking activities, it is acknowledged that this led to significant noise impacts, which have now been removed. The noise impact is therefore acceptable.

## 11.5 Heritage

- 11.5.1 The southern end of the site is located within the Conservation Area and lies to the west of a Locally Listed Building.
- 11.5.2 NPPF chapter 12 'Conserving and enhancing the historic environment' and London Plan policy 7.8 'Heritage Assets and Archaeology' states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail. Similarly Local Plan Policy (2013) SP12 seeks to ensure the conservation of heritage assets, their setting, and the wider historic environment.
- 11.5.3 There is a legal requirement for the protection of the Conservation Area. The Legal Position on the impact on these heritage assets is as follows, and Section 72(1) of the Listed Buildings and Conservation Areas Act 1990 provide:

"In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." Among the provisions referred to in subsection (2) are "the planning Acts".

- 11.5.4 The Barnwell Manor Wind Farm Energy Limited v East Northamptonshire District Council case tells us that "Parliament in enacting section 66(1) did intend that the desirability of preserving listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given "considerable importance and weight" when the decision-maker carries out the balancing exercise."
- 11.5.5 The judgment in the case of the Queen (on the application of The Forge Field Society) v Sevenoaks District Council says that the duties in Sections 66 and 72 of the Listed Buildings Act do not allow a Local Planning Authority to treat the desirability of preserving listed buildings and the character and appearance of

conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell, it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area or a Historic Park, it must give that harm considerable importance and weight. This does not mean that an authority's assessment of likely harm to the setting of a listed building or to a conservation area is other than a matter for its own planning judgment. It does not mean that the weight the authority should give to harm which it considers would be limited or less than substantial must be the same as the weight it might give to harm which would be substantial. But it is to recognise, as the Court of Appeal emphasized in Barnwell, that a finding of harm to the setting of a listed building or to a conservation area gives rise to a strong presumption against planning permission being granted. The presumption is a statutory one, but it is not irrebuttable. It can be outweighed by material considerations powerful enough to do so. An authority can only properly strike the balance between harm to a heritage asset on the one hand and planning benefits on the other if it is conscious of the strong statutory presumption in favour of preservation and if it demonstrably applies that presumption to the proposal it is considering.

- 11.5.6 In short, there is a requirement that the impact of the proposal on the heritage assets be very carefully considered, that is to say that any harm or benefit needs to be assessed individually in order to assess and come to a conclusion on the overall heritage position. If the overall heritage assessment concludes that the proposal is harmful then that should be given "considerable importance and weight" in the final balancing exercise having regard to other material considerations which would need to carry greater weight in order to prevail.
- 11.5.7 The Council's Conservation Officer sets out that there is no impact on heritage assets due to the temporary nature of the use. Having regard to the former use, and the site's appearance from the Conservation Area, the proposals are not considered to materially impact upon the existing character and appearance of the locality such that the proposals would give rise to harm to the Conservation Area.

## 11.6 Conclusion

- Although the proposal was advertised as a departure from the development plan policy after consideration of the application and material considerations the proposal is considered to be in accordance with the development plan.
- The provision of a construction compound on this site will improve the efficiency of the construction phase on the main NDP site, allowing the stadium development to be completed more quickly.
- It will also allow for the concrete required to construct the stadium and associated structures to be prepared on a site within 150 metres of the NDP

site and reduce the significant quantities of aggregate recycled on the site from having to be transported to destinations elsewhere for disposal/re-use. It is estimated that approximately 72,900m<sup>3</sup> will be excavated in order to form the basement, of this it is estimated that approximately 62,400m<sup>3</sup> can be reused on site (i.e. 88%). This will reduce the HGV vehicle kilometres generated by the construction phase of the NDP site which will have spin-off benefits in terms of reducing the air quality impacts when considered in the round.

- While the proposal will have localised impact on the highway network, in White Hart Lane and at the Junction of White Hart Lane and the High Road, these impacts are not significant and can be sufficiently mitigated by the conditions and obligations proposed.
- Localised impact on Air Quality arising from additional traffic into and out of the site will be offset by overall reductions in Carbon Dioxide emissions.
- The submitted noise assessment confirms that, subject to appropriate controls on the proposed operations the increase in noise from the proposed use would be within acceptable limits having regard to the surrounding residential land uses.
- There is no harm caused to Heritage Assets.

## 12 . Planning Obligations

HGY/2015/3000

### STADIUM DEVELOPMENT

- Event Day Mitigation.
- Stadium Travel Plan [a highways, parking and travel plan for the use of the Completed Stadium for Major Events].
- Agree and implement an Event Day Coach Strategy (as part of the Stadium Travel Plan).
- Agree and implement an Event Day Cycling Strategy (as part of the Stadium Travel Plan).
- Local Area Management Plan [Plan to minimise adverse environmental impacts and nuisance to residents and businesses which are otherwise likely to be adversely affected by the use of the Stadium]. Includes stewarding at key junctions and transport interchanges and along main routes.
- Modal Split Target (“MST”) [77% of spectators using modes of transport other than private car].
- To achieve the MST promote and prioritise a proportion of tickets to local residents
- Event Day Monitoring Programme and Event Day Monitoring Review.
- Implementation of a strategy for providing an event day shuttle bus service between the stadium and Tottenham Hale Station and between the stadium and the Wood Green/Alexandra Park Stations
- Home Supporter Travel Initiative

- Retention of Visitors Measures

#### PODIUM AND PUBLIC ACCESS SPACE

- Year round public access to the Podium and other publically accessible areas (apart from for one day year).
- Maintenance of Podium and public realm.
- Cultural/Community Events [12 per year for 6 years].

#### BUSINESS AND SKILLS (COVERING ALL PHASES)

- Employment and Training Strategy to maximise opportunities for local people.
- Business Support Strategy to maximise opportunities for local businesses.

#### HEALTH CENTRE

- Health Centre Travel Plan

#### HERITAGE

- THFC to agree and implement a Heritage Management Plan for the heritage assets in its possession including the external refurbishment of buildings within their ownership in the Northern Terrace.

#### HIGHWAYS

- Completion of match day CPZ in Haringey and Enfield
- Completion of Highways works including:
  - Bus priority measures on Northumberland Park, Willoughby Road, Shelbourne Road and Lansdowne Road,
  - Improvements to Chestnut Road
  - New pelican crossings on the High Road.
  - New crossing point at Park Lane Junction with Shelbourne Road.
  - Upgrading Worcester Avenue.
- Implementation of a strategy, to be agreed with the Council, for improvements to the walking route between the Stadium and White Hart Lane Station.
- Implementation of a signage strategy, to be agreed with the Council, for the proposed walking route between the Stadium and main transport interchanges.
- Additional Worcester Avenue traffic suspension.

#### ENERGY

- Connection of all parts of the scheme to District Energy Network (DEN) if feasible and viable.
- Agree and implement a strategy for providing a single site wide energy centre in the event of the DEN not coming forward.

#### HOTEL DEVELOPMENT

- Hotel Travel Plan.

#### RESIDENTIAL, FLEXIBLE COMMUNITY/COMMERCIAL AND EXTREME SPORTS

- Review Mechanism for off-site affordable housing contribution.
- Residential Travel Plan.
- Community/Commercial Travel Plan.

- Extreme Sports Travel Plan.
- Residents Parking Permit free development.
- Car Club.

## MISCELLANEOUS

- Educational visits  
Considerate Constructors Scheme

## **13. CIL**

### **13.1 HGY/2015/3000**

- 13.1.1 This is a 'hybrid' planning application with part of the scheme (Stadium, Tottenham Experience and Hotel) submitted in full and the remainder (Residential, Extreme Sports, Flexible Community/Health Uses and Community Health Building) submitted in outline. At this stage CIL contributions are calculated for those parts of the scheme applied for in full. The CIL contributions for those parts of the scheme submitted in outline will be calculated at the submission of the first reserved matters application for that part.
- 13.1.2 Based on the information given on the plans, the Mayor's CIL charge for those parts of the scheme submitted in full will be £3,728,515.00 (106,529 sqm of net additional floorspace x £35.00). As the residential element of the proposal is in outline there is no CIL liability at this stage. As an indication the residential floorspace in the indicative scheme would generate a CIL contribution of approximately an additional £3 million at reserved matters stage.
- 13.1.3 The Mayoral CIL contribution will be collected by Haringey after the scheme is implemented and could be subject to surcharges for failure to assume liability, for failure to submit a commencement notice and/or for late payment, and subject to indexation in line with the construction costs index.

### **13.2 HGY/2015/3002**

- 13.2.1 There is no increase in floorspace and as such is not liable for CIL.

## **14. RECOMMENDATIONS**

### HGY/2015/3000

GRANT PERMISSION subject to conditions and subject to sec. 106 Legal Agreement

### HGY/2015/3001

GRANT PERMISSION subject to conditions

HGY/2015/3002

GRANT PERMISSION subject to conditions and section 278 Agreement

### **List of Appendices**

1. (a) Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3000 and Listed Building Application HGY/2015/3001

(b) Approved Application Drawings and Technical Documents for Full Planning Application HGY/2015/3002

2. Site Plans and Scheme Images
3. Map North Tottenham High Road Conservation Area
4. Quality Review Panel reports
5. Summary of comments received
6. LBH Transportation comments
7. LBH Conservation Officer comments
8. Historic England and LAC responses
9. GLA Stage 1 Report
10. Transport for London response
11. Independent Review of Crowd Safety
12. Independent Acoustic Review
13. LBH Lead Officer Pollution comments
14. LBH Head of Carbon Management comments
15. Thames water comments
16. Environment Agency comments
17. Natural England comments
18. Tottenham CAAC comments
19. Victorian Society comments
20. Our Tottenham Comments
21. Tottenham Conservation Comments
22. Tottenham Business Group Comments
23. Save Britain's Heritage Comments
24. Conditions