

GREATER **LONDON** AUTHORITY
Development, Enterprise and Environment

Neil McClellan
Haringey Council
Regeneration, Planning & Development Directorate
Planning Service
6th Floor, River Park House
225 High Road, London
N22 8HQ

Our ref: D&P/2292g/01/MJ
Your ref: HGY/2015/3000
Date: 28 October 2015



Dear Mr McClellan

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008 Northumberland Development Project (Tottenham Hotspur Stadium)

I refer to the copy of the above planning application, which was received from you on 21 September 2015. On 27 October 2015, the Mayor considered a report on this proposal, reference D&P/2292g/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan, for the reasons set out in paragraph 199 of the above-mentioned report; however the possible remedies that could address these deficiencies are set out in that paragraph. Notwithstanding paragraphs 79 to 105 of the report, the Mayor expressed the view that the loss of non-designated heritage assets, including the former 'Dispensary' (746 High Road), the 'Red House' (748 High Road) and the former 'White Hart Public House' (750 High Road) is not justified, and furthermore, that these buildings should be retained in the scheme. Consequently, the applicant should review the proposals in order to incorporate these buildings into the scheme.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application, or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose

and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is James Forrest, e-mail jamesforrest@tfl.gov.uk, telephone 020 3054 7090.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Colin Wilson', with a stylized, cursive script.

Colin Wilson

Senior Manager – Development & Projects

cc Joanna McCartney, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Alex Williams, TfL
David Roach, DP9, 100 Pall Mall, London SW1Y 5NQ

27 October 2015

Northumberland Development Project (Tottenham Hotspur Stadium)

in the London Borough of Haringey

planning application no. HGY/2015/3000

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

A hybrid application comprising demolition and comprehensive phased redevelopment:

Full planning permission is sought for the new Stadium (Class D2), (59 metres AOD); a hotel (Class C1) of 22 storeys (100 metres AOD); Tottenham Experience building (sui generis) of 3 storeys; and surrounding public realm, including a podium square to the south of the Stadium and a new Plaza at the south-west corner of the site.

Outline planning permission is sought for an Extreme Sports centre (Class D2) (62 metres AOD); community space (Class D1) and/or offices (Class B1); housing (Class C3); and 3 storey health centre (Class D1). The residential buildings include two 19 storey buildings (69 metres AOD), a 27 storey building (105 metres AOD) and a 35 storey building (131 metres AOD). Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and/or office building. Details of "appearance" and "scale" are reserved in relation to the Extreme Sports centre building. Details of "appearance" are reserved in relation to the health centre building.

The proposal includes the demolition of three locally listed buildings and includes works to a Grade II listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001).

The applicant

The applicant is **Tottenham Hotspur Property Company Ltd**; the architects are **Populous, Allies and Morrison**, and **Donald Insall and Associates**; and the agent is **DP9**.

Strategic issues

The proposed development is strongly supported in principle; however issues with respect to **housing; affordable housing; historic environment and loss of heritage assets; urban design and tall buildings; inclusive design; transport; climate change; and air quality** should be addressed before the application is referred back to the Mayor at his decision making stage. The phasing of the full and outline elements should also be clarified. Policies on **regeneration and economic development; mix of uses and town centre uses; sports and recreation; and visitor infrastructure** are also relevant to this application.

Recommendation

That Haringey Council be advised that the application does not yet comply with the London Plan, for the reasons set out in paragraph 199 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1 On 21 September 2015, the Mayor of London received documents from Haringey Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor has until 30 October 2015 to provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under Categories 1A, 1B(c) of the Schedule to the Order 2008:

- 1A *"Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
- 1B *"Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - (c) outside Central London and with a total floorspace of more than 15,000 square metres."*
- 1C *"Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

3 Once Haringey Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or allow the Council to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 has been taken into account in the consideration of this case.

5 The Mayor of London's statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The site occupies an area of 8.97 hectares. The southern site boundary runs along the southern pavement of Park Lane, from Park Lane's junction with Vicarage Road in the east, to Park Lane's junction with the High Road in the west, at which point it turns south following the building line of 732 High Road until the public conveniences on the east side of the High Road, where it crosses to the western side of the High Road.

7 The western site boundary runs along the rear edge of the western pavement of the High Road, from the point at which the boundary crosses the High Road in the south, to White Hart Lane in the north. The boundary then crosses the High Road and continues up the front edge of the eastern pavement of the High Road to the junction with Northumberland Park.

8 The northern boundary is largely formed by the boundary with Lilywhite House (comprising the Sainsbury's foodstore fronting Northumberland Park; Tottenham University College; and Tottenham Hotspur Football Club's administrative offices), which runs from Worcester Avenue in the east to the edge of the Sainsburys service car park to the rear of 792 High Road (Dial House) in the west. The boundary then extends northwards up to Northumberland Park, including 794 - 814 High Road, but excluding 790-792 High Road.

9 The eastern boundary runs along the eastern pavement of Worcester Avenue from Park Lane in the south to Northumberland Park in the north. The site boundary extends across the road to the pavement on the western side of the road but does not include 1-41 Worcester Avenue.

10 The majority of the site is currently occupied by the existing White Hart Lane Stadium, which is located to the south east of the site, bounded by Worcester Avenue to the east and Park Lane to the South. The current Stadium has a spectator capacity of 36,237, with four stands built in the 1980s and 1990s, of up to 24 metres in height (equivalent to 7-8 residential storeys).

11 To the west of the Stadium, fronting on to the High Road, are a series of buildings, including the single storey Football Club's merchandise store, located immediately west of the Stadium on the junction of High Road and Park Lane, which has a temporary planning permission. North of this, 744 High Road 'Warmington House' is a Grade II listed three storey building (circa 1828) of brick and stucco, now vacant and boarded up. To the north of this is 746 High Road, the 'Dispensary', a locally listed three storey building (circa 1910) of stone and red brick, also vacant and boarded up. To the north, on the corner with Bill Nicholson Way, is 748 High Road, the 'Red House', a locally listed three storey Victorian building of red brick. On the opposite corner of Bill Nicholson Way is 750 High Road, 'Valentino's', a locally listed three storey Victorian former public house (The White Hart) of brick and render, currently vacant.

12 The site is hoarded along the High Road to the north of this, up to Lilywhite House and Dial House. The buildings previously on this site were largely demolished under a previous planning permission for the development of a new Stadium (LPA ref: HGY/2010/1000), including the Grade II listed 774 High Road (Fletcher House) and locally listed 752-766 High Road. The land behind this hoarding included the Archway Metals buildings, which have now been demolished, with the rest of this part of the site currently subject to site clearance and preparatory ground works associated with the previous planning permission.

13 Dial House (Grade II* listed), located at 790 High Road, and the adjacent property at 792 High Road (Grade II) do not form part of the application site. To the north of this, the 'Northern Terrace' includes 794, 796, 798 - 802 High Road, a continuous brick terrace of three storeys dating from the mid-eighteenth century. The buildings are set back from the High Road, each having a front forecourt and boundary treatment. They are all statutorily Grade II listed apart from 796, 'Percy House', which along with its forecourt, walls and railings, is Grade II* listed. Percy House has recently been the subject of an approved application by the Tottenham Hotspur Foundation (a charity founded and associated with Tottenham Hotspur Football Club), which will refurbish the building as a community facility.

14 To the north, 804 and 806 High Road is a three storey brick terrace with shops at ground floor level, not listed or locally listed. To the north, 808 and 810 High Road are a pair of Grade II* listed three storey red brick eighteenth century buildings set back behind railings. To the north, 814 High Road is a locally listed, mid-nineteenth century, two storey red brick building, located on the southern corner of the High Road and Northumberland Park.

15 The wider area is primarily residential, with a wide range of housing types and dates, including Victorian terraces and larger scale post-war blocks. Commercial and community uses line the High Road. Immediately to the east of Worcester Avenue is Northumberland Park Community Secondary School, and St. 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. The site is located in Northumberland Park Ward, which has significant levels of deprivation and higher rates of unemployment than in the rest of Haringey.

16 The administrative boundary with the London Borough of Enfield lies approximately 500 metres north of the site.

17 The site is within an area of regeneration, as identified by the London Plan and Haringey Council. It is within the Upper Lee Valley Opportunity Area and the Tottenham Housing Zone.

18 The west section of the site, fronting onto the High Road, forms part of the North Tottenham Conservation Area.

19 The site is bounded by the A1010 High Road to the west, which is part of the strategic road network (SRN); however the nearest part of the Transport for London Road Network (TLRN) is the A10 at Bruce Grove.

20 There are ten bus routes serving the area, with bus stops on the High Road and Northumberland Park. White Hart Lane station is approximately 200 metres to the west and provides access to London Overground services to Liverpool Street, Enfield Town and Chestnut stations. Northumberland Park station is approximately 600 metres to the east and provides access to rail services on the Tottenham Hale branch of the Lea Valley line. The nearest Underground station is Tottenham Hale on the Victoria Line, approximately 2.2 kilometres to the south-east. Although Seven Sisters is actually further away, at 2.6 kilometres to the south, it is however perceived as being more accessible to this area given the short bus interchange on Tottenham High Road and the direct walking route. The overall site records a public transport accessibility level of (PTAL) of 4 on a scale of 1 to 6, where 6 is classed as excellent.

21 Cycling Superhighway 1 (CS1), currently under construction, will link this area to the City. It will avoid major roads and will provide a new alternative route with improved cycling facilities.

Details of the proposal

22 The Development comprises a hybrid planning application for the demolition of most structures on the site and comprehensive redevelopment. The floorspace is summarised as follows:

Land Use	Use Class	Area GIA (sqm)	Units
Leisure (including stadium)	D2	122,045 (max)	n/a
Residential	C3	49,000	585 (max)
Sui Generis / Tottenham Experience	Sui Generis	4,311	n/a
Business	B1	4,000 (max)	n/a
Community and Culture	D1	6,000 (max)	n/a
Hotel / Serviced Apartments	C1	18,820	229



Illustrative image (full and outline elements)

Full Planning Permission:

The Stadium (D2 Use)

23 A 61,000 capacity Stadium of up to 59 metres in height, including a football pitch able to retract beneath the southern stand, revealing a hard surface space to cater for American Football matches for the National Football League (NFL), concerts and a range of other events. It is intended that the Stadium will host up to 10 (non-Tottenham Football Club) sports events and 6 non-sports events per annum. The Stadium is wrapped with a sculptured mesh wrap, apart from the south stand which has a glass facade. The south stand includes a five-storey atrium space with catering outlets. A 'sky walk' attraction will allow visitors to climb the exterior of the south stand allowing views across London. Conference and banqueting facilities are also provided.

24 A Stadium 'front door' is included on the High Road, with a projecting escalator box above. Adjacent to this to the north is a 'media café', also fronting on to the High Road. An entrance to the east stand is provided onto Worcester Avenue.

25 A high level bridge is proposed to link the existing Club offices on level 4 of Lilywhite House to level 5 of the Stadium.

26 Match day car parking with 319 spaces is located beneath the stands and in the basement, accessed from the High Road and Worcester Avenue. A new covered service area is also included.

'Tottenham Experience' (Sui Generis)

27 This multi-use facility, located at the south-west corner of the site facing onto the High Road, immediately to the south of the Stadium, will provide a new visitors' centre for the Stadium. The Grade II listed Warmington House will be incorporated. Steps to the rear of the building lead to the new southern terrace, with the ground floor of the building extending

underneath the terrace. Areas of the roof of the building are proposed to be publically accessible. The uses within the building comprise the following:

- Museum and learning facilities, including a Museum of Tottenham Heritage, and a Club Museum. It will also allow for the incorporation of key elements of the three buildings that are proposed to be demolished (746, 748 and 750 High Road).
- Club shopping space.
- A cinema space, which will form part of the Club Museum and Stadium tour, also providing a venue for private screenings and local community events.
- Ticketing area for Stadium event tickets, Stadium tour tickets, and a changing area for the 'sky walk'.
- A cafe with rooftop seating.
- A rooftop events space.

Hotel and serviced apartments (C1 Use)

28 A 22 storey (89 metre) glass-clad 'blade' shaped hotel is proposed in the south-west corner of the site at the junction of the High Road and Park Lane, on a broadly north-south axis to the east of the 'Tottenham Experience', and integrated with the Stadium podium on its north and east elevations. The hotel will have 180 bedrooms on floors 3 to 14; 49 serviced apartments on floors 15 to 21; restaurants, bars, workspace, gym, swimming pool and corporate facilities on the lower floors; a foyer restaurant and roof-top bar on the top floor; and a 76 space basement car park accessed from an entrance in the 'Tottenham Experience' building from the High Road. A coach and car/taxi drop-off point is proposed to the south of the hotel entrance on Park Lane.

The Public Realm

29 The public realm stretches around all sides of the site, integrating the Stadium with the other buildings in the southern development and the community health centre. It consists of new streetscapes running along the perimeter of the site on the High Road, Park Lane and Worcester Avenue, as well as areas of podium to the north and south of the Stadium. The north and south podiums are linked to the surrounding street by wide stairways and external lifts.

30 The High Road footpaths are widened and planted with Plane trees; Worcester Avenue is proposed to become a shared surface with tree planting; and widened footpaths and tree planting are proposed along Park Lane.

31 The 'South Podium Square' (the size of Trafalgar Square) is a multi-use space incorporating a new public square, which is intended to host a variety of sports and community uses. The space includes a series of 'islands' around ventilation shafts serving the car parking areas, which provide seating, trees and planting; a 'jumping jet' water fountain; a multi-use games area (MUGA); and cafe seating areas. It is envisaged that the Tottenham Hotspur Foundation will operate a series of programmes and initiatives that will use the podium space on non-event days.

32 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.

33 The development also includes a number of alterations to existing highways, including reconfiguring the junction between the High Road and Park Lane, the junction between Park Lane and Worcester Avenue, the stopping up of Bill Nicolson Way and Paxton Road, and the realignment and resurfacing of Worcester Avenue.

Outline Planning Permission:

'Extreme Sports Centre' (D2 Use)

34 Situated on the eastern side of the proposed hotel and forming the eastern edge of the proposed Stadium entrance plaza on the south-west corner of the site. The building (approximately 55 metres in height) will include a range of sporting activities, with indoor and outdoor climbing walls, and the opportunity to incorporate a scuba diving tank. At the lower levels of the building, high performance activities are proposed, such as speed, agility and reaction tests, and it is intended that the centre can be used by local schools and training centres.

35 The application seeks outline consent, with full details submitted for access to the building, the layout and the surrounding landscaping. Detailed matters relating to scale and appearance are reserved.

Southern Residential (C3 Use) and Flexible Community/Leisure/Office (Use Class D1/D2/B1)

36 The Southern Residential component is proposed in the south-east corner of the site, fronting both Park Lane to the south and Worcester Avenue to the east, providing up to 585 residential units in four buildings above a three storey podium building. The buildings include two 19 (above ground) storey buildings, a 27 (above ground) storey and a 35 (above ground) storey building. Five three bedroom townhouses are also proposed fronting onto Park Lane.

37 The residential component will be served by 270 car parking spaces within the podium structure, located in two lower basement levels, ground floor and first floor level, accessed from Worcester Avenue.

38 Within the plinth beneath the residential blocks, up to 3,500 sq.m. (GIA) of flexible floorspace is proposed at ground, first and second floor level. In the event that a district wide energy network has not been delivered by the time this element of the scheme comes forward, this area could also accommodate a site wide energy centre.

39 The application seeks outline planning permission for this element, with full details submitted for layout, scale and access, with matters relating to appearance and landscape reserved for approval at a later date. A Residential Design Code has been submitted covering the internal layout and the appearance of the residential buildings, including the 'plinth' (two basement and three above ground levels beneath the four residential towers).

Community Health building (Use D1)

40 A new two storey (maximum 21 metres) community health building is proposed in the north-east of the site, fronting onto Worcester Avenue, with health uses at first and second floor levels. The ground floor will provide a goods yard and main servicing entrance to the Stadium. The stairs and lift to the northern podium wrap around the southern end of the building.

41 The application seeks outline planning permission for this element, with full details submitted for layout, scale, access and landscape, with matters relating to appearance reserved for approval at a later date.

Case history

42 The application site is the subject of an extensive planning history. The most relevant planning history is largely focused on four principal planning permissions:

- Part full and part outline permission was granted in September 2011 (LPA ref: HGY/2010/1000), for the redevelopment of the site including a new Stadium (capacity 56,250) and associated development to the north (mixed use building with car parking at ground floor level, retail foodstore, office and hospitality Stadium-related development) and the south (up to 200 residential units in a building of up to ten storeys, up to 1,000 sq.m. of office floorspace, and a hotel of up to 150 bedrooms). Demolitions have taken place associated with related Conservation Area and Listed Building Consents.
- Full permission was granted in March 2012 (LPA ref: HGY/2011/3250) for the northern part of the site comprising foodstore, education, Stadium-related and showroom/brand centre uses. This permission has been fully implemented.
- Outline permission was granted in March 2012 (LPA ref: HGY/2011/3251) for the southern part of the site for 285 residential units in four blocks, and 15,000 sq.m. of space for college, health club and office uses.
- A minor material amendment was granted in July 2015 (LPA ref: HGY/2015/0964), to accommodate a new basement, changed ground floor layouts, and the removal of certain conditions.

43 Pre-application discussions have been held on the current proposals with the Council; the GLA; and TfL since mid-2014.

Strategic planning issues and relevant policies and guidance

44 The relevant issues and corresponding policies are as follows:

- | | |
|------------------------|--|
| • World city role | <i>London Plan; London Planning Statement</i> |
| • Economic development | <i>London Plan; the Mayor's Economic Development Strategy; Employment Action Plan</i> |
| • Regeneration | <i>London Plan; the Mayor's Economic Development Strategy</i> |
| • Employment | <i>London Plan</i> |
| • Tourism/leisure | <i>London Plan</i> |
| • Culture | <i>London Plan; Mayor's Cultural Strategy</i> |
| • Health | <i>London Plan; Social Infrastructure SPG; Health Inequalities Strategy</i> |
| • Mix of uses | <i>London Plan</i> |
| • Town centre uses | <i>London Plan; Town Centres SPG</i> |
| • Housing | <i>London Plan; Housing SPG; Housing Strategy; Shaping Neighbourhoods: Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG</i> |
| • Affordable housing | <i>London Plan; Housing SPG; Housing Strategy</i> |
| • Density | <i>London Plan; Housing SPG</i> |
| • Historic Environment | <i>London Plan</i> |
| • Urban design | <i>London Plan; Shaping Neighbourhoods: Character and Context SPG; Housing SPG; Shaping Neighbourhoods: Play and Informal Recreation SPG</i> |
| • Tall buildings | <i>London Plan</i> |
| • Inclusive design | <i>London Plan; Accessible London: achieving an inclusive environment SPG</i> |
| • Transport | <i>London Plan; the Mayor's Transport Strategy</i> |
| • Parking | <i>London Plan; the Mayor's Transport Strategy</i> |

- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*
- Climate change *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy*
- Air quality *London Plan; the Mayor's Air Quality Strategy*

45 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is Haringey's Local Plan (2013), the Saved Policies within the Unitary Development Plan (2013), and the 2015 London Plan (Consolidated with Alterations since 2011).

46 The following are also relevant material considerations:

- The National Planning Policy Framework and accompanying Planning Practice Guidance.
- The 2015 draft Minor Alterations to the London Plan.
- The Upper Lee Valley Opportunity Area Planning Framework (ULV OAPF) (July 2013).
- The Tottenham Area Action Plan (Preferred Option Consultation) (February 2015).
- Tottenham High Road West Masterplan Framework (September 2014)
- Northumberland Park Strategic Framework Report (February 2015)

Principle of development

Regeneration and economic development

48 In policy terms, the development plan documents affirm Tottenham High Road as a strategic area for regeneration and support the allocation of the site for a Stadium-led mixed-use development, including some housing. The principle of redevelopment of the existing Stadium and the wider site has therefore been established by development plan policy and through the extant permission.

49 A development of this scale would accord with London Plan Policy 2.1 'London in its Global, European and UK Context', which aims to support London's unique strengths as a diverse world city, including culture and tourism. It would also contribute to the objectives for Outer London as set out in London Plan Policy 2.7 'Outer London: Economy' and Policy 2.16 'Strategic Outer London Development Centres', which specifically identifies the Upper Lee Valley for leisure, tourism, arts, culture and sports functions of greater than sub-regional importance.

50 The site lies within the boundary of the Upper Lee Valley Opportunity Area as identified in London Plan Policy 2.13 and Table A1.1, which states that the Opportunity Area is capable of accommodating at least 20,100 homes up to 2031 and with an indicative employment capacity of 15,000. Haringey Council's Local Plan identifies the site as part of the wider regeneration of Northumberland Park and its Tottenham Area Action Plan (Preferred Option Consultation) (February 2015) identifies the site for redevelopment of the existing Stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site.

51 The entire site falls within a Regeneration Area (within the 20% most deprived areas), as identified by the London Plan, and the Northumberland Park Growth Area, as identified in Haringey's Local Plan. The Stadium redevelopment will assist the regeneration of this part of Haringey in accordance with London Plan Policy 2.14 'Areas for Regeneration'. The applicant estimates that the proposals will generate the following economic benefits:

- Up to an additional 700 full-time equivalent (FTE) jobs on-site, compared to the previously consented scheme which was estimated to have generated 370 FTE jobs;
- Up to 330 part-time jobs on event-days, an increase on the consented scheme of 30 part-time jobs;
- Up to £7.9m of household spending from the residential element;
- The introduction of at least two NFL American Football matches per year, with the potential to generate an additional £2.4m of spend each year within the Tottenham area;
- The music events within the Stadium, of which there would be up to 6 per year, has the potential to generate up to £12m of additional spend in the area;
- The hotel and serviced apartments have the potential to generate up to £560,000 of additional spend in the area; and
- The Extreme Sports Centre has the potential to generate up to £2.4m of additional spend in the area.

52 The wider regenerative potential of placing an iconic new Stadium in this part of London, together with a high quality housing development, hotel, visitor attractions, and new high quality public realm are also recognised. The proposals are supported in line with London Plan policies on regeneration and economic development.

Mix of uses and Town Centre uses

53 London Plan Policy 2.15 'Town Centres' promotes town centres as the main focus for commercial development and intensification, including residential development. Policy 4.7 'Retail and Town Centre Development' requires that retail, commercial, culture and leisure development should be focused on sites within town centres, or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport (the sequential test). The NPPF defines edge of centre as within 300 metres of a town centre boundary. Furthermore, Policy 4.7 requires proposals for new, or extensions to existing, edge or out of centre development to be subject to an assessment of impact.

54 The site is not within a town centre and the stretch of the High Road immediately to the west of the site, of which part lies inside the site boundary, has no formal designation as a town centre. 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 an almost continuous length of ground floor retail space, including town centre uses such as Council Offices, Tottenham Sports Centre and a Public Library to the south of the site.

55 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.

56 To the extent that the sequential test applies, National Planning Practice Guidance and recent case law make it clear that in considering the availability of alternative sites as part of the sequential test, the relevant consideration is 'the proposal', which in this case is the development as a whole, while it is not appropriate to seek to disaggregate individual elements of the proposal to consider whether these could be accommodated elsewhere. Clearly, there is

no site within the vicinity that would allow a development of this scale and it is recognised that the football club has close associations with the site that should be retained.

57 With regard to the matter of impact, it is recognised that the scale and type of uses as part of the full application (Tottenham Experience and hotel) are strongly related to the Stadium, as is the Extreme Sports centre in the outline application, and are unlikely to have an impact on nearby own centres. Concerning the 4,000 sq.m. of flexible space in the outline application, the Council may require an assessment of impact as part of the subsequent reserved matters application, depending on the proposed use.

58 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.

59 The proposals are acceptable in relation to London Plan policies on mix of uses and town centre uses.

Sports and recreation

60 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. As discussed above, clearly, there is no site within the vicinity that would allow a development of this scale and it is recognised that the football club has close associations with the site that should be retained.

61 The application states that the Club is committed to hosting a series of community sporting events, activities and programmes each year within the Stadium for the benefit of local Haringey residents and 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 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.

Visitor infrastructure

62 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.

Social infrastructure

63 The outline element of the application includes a new community health building, and up to 4,000 sq.m. of community uses. London Plan Policies 3.16 'Protection and Enhancement of Social Infrastructure' and 3.17 'Health and Social Care Facilities' supports 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.

64 The Tottenham area suffers from severe health inequalities and the Local Plan recognises that there is an increased requirement for health services in the north east of the borough, which includes Tottenham. The application also states that the football club will also host community sporting events, activities and programmes each year within the Stadium for the benefit of local Haringey residents. The proposals to provide health and community uses are supported in line with London Plan policies.

Residential

65 The outline part of the application proposes 585 new residential units. London Plan Policy 3.3 'Increasing Housing Supply' recognises the pressing need for new homes in London and Table 3.1 gives an annual monitoring target of 1,502 new homes per year in Haringey between 2015 and 2025. The site falls within the Tottenham Housing Zone, which has a target for almost 2,000 new homes. Policy 3.7 'Large Residential Developments' encourages such developments, including complementary non-residential uses, in areas of high public transport accessibility. The proposals for residential use are supported in line with London Plan policy.

Summary

66 The redevelopment of the site as a Stadium-led mixed use development is strongly supported in principle, given the reasons set out above.

67 The application materials indicate that the Stadium, Tottenham Experience building, and community health building will be constructed initially, with the hotel, Extreme Sports building and residential buildings completed in future phases. The applicant should clarify the phasing in relation to the outline application, which includes the community health building; and the full application which includes the hotel.

Housing

68 The residential part of the application is in outline form; however the indicative residential mix is as follows:

	Units	%
Studio	20	3%
One bed	268	46%
Two bed	268	46%
Three bed	29	5%
Total	585	100%

Affordable housing

69 London Plan Policy 3.9 'Mixed and Balanced Communities' seeks to promote mixed and balanced communities by tenure and household income. Policy 3.12 'Negotiating Affordable Housing' seeks to secure the maximum reasonable amount of affordable housing. Haringey Council's own affordable housing policy requires relevant schemes to provide 50% affordable housing on a habitable room basis, subject to viability.

70 No detail has been provided on the affordable housing offer at this stage, although it is understood that an element of affordable housing will be provided. In accordance with London Plan Policy 3.12, the applicant will be required to demonstrate that the application delivers the maximum reasonable amount of affordable housing. As part of this, a viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.

71 London Plan Policy 3.11 'Affordable Housing Targets' requires that 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale, with priority given to affordable family housing. Subject to the outcome of the viability assessment, the applicant will need to provide robust justification for any departure from this policy, including evidence to demonstrate that the proposed split is based on local need.

Housing Choice

72 The indicative mix of units provides only 5% family sized units, with 46% one-bed and 46% two-bed, although the split between tenures is not yet known. London Plan Policy 3.8 'Housing Choice' encourages a choice of housing based on local needs, while affordable family housing is stated as a strategic priority. Policy 3.11 also states that priority should be accorded to the provision of affordable family housing. The inclusion of duplex/triplex townhouses at ground floor level is welcomed. It is recognised that a significant proportion of one and two bed units may be appropriate in high-rise blocks in this accessible location; however the proportion raises some concerns and the applicant and the Council should confirm that this would meet local housing needs.

73 The application states that the residential units will be built to Lifetime Homes standards and that 10% will be wheelchair accessible. Policy 3.8 requires all new housing to be built to 'Lifetime Homes' standards. In order to bring the London Plan into line with new national housing standards, the draft Minor Alterations to the London Plan proposes to replace this with *"ninety percent of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings'"*. Policy 3.8 also requires 10% of units to be wheelchair accessible or easily adaptable, which the draft Minor Alterations to the London Plan proposes to replace this with *"ten per cent of new housing meets Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users"*. This is set out in more detail in the Housing Standards Policy Transition Statement (May 2015), which sets out how the existing policies relating to Housing Standards in the London Plan should be applied from October 2015. The Council should secure these requirements by condition. Ideally, the reserved Matters should demonstrate on a plan which units will be 'wheelchair user dwellings', to ensure the design of a scheme has considered the standard.

Density

74 London Plan Policy 3.4 'Optimising Housing Potential' states that taking into account local context and character, the design principles in Chapter 7 and public transport capacity, 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 to 260 units) per hectare on a site such as this with a PTAL of 4, although the London Plan notes that these ranges should not be applied mechanistically. GLA officers calculate the density to be approximately 128 units per hectare across the entire site; however, taking the residential site in isolation, it is clearly a very high density proposal. For such a density to be acceptable, the proposals will need to provide a high quality living environment for occupiers, including adequate provision of amenity and play space, an appropriate level of affordable housing, an appropriate mix of unit sizes, high quality design and resolution of all transport and climate change issues. As detailed in this report, some of these issues require further clarification for such a density to be acceptable.

Residential quality

75 London Plan Policy 3.5 'Quality and Design of Housing Developments' promotes quality in new housing provision, with further guidance provided by the Housing SPG. As stated above, the Mayor has published draft Minor Alterations to the London Plan, which have been prepared to bring the London Plan into line with new national housing standards and car parking policy (with an Examination in Public held 21-22 October 2015). A draft Interim Housing SPG and Housing Standards Policy Transition Statement has also been published reflecting these and other changes.

76 Detailed comments on the proposed scheme in relation to residential quality are included under 'urban design and tall buildings' below.

Children's play space

77 Policy 3.6 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation. Further detail is provided in the Mayor's 'Shaping Neighbourhoods: Play and Informal Recreation' SPG, which sets a benchmark of 10 sq.m. of useable child play space to be provided per child, with under-5 child play space provided on-site as a minimum.

78 The Design Code submitted in support of the outline planning application identifies that the provision of play space will be in line with the SPG, which is acceptable.

Historic Environment

Designated heritage assets

79 London Plan Policy 7.8 'Heritage Assets and Archaeology' states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. The proposal will have an impact on designated heritage assets in terms of the Grade II Listed Warmington House (744 High Road), the 'Northern Terrace' including the Grade II listed 794, and 798 – 802 High Road, Grade II* 796 High Road 'Percy House', all within the site; Dial House (Grade II* listed), located at 790 High Road, 792 High Road (Grade II), 797 and 799 High Road (Grade II), 7 White Hart Lane (Grade II), and 707 High Road fronting onto Church Road (Grade II), all outside the application site; and the North Tottenham Conservation Area, which runs along the High Road and part of which is within the site. Other designated

heritage assets lie further away to the north and south along the High Road, and to the west, including listed buildings, as well as the Scotland Green Conservation Area, the Bruce Grove Conservation Area, the Tottenham Cemetery Conservation Area, and the Tottenham Green Conservation Area. The applicant has provided a comprehensive Heritage Statement by Donald Insall Associates (Sept 2015), which provides a detailed analysis of all designated and non-designated assets, including a verified views assessment.

80 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions should *"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"* and in relation to conservation areas, special attention must be paid to *"the desirability of preserving or enhancing the character or appearance of that area"*.

81 The NPPF states that when considering the impact of a proposal on the *significance* of a designated heritage asset, great weight should be given to the asset's conservation, and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the 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. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Recent judgements have provided detailed consideration of the duty imposed on local planning authorities. The Court of Appeal in *Barnwell Manor* held that a finding of harm to a listed building or its setting is a consideration to which the decision-maker must give considerable weight, and that there should be a strong presumption against granting permission that would harm the character or appearance of a conservation area.

Significance of designated heritage assets

82 The applicant's Heritage Statement includes an analysis of the significance of the North Tottenham Conservation Area. It attaches 'high significance' to Tottenham Hotspur Football Club (historic, cultural, communal); the High Road and White Hart Lane (historic); the remaining eighteenth century buildings (architectural and historic), including those in the Northern Terrace, most of which are statutorily listed of national importance, with the Grade II* listed buildings being of 'more than special interest'; and the listed early nineteenth century buildings (architectural and historic), including Warmington House. The Heritage Statement attaches 'significance' to the unlisted Victorian and Edwardian buildings in the area (architectural, historic, cultural, communal), including 746 High Road 'Edmonton Dispensary', 748 High Road 'The Red House', and 750 High Road 'White Hart Public House', all locally listed and within the application site; buildings with cultural value (historic, cultural, communal), including a number of schools, churches, public houses, and other community buildings; and the green (historic, cultural, communal) fronting the Sports Centre and 705-707 High Road, to the south-west of the site. Post war buildings and historic buildings that have been altered are identified as of 'low significance'.

83 The Grade II listed Warmington House is identified as having architectural and historic significance. The listing description identifies the building as of special architectural interest as a house of 1828 retaining its internal plan form, staircases, and a number of original features; and of historic interest as an important survival of the once-numerous Georgian houses that lined the High Road, one of the principal historic corridors into the capital. However the building is currently vacant, boarded up, in poor repair, and included on Historic England's Heritage at Risk

Register. The buildings on either side have been demolished, leaving a scar in the front elevation and negatively impacting its setting. The building has also lost much of its architectural detailing on the front elevation. To the rear of the building is a car park and the existing Stadium, which is prominent in views from the High Road. The low rise utilitarian Spurs Shop to the south of the building further detracts from its setting. The three locally listed buildings to the north form part of the setting of the building, although two of these are vacant and boarded up.

84 The Northern Terrace includes a number of Grade II listed buildings, and three Grade II* listed buildings (late-seventeenth to mid-eighteenth century), which are therefore of 'more than special interest'. All are identified as having high architectural and historic significance and are mostly in use, some in a slightly neglected state.

85 The Heritage Statement also analyses the significance of the other High Road Conservation Areas, including Scotland Green, Bruce Grove and Tottenham Green, attaching 'high significance' to the eighteenth century buildings (architectural and historic), statutorily listed early nineteenth century buildings (architectural and historic), and Tottenham Green (historic, cultural, communal); and 'significance' to unlisted Victorian and Edwardian buildings.

86 The Bruce Castle, Tottenham Cemetery, and Alexandra Palace Conservation Areas are also identified as containing areas of public realm of 'high significance', including Bruce Castle Park, Tottenham Cemetery, the green fronting the Edmansons Close Almshouses, and Alexandra Park.

87 Haringey Council's Tottenham High Road Corridor Conservation Area Appraisal (adopted 2009) covers all of the High Road Conservation Areas, and the North Tottenham Conservation Area has an appraisal in place for the Townscape Heritage Initiative sub-area (adopted 2014), which includes the west side of the High Road opposite the application site, as well as the Northern Terrace. These assessments generally support the applicant's Heritage Statement assessment of significance, and GLA officers concur with the assessments.

Non-designated heritage assets

88 London Plan Policy 7.8 also applies to non-designated heritage assets. Within the site, 746 High Road, the 'Dispensary'; 748 High Road, the 'Red House'; and 750 High Road 'White Hart Public House' are all locally listed, which are therefore classified as non-designated assets. There are a large number of other locally listed buildings within the North Tottenham High Road and other nearby Conservation Areas, as listed in Appendix 8.1 of the application materials. The NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application, and a 'balanced judgement' is required having regard to the scale of any harm or loss and the significance of the heritage asset.

Significance of non-designated heritage assets

89 The 'Dispensary' (c. 1906) is a locally listed building making a positive contribution to the Conservation Area, although it is currently vacant with the windows boarded. The historic significance of the building lies in its original use as a dispensary and its connection to an aspect of the early development of healthcare. Architectural significance is derived from the principal red brick and Portland stone facade to the High Road and the ground-floor shopfront has particular merit. The rear extension and the southern return elevation, recently exposed by the demolition of 744A High Road as part of the consented scheme, detracts in views north along

the High Road. Some original interior fixtures and fittings remain, associated with the dispensary use, particularly at ground floor level.

90 The 'Red House' (c. 1880) is a locally listed building that makes a positive contribution to the North Tottenham Conservation Area. The applicants' Heritage Statement identifies that the historical significance of the building is in its origins as a coffee house and association with the late-nineteenth-century temperance movement, which sought to provide an alternative to the public house as a meeting point for the working classes. Historic and communal value derives from its association with Tottenham Hotspur Football Club from 1922 and in particular for its use as the office of Bill Nicholson OBE (1919-2004), the football player, coach and manager of Tottenham Hotspur. The building is a handsome red brick Victorian structure with steeply pitched roofs. Although the original ground floor coffee house frontage has been replaced, the building maintains a distinct architectural character and although not original, the oriel window adds to that character. The first-floor front room has some historic significance in retained fixtures and fittings that could date from the original use of the building, and historic and communal significance from its use as the office of Bill Nicholson.

91 The former 'White Hart Public House' (c. 1890s) is a locally listed building that makes a positive contribution to the North Tottenham Conservation Area. The applicants' Heritage Statement identifies that the historical significance of the building lies in its construction as an 'improved' public house in response to the growth of the Stadium. The building is typical of the late-Victorian/early-Edwardian period and has a distinct architectural quality that remains largely intact on the exterior, although the interior has been much altered. The building was designed as part of a terrace stretching to the north, demolished as part of the consented scheme, and the exposed northern return elevation of the building detracts from the character of the Conservation Area.

92 The setting of all three buildings is poor, with a car park and the existing Stadium to the rear, which is prominent in views from the High Road.

93 Other non-designated heritage assets, chiefly in the form of locally listed buildings within the North Tottenham Conservation Area and other Conservation Areas are considered in the Heritage Statement in terms of their significance as part of those designated assets.

94 As stated above, Haringey's Conservation Area Appraisals generally support the applicant's Heritage Statement assessment of significance, including non-designated heritage assets.

Impact on heritage assets (designated and non-designated)

95 The proposals involve the demolition of the locally listed buildings at 746 High Road, the 'Dispensary'; 748 High Road, the 'Red House'; and 750 High Road, the former 'White Hart Public House'. This clearly involves the total loss of non-designated heritage assets identified as 'significant' within the North Tottenham Conservation Area by the applicant's Heritage Statement. Taking account of the scale of the loss and the significance of the heritage assets, GLA officers therefore conclude that the proposals will cause 'substantial harm' to the significance of the Conservation Area. According to the NPPF, in these cases, local planning authorities should refuse consent unless it can be demonstrated that this is necessary to achieve substantial public benefits that outweigh the harm. It should also be noted that the Barnwell Manor and Forge Field judgements made clear the strong presumption against granting permission that would cause harm to a Conservation Area, and that a planning authority can only strike the balance between harm and planning benefits if it demonstrably applies that presumption.

96 The applicant justifies these demolitions on grounds of crowd safety, caused by the narrowness of the footway in front of these buildings, which narrows to 2.2 metres (as measured by the Council's independent adviser) and cannot safely accommodate the large match day crowds that travel both north and south along the footway. On match/event days, this pinch point forces pedestrians to walk into the adjoining southbound bus lane during the pre-match period, which is expected to be significantly exacerbated by the increase in the Stadium capacity from 36,000 to 61,000. The previously consented scheme sought to address this by the creation of a new pedestrian walkway (known as the 'canyon') that would funnel pedestrians from the High Road to the rear of the retained buildings and back on to the High Road. This solution allowed the retention of the three locally listed buildings (along with the Grade II listed Warmington House), although GLA officers recognise that this resulted in a rather unsatisfactory arrangement of individual buildings isolated in public space. However, subsequent advice from the applicants' pedestrian movement experts, Movement Strategies, concluded that the vast majority of pedestrians on match/event days would not follow the proposed new pedestrian route/'canyon' and would instead use the quickest and most direct route in front of the retained buildings along the High Road pavement, with spectators regularly moving into the adjacent carriageway bus lane.

97 In response, the applicant explored solutions that would allow the buildings to be retained, including increasing stewarding and policing, and the installation of barriers, to more radical solutions such as temporary and permanent closures of the highway, and the creation of underpasses and flyovers, as set out in the applicants' Crowd Safety Options Appraisal Report. This demonstrates that the only alternative options for retaining the locally listed buildings that are likely to address the requirements for crowd safety are unacceptable in traffic and highways terms and incapable of being delivered. The Report also found that in addition to the significant risks to public safety, the level of overcrowding in this identified pinch point would call into question the ability to secure viable commercial uses for the buildings. Consequently, the current application proposes to remove the three locally listed buildings to create a wider footway of 9.5 metres between the carriageway of the High Road and the proposed Tottenham Experience building. The proposed footway width is considered by the applicant to be sufficient to satisfactorily address the crowd flow issues in this part of the development.

98 GLA officers note that the analysis and conclusions of the Crowd Safety Options Appraisal Report has been confirmed by the Council's independent expert advice. The increased width of the footway could in itself be considered a substantial public benefit, which could outweigh the loss of these buildings (as required by the NPPF), since it resolves public safety concerns. It is also acknowledged that the loss of these buildings may be necessary to deliver the entire proposal, which achieves other substantial public benefits, including new sporting and recreational facilities for public use, a community health centre, the restoration and re-use of the Grade II listed Warmington House, a new museum, 585 new high-quality homes, a new world class Stadium, and the extensive economic and regenerative benefits to the area as discussed under 'Principle of development' above.

99 In coming to a conclusion on the acceptability of the loss of these buildings, GLA officers are required to take account of the strong presumption against granting permission that would harm the character or appearance of a conservation area. The applicants' intention for artefacts and elements of the buildings to be relocated and re-used in the proposed Tottenham Experience Museum is strongly supported; however, taking account of the significance of these buildings as discussed above, GLA officers consider the facade of the 'Dispensary' to be of particular merit, and the applicant should consider the relocation of the entire frontage within the new Tottenham Experience terrace, adjacent to the retained Warmington House. The form of the Dispensary building should allow relocation, unlike the other two buildings, which due to

their corner treatment and gable fronted facades, could not be satisfactorily retained and relocated. This would also benefit the setting of the retained listed building, which would otherwise appear rather isolated in a highly contemporary terrace. Bill Nicholson's former panelled office from the 'Red House' is also considered to be of significance and the applicant should consider its full relocation within the new Museum. The applicant should provide further information on the relocation of these two elements, which would be considered to reduce the harm to an acceptable level in relation to the public benefits provided.

100 Concerning the Grade II listed Warmington House, the building, its interior plan, and features such as the staircase and fireplaces will be retained, with works to its interior and exterior to remove detracting later additions, which GLA officers consider will enhance rather than harm the significance of the listed building and the Conservation Area. Whilst the building was originally built as a detached house, its setting has been much altered over time and the development of the Tottenham Experience building will integrate Warmington House within a contemporary terrace of a similar scale and massing. It is however considered to be important that Warmington House is still able to be read as being detached from the main terrace and that there should be a clearly readable break between the new terrace and the flanks of Warmington House. This has been achieved by introducing glazed infills to the flanks of the building. GLA officers consider that the terrace, whilst differing from the original setting of Warmington House, responds appropriately in terms of scale and massing, preserving and enhancing the listed building and its setting, although as discussed above, the inclusion of the facade of the 'Dispensary' in this terrace would improve its setting. It is recognised that the proposed 22 storey glass-clad hotel tower and the new Stadium will rise up behind the building; however this is not considered to harm the significance of the building or its setting compared to the existing poor situation. The proposed Stadium is in the same location and of similar scale and massing as the previously consented Stadium, which has already been deemed acceptable with regard to its impact on Warmington House, as well as the 'Northern Terrace' including the Grade II listed 794, and 798 – 802 High Road, Grade II * 796 High Road 'Percy House', Dial House (Grade II * listed), located at 790 High Road, and the adjacent property at 792 High Road (Grade II).

101 It is recognised that the majority of the High Road frontage of the site, north of Bill Nicholson Way, has been cleared and is vacant, revealing the utilitarian and incoherent massing of the existing Stadium. It is noted that a Grade II listed building and locally listed buildings that previously occupied this part of the site were demolished under the previous permission. The current situation clearly detracts from the setting of the Conservation Area and statutorily and locally listed buildings. GLA officers consider that the introduction of built form in this area would be beneficial to the Conservation Area, and it is recognised that the scale and massing of the proposed Stadium is similar to, if slightly greater than, that approved under the previous permission.

102 The proposals will also impact on heritage assets further away from the site, including those within the North Tottenham Conservation Area, the Scotland Green Conservation Area, the Bruce Grove Conservation Area, the Tottenham Cemetery Conservation Area, and the Tottenham Green Conservation Area, including statutorily and locally listed buildings. The applicant has provided a series of photographs, visual representations, and wirelines to illustrate this impact, and an analysis of these impacts is included in the Heritage Statement. The Statement assesses the impact of the proposals on the wider North Tottenham High Road Conservation Area as being entirely positive; however GLA officers consider that the proposals will cause some harm, for example to View 27, where the Stadium will rise up significantly behind the northern terrace, containing Grade II, II* and locally listed buildings, and to a somewhat greater degree than the consented Stadium. However, the harm caused to the significance of the Conservation Area and the setting of the statutorily and locally listed buildings is considered to be 'less than substantial' and outweighed by the very significant

public benefits discussed above. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area, and have placed considerable importance and weight to the harm caused to the setting of the listed buildings.

103 GLA officers also consider that some harm will be caused to the significance of the North Tottenham Conservation Area, as demonstrated by Views 31, 32, and 33, although the harm is considered to be 'less than substantial', and outweighed by the very significant public benefits discussed above. In coming to this conclusion, GLA officers have again taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area.

104 The Heritage Statement finds that some harm will be caused to the significance of the Bruce Castle Conservation Area (View 11), Scotland Green Conservation Area (View 36), and Bruce Grove Conservation Area (View 37). GLA officers agree with this assessment and consider that the harm is 'less than substantial' and outweighed by the very significant public benefits discussed above. Although the proposed taller buildings would be visible in longer views from the Alexandra Palace and Tottenham Cemetery Conservation Areas, GLA officers do not consider that this would result in harm to their significance, due to the intervening distance and shielding from existing urban form and trees. In coming to this conclusion, GLA officers have taken account of the strong presumption against granting permission that would harm the character or appearance of the Conservation Area.

105 The proposals will not affect any strategic views as identified in the Mayor's London View Management Framework SPG.

Urban Design and tall buildings

106 Good design is 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 policies 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).

107 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. This also raises potential safety and anti-social behaviour concerns, particularly at night. The applicant should provide further information on how these spaces will be managed in order to counter these concerns.

108 The South Podium Square is described as the size of 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 (MUGA); and seating areas for the surrounding café and restaurant uses. The north, east and west sides of the Square allow free 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.

109 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 will require careful detailed design in order to ensure that the entrance is integrated into the building fabric, while being clearly legible to help orientation and avoid interference with crowd movement on match and event days. The proposed use of a large expanse of glass cladding on the south-facing 'prow' of the building may not be the best response to large event day crowds and should be reconsidered. The proposed rooftop cafe in this location also raises some safety concerns. The ground floor of the neighbouring proposed hotel extends in a V-shaped projection into the Plaza public space, acting as a barrier to circulation around the building, blocking views of the podium access stairs and lift to the east of the hotel, and serves to split the Plaza into two separate spaces. The applicant should reconsider this layout or provide further justification.

110 The majority of Worcester Avenue, beyond the existing houses to the north, is currently of very poor quality, lined with inactive uses. On the west side, within the site, is the existing Stadium East Stand, with blank frontages other than on match days, and hoarding further north. Much of the east side of the road is lined by blank walls associated with the neighbouring schools. The proposals seek to activate the southern end of Worcester Avenue, including residential access to Tower A and commercial access to the proposed ground floor flexible use space. This is secured within the Design Parameters for the residential part of the outline application. To the north of this is the Stadium, with the corporate hospitality entrance and some management office uses; and the Community Health building, with servicing access, circulation and servicing at ground floor level. It is accepted that these spaces are required for Stadium access and circulation and consequently, active uses outside of event days will be relatively limited, although some activity will be provided by the ground floor foyer for the Community Health building. The proposals to introduce tree planting and other landscaping to create shared space on Worcester Avenue is strongly supported in order to improve its quality, with pedestrian zones delineated from vehicular/servicing routes through the positioning of trees and street furniture, which ensures a safe and fully inclusive environment. The applicant should clarify the landscape design/uses at the south end of Worcester Avenue, which are not clearly detailed in the application materials.

111 The residential component of the proposal is submitted in outline with full details of layout, scale and access; 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.

112 The introduction of duplex or triplex maisonettes on Park Lane, with defensible space in the form of small front gardens is welcomed, as this will help to relate the larger scale of the residential buildings 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.

113 The Design Code and Parameters also secure the maximum height of each of the residential and Extreme Sports buildings. Although CABE/EH Guidance on Tall Buildings (2007) calls for tall buildings to be submitted in full application form, in this case the Design Code and Parameters are considered to be sufficiently rigorous to ensure a high quality development. The Council should ensure that any permission secures compliance with the Design Code and Parameters. Retention of the residential scheme architect is strongly encouraged.

114 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.

115 The glass-clad curtain walled hotel building is somewhat at odds with the immediate context of the High Road Conservation Area, although this helps to visually distinguish the building as commercial, and relates well to the more contemporary materials of the Stadium cladding. The 22 storey 'blade' shaped massing provides an interesting visual contrast to the rounded massing of the lower-rise Stadium.

116 The cladding of the Stadium is primarily a light coloured metallic mesh wrap, with glazed curtain walling to the south stand. Detailed design should ensure that the cladding retains its simplicity and light colouring, respecting its historic context. This is particularly important in the historic High Road context, where the projecting glazed escalator box on the western elevation has the potential to enliven the facade; however detailed design should ensure an elegant response that allows easy maintenance in order to maintain a high quality appearance.

Inclusive design

117 The aim of London Plan Policy 7.2 'An Inclusive Environment' is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum). Inclusive design principles, if embedded into the development and design process from the outset, help to ensure that all of us, including older people, disabled and Deaf people, children and young people, can use the places and spaces proposed comfortably, safely and with dignity.

118 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 details design. Access standards are suitably secured in the Parameter Plans.

119 The design of the landscaping and the public realm is crucial to how inclusive the development is for many people. The podium level public spaces are accessed by stairways and

are generally accompanied by lift access; however no lifts are included within the south-west corner of the site, adjacent to the Tottenham Experience and ticketing facilities. Access to the podium level and the Stadium is only available via two banks of stairs and an additional general access lift should be included in this location. As discussed above, the nearest lift access is hidden by the V-shaped projection of the hotel. Further lift access should be incorporated in this location.

Transport

120 TfL has held pre application discussions with the applicant on the non-event day elements of their proposals, as well as recently issuing detailed feedback on the wider proposed development.

Major events – football matches, NFL and concerts

121 The applicant has used weekday match day survey data recorded in May 2014 to inform the trip generation for match days. The use of up to date data is welcomed; however the applicant should clarify how their mode split has been derived. In addition, a weekend modal split should also be provided. The applicant should also confirm how many operational trips (staff etc.) will be generated and how they will travel. Furthermore, the applicant should always provide the absolute trip numbers associated with any modal split so assumptions can be avoided.

122 It has been assumed that approximately 60% of spectators will spend at least 45 minutes or more in the local area before kick-off for a week evening match, which is not considered realistic. Post-game, the applicant should clarify the dwell time for spectators after the match and justify how this will be achieved.

123 A pre- and post-match entertainment programme has been submitted; however this relates to a 15:00 weekend kick-off only, for which no dwell times have been provided. Encouraging a smoother arrival and departure profile is an important element in reducing queues at public transport hubs and therefore weekend dwell times, the proposed entertainment programme for a weekly game, and the spectator departure profile following a home match loss, should all be provided.

124 Two National Football League (NFL) games per season will be hosted and have been assumed to take place on a Sunday. The applicant should provide the data used to inform the trip assumptions.

125 The applicant has assessed the impact of both a 45,000 and 55,000 capacity concert. These are assumed to take place on a Saturday evening. The applicant should clarify how the arrival and departure profile has been derived and provide the data used to inform the trip assumptions.

126 The site is well served by bus routes and it is accepted that there will not be an impact on the capacity of the local bus network. Nevertheless, more discussion is required with the applicant regarding the potential relocation of local bus stops and future bus diversions.

127 Approximately 3% of spectators will use walking as their main mode to and from the stadium. As stated above, an assessment has been undertaken to assess local footway capacity, which has identified particular concern with pinch points along the High Road which can disperse pedestrians into the adjoining southbound carriageway bus lane creating a potential safety issue. On that basis, the applicant proposes to widen the footway on the High Road,

which is not objected to in principle; however as the High Road is part of the SRN and a key bus corridor, any highway amendments will need to be agreed with TfL and the impact on bus and traffic performance understood. The applicant should also confirm how the other deficiencies will be remedied as part of the package of necessary mitigation identified in their assessment required in accordance with London Plan Policy 6.10 'Walking'.

128 A car mode split of 23% has been assumed for home spectators and 10% for away spectators. This is consistent with the 2010 scheme and represents a significant reduction from the stadium mode split of 45.6% last recorded in 2014. The predicted car mode share for both NFL and concerts is notably lower.

129 The applicant has identified a local parking capacity of 5,725 spaces; however it should clarify whether this capacity is based on the maximum distance a car user would be willing to walk to the Stadium once parked. Furthermore, the increase of car parking from 319 spaces proposed in 2010 to 822 currently proposed on site should be justified.

130 As with the 2010 scheme, no highway impact assessment of major event day traffic has been undertaken on the assumption that the level of vehicular use is capped as existing and this is accepted.

131 Total coach demand for a match day is expected to be less than 30 coaches per game mainly associated with away spectators, which the applicant expects to be accommodated within the nearby industrial area. The applicant should assess the coach numbers for both the NFL games and concerts as it is expected that their demand will be greater. Overspill parking will be accommodated on Pretoria Road; however details of the management of this should be clarified.

132 The proposed taxi rank on Park Lane is supported; however the applicant should provide additional detail on its capacity and operation. Provision will also need to be made for private hire vehicles. More discussion with TfL is required on this matter, including the extent of taxi queue marshalling required.

133 In accordance with London Plan Policy 6.9 'Cycling', the applicant should review the proposed design of Park Lane in order to provide similar levels of service for cycling as that provided by the nearest section of Cycle Superhighway 1 on Church Road. Furthermore, to help identify issues of severance and cycle safety, a study of the 'cycling level of service' (CLOS) of the existing streets within the vicinity of the site is requested.

134 The applicant has over-estimated the future rail capacity on London Overground services but has still identified capacity constraints during peak hour rail services (including Abellio Greater Anglia services) and at the weekend on London Overground services. In addition, all local stations will experience post-match queues. This element of their assessment should therefore be amended with the correct capacity figures and using a robust arrival and departure profile. TfL is nevertheless concerned with the impact of queues outside rail stations when the effect of additional passengers interchanging at Tottenham Hale and Seven Sisters is taken into account. On that basis, more discussion is required with the applicant on their technical assessment to ensure that the impact of additional passengers is fully understood.

135 Based on the assessment undertaken to date, TfL understands that demand at Tottenham Hale station in the mid-week pre-match period could be 7,788 spectators, an increase from the 1,314 spectators observed in 2008. The applicant's assessment notes that proposed upgrades at Tottenham Hale station will deliver additional ticket hall and gate line capacity, with vertical capacity remaining a constraint at peak periods, exacerbated by match day demand. In order to mitigate the impact of this additional demand, minimise the impact of

queuing, and support the applicant's proposed mode shift to public transport, it is recommended that additional escalator capacity is provided at one of the Victoria Line stations. As with the 2010 scheme, the applicant predicts that additional demand for Underground services should be encouraged at Tottenham Hale. This is considered reasonable given the planned and recent upgrades at this interchange and the existing capacity constraints at Seven Sisters station. In the case of either station, the expected cost of an additional escalator would be £3.6 million, but if delivered with the planned Tottenham Hale station upgrade this would reduce to £3 million. In accordance with London Plan Policies 6.1 'Strategic Approach' and 6.2 'Providing Public Transport Capacity', TfL would welcome further discussions with the applicant concerning a contribution to help deliver these works.

136 Two shuttle bus services will be operated, the first tailored towards premium ticket holders and serving Tottenham Hale, and the second available to all and routed to Alexandra Palace via Wood Green. The principle of this is supported; however more information on its operation is required in order to fully understand the potential of this service to address match day demand.

137 No cycle parking is proposed for the Stadium as provision already exists at Lilywhite House. The quantum of spaces and distance for Stadium employees needs to be clarified before this can be considered acceptable. As there are no specific London Plan cycle parking standards for a Stadium, the applicant could consider a cinema as a place of assembly to be comparable. This land use has a requirement of one space per 50 seats, which would correspond to 1,120 spaces. This would cater for the 1% cycling mode share predicted and any potential future increase. More discussion on this matter should be undertaken with TfL.

138 The applicant should provide details of the delivery and servicing requirements of a major event and demonstrate how this will be accommodated on site.

139 It is understood that the Travel Plans associated with the consented development will be updated and new ones added for the different aspects of development. These will need to be provided to TfL for assessment prior to the consent of any planning permission. The applicant should also confirm that other match day controls secured with the previous consent will be updated including match day CPZs and the Local Area Management Plan (LAMP).

Non-event day impacts – residential, hotel, serviced apartments etc.

140 It is accepted that observed traffic flows along the High Road are lower than assumed in the 2010 assessment; however it is noted that the Sainsbury's store has yet to trade to its full potential. As the area is regenerated, trips would be expected to increase and therefore the baseline should reflect the original 2010 vehicular trips associated with the retail element.

141 The applicant should provide a full multi-modal split for all land uses proposed, which includes all day trips, weekday and weekends. The number of trips interchanging onto the Victoria Line at both Tottenham Hale and Seven Sisters also needs to be assessed.

142 For residential uses, the applicant has used comparator sites associated with enabling residential development associated with the Emirates Stadium; however the trip generation assumptions are considered to have underestimated car trips. It is recommended that validated TRICS and ward census data is used.

143 It is considered that trips associated with the Tottenham Experience and non-event day attractions have been underestimated, and more justification should be provided on how the trip numbers were derived.

144 For the flexible community/office use, an impact assessment that considers the highest trip generating potential occupier is required.

145 For the health centre, hotel, and serviced apartments, the trip generation data is not considered to be reflective of the local area and the survey sites used are too dated. On that basis, new surveys should be identified and a manual adjustment of trips may be required to ensure it is robust. In addition, the assessment should include coach and taxi trips.

146 The baseline traffic flows should include the northern development trip generation as originally predicted. The all-day flows should also be provided to allow TfL to validate the peak trip numbers. Furthermore, as stated above, it is considered that vehicular trip generation could have been underestimated.

147 There is a discrepancy in the submission material on the number of car parking spaces provided for residential uses and this should be clarified; however TfL would consider a parking ratio of 0.47 spaces per unit (a total of 275 spaces) to be broadly consistent with London Plan Policy 6.13 'Parking'. A further reduction would be supported. The applicant should demonstrate how the proposals could accommodate the London Plan Housing SPG requirement of one Blue Badge space per wheelchair accessible unit. Nevertheless, it is welcomed that electrical vehicle charging points (EVCPs) will be forthcoming in line with London Plan minimum standards.

148 The 53 car parking spaces proposed for the hotel will need to be justified, as the London Plan requires hotel parking for areas with a good PTAL to be limited to operational needs only.

149 In total, 56 on-street pay and display parking bays are proposed on Worcester Avenue. A parking accumulation survey is required to ensure that these spaces are appropriate.

150 As with the Stadium, no cycle parking is proposed for the Tottenham Experience as provision already exists at Tottenham Football Club's offices to the north of the site. The quantum of spaces and distance from potential places of work needs to be clarified before this is considered acceptable.

151 For the hotel, the applicant proposes 12 spaces at basement level, which is assumed to be staff parking. To improve accessibility, these should be located closer to the core. Short stay visitor spaces will also be required.

152 A total of 12 cycle parking spaces on Worcester Avenue are proposed to serve the health facility; however it is not clear how these will be allocated between short stay and long stay. Any long stay staff spaces should be provided within the building, as this will enhance their security. The standards are based on staff numbers, which therefore needs to be clarified in order to assess the provision against the policy requirements.

153 For the Extreme Sports facilities, 16 cycle parking spaces are proposed on Park Lane; however it is not clear how these will be allocated between short stay and long stay. As stated above, any staff parking should be within the building. Notwithstanding this, the provision is inadequate as the London Plan requires short stay spaces to be provided at 1 space per 100 sq.m., which equates to 21 spaces in this instance. Long stay spaces are based on staff numbers, which therefore needs to be confirmed.

154 In total, 872 cycle parking spaces are provided for the residential units at ground floor level, which falls just short of the London Plan requirement of 882 spaces and should be

increased. The applicant should demonstrate that their access is consistent with the London Cycle Design Standards.

155 The applicant should demonstrate that space is available to accommodate the maximum provision of cycle parking spaces required for the range of land uses that could occupy the flexible floorspace. A condition is sought to require the delivery of the appropriate number of cycle spaces required upon occupation.

156 All staff employed on site should be provided with access to shower and changing facilities. Due to its size, these facilities should be provided across the whole site and close to cycle parking to ensure that they are convenient. Short stay spaces are required for all land uses and should be provided within close proximity of the venue.

157 Taxi and PHV demand should be provided to TfL, which will confirm the acceptability of the proposed taxi rank on Park Lane.

158 The applicant should assess coach demand; however on non-event days, space will be available within the hotel for coach parking, the capacity of which needs to be confirmed.

159 The applicant should provide details of the freight requirements of each land use and demonstrate how this will be accommodated on site.

160 The proposed construction compound would mean that expected construction vehicles would only increase by 3% from the 2010 application; however an increase of 33% would be expected without this in place. Given the scale of the development, a framework Construction and Logistic Plan (CLP) should be provided.

161 It is understood that the Travel Plans associated with the consented development will be updated and new ones added for the different aspects of development. These should be provided to TfL for assessment prior to the consent of any planning permission.

Community Infrastructure Levy

162 In accordance with London Plan Policy 8.3, the Mayoral Community Infrastructure Levy (CIL) came into effect on 1st April 2012. All new developments that create 100 sq.m. or more of additional floor space are liable to pay the Mayoral CIL. The levy is charged at £35 per square metre of additional floor space in Haringey. Haringey Council also commenced CIL charging in November 2014.

Climate Change

Energy

163 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include low energy lighting and mechanical ventilation with heat recovery.

164 The demand for cooling will be minimised through solar shading and solar control glazing, including low g-values for areas without shading that are at risk from high gains.

165 BRUKL sheets have been provided for the detailed elements of the application, which show the building performance against the Part L solar gain checks. The BRUKL documents show that a number of spaces will exceed the solar gain limits. The applicant has stated that these are circulation spaces and are exempt from Building Regulation compliance checks. The applicant should provide further evidence to demonstrate that the cooling demand has been reduced in line with Policy 5.9 'Overheating and Cooling'. Dynamic thermal modelling following TM52 and TM49 guidance is recommended.

166 No modelling has been undertaken for the outline application due to the limited detail available at this stage. However, the applicant has stated that passive measures will have been incorporated in the design considerations and will continue to be coordinated during design development in order to minimise overheating risk and excessive cooling demand. Dynamic overheating modelling in line with CIBSE Guidance TM52 and TM49 should be undertaken at the reserved matters stage. The applicant should particularly consider how best to mitigate any restrictions posed by match day and event noise, local air quality issues, ground floor single storey apartments and single aspect units.

167 The development is estimated to achieve a reduction of 220 tonnes per annum (5%) in regulated CO2 emissions under the first stage of the energy hierarchy ('Be Lean'), compared to a 2013 Building Regulations compliant development. Sample SAP calculation worksheets (both DER and TER sheets), including efficiency measures alone should be provided to support the savings claimed.

168 The site is located within a district heating opportunity area and has been subject to a number of heat mapping studies investigating the potential for an area wide heat network. The site is located within a key development area for a district heating network and Haringey Council has identified the site as a possible location for the Haringey heat network energy centre.

169 It is understood the applicant has been involved in ongoing discussions with the Council regarding the potential provision of an oversized energy centre on the site, which would provide heat to surrounding sites. It is also understood that the applicant is unwilling to provide this energy centre infrastructure on the site due to design and access concerns, with the taller building, most suitable to allow flue gas dispersion, being located away from the road frontage. Notwithstanding this, given the scale and key location of the development, the applicant is strongly encouraged to continue to investigate the feasibility of including additional space within the energy centre, to help facilitate the development of the Haringey heat network. The applicant should commit to continue to work with the Council to support the delivery of the Haringey heat network and provide evidence of correspondence with the Council regarding this matter.

170 The applicant is proposing a heat network supplying the Phase 1 elements (Stadium, the Tottenham Experience and the Community Health building), with provision made for connection to the Haringey network. Phase 2 elements of the application (Hotel, Extreme Sports buildings and residential towers) will be connected to the Haringey heat network; however, it is not clear how the Phase 2 elements will link into the site wide heat network, for instance, whether the Stadium plant room will serve the Phase 2 buildings or whether there will be additional plant rooms. The applicant has stated that the details of the site wide layout and connection of the Phase 2 elements will be developed with Haringey Council; however this approach is not accepted as the applicant is required to demonstrate how the site wide network has been designed to allow for connection to the Haringey heat network, including the connection point. Further information is required to clarify this point.

171 For the development to be fully future proofed for connection to the Haringey heat network, the development should be served by a site wide heat network from a single energy centre, with a single connection point. The applicant should therefore confirm that all apartments and non-domestic building uses will be connected to the site heat network to be served by a single energy centre. A drawing showing the route of the heat network linking all buildings on the site should be provided. The applicant should provide further information on the interim heating solution, including clarification of the number of plant rooms and how they will be decommissioned. A proposed approach that results in multiple gas boilers providing heat to each iterative stage of the development is unlikely to be supported as it would prove costly to retrofit to either connection to the Haringey heat network (if available) or a single site-wide CHP powered network.

172 The applicant has identified an area for a potential site wide energy centre within the basement of the residential towers development, should connection to the Haringey heat network not be possible. The applicant has stated that further details of the energy centre design will be developed if the preferred strategy of connecting into the Haringey heat network is not realised. The applicant should provide information on the site wide energy centre, including size, location and layout in order to demonstrate that a site wide energy centre could be accommodated in the event that connection to the Haringey heat network is not possible. As the applicant has cited access and management concerns around the provision of an oversized district energy centre in this location, it is reasonable to expect these constraints would also apply to a site-wide CHP energy centre. The applicant should detail how these constraints would be overcome, in order to provide sufficient confidence that either a connection to the Haringey heat network or a site-wide CHP is the ultimate energy strategy applied to the site, and that any proposed interim solution does not become permanent if it proves unfeasible to implement an energy centre (oversized district or site-wide CHP) in the residential block.

173 While it is acknowledged the applicant is pursuing connection to the Haringey heat network as its first priority, which is supported, the current approach leaves an unacceptable level of uncertainty as to what the ultimate energy solution will be if the residential site is unable to support an energy centre. Any section 106 agreement that addresses this issue must provide the Council with clear trigger points for assessment and decision, either on connection to the Haringey heat network or implementation of a site-wide CHP network. Further information is required to demonstrate the long-term approach should these options prove unfeasible or unviable.

174 The applicant is proposing to allow connection to the Haringey heat network, which will include gas fired CHP. The applicant has stated that the carbon intensity of the network is not yet known and the applicant has used the carbon intensity factor for a typical heat network taken from the national calculation methodology at 0.15 kgCO₂/kWh.

175 Should connection to the Haringey heat network not be possible, then the applicant is proposing to install a 770 kWe /872 kWth gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (62% of the total heat load). The CHP has been sized to provide the same carbon intensity for heat as used for the Haringey district heating scenario. The applicant should provide further information on how the CHP has been sized, including suitable monthly demand profiles for heating, cooling and electrical loads.

176 A reduction in regulated CO₂ emissions of 730 tonnes per annum (17%) will be achieved through this second part of the energy hierarchy ('Be Clean').

177 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install roof mounted photovoltaic (PV) panels on the roofs of the residential towers. The applicant should provide an indicative roof layout drawing to demonstrate that there is sufficient capacity to accommodate the proposed PV array.

178 The applicant has stated that the roof area for PV is limited, due to shading on the low rise buildings, and due to the lightweight structure design on the Stadium roof. Whilst it is acknowledged that the low rise buildings may not be appropriate, the large Stadium roof presents a major opportunity to increase energy generated through renewable technology. The applicant should therefore investigate an integrated PV panel solution using lightweight technology such as thin film photovoltaics, in order to maximise on-site savings.

179 A reduction in regulated CO2 emissions of 20 tonnes per annum (0.5%) will be achieved through this third element of the energy hierarchy ('Be Green').

180 The Environmental Statement indicates that the development will incorporate back up diesel generator plant, which is anticipated to operate for 8 hours for 30 days a year (240 hours per annum) on event days, in order to supplement the power required at these times. Including maintenance running this increases to 292 hours per year (maximum). The hotel and residential generator plant are backup emergency power generators and will undergo a maximum of 1 hour of maintenance per week (52 hours per annum). Therefore these generators have been assumed to operate for a worst-case of 52 hours per year. The applicant is requested to provide further information on these generators in order to allow the energy use from the diesel generators to be determined. The applicant should detail the size of the generators, the anticipated energy generated per annum, carbon emissions, where the energy generated will be used, and how this information has been taken account of in the submitted energy statement.

181 Based on the energy strategy submitted a reduction of 970 tonnes of CO2 per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 22%. The carbon dioxide savings fall short of the target within Policy 5.2 of the London Plan and the applicant should consider the scope for additional measures aimed at achieving further carbon reductions. London Plan policy requires on-site measures to be prioritised and the use of off-site measures or cash-in-lieu contributions are only accepted where it is clearly demonstrated that specific targets cannot be fully achieved on-site.

Climate change adaptation

182 The site is located predominantly within Flood Zone 1 with a small portion of the site within Flood Zone 2. The site is also generally free from surface water flooding, although it should be noted that a significant stretch of the A10 Tottenham High Road adjacent to the site is shown to be at risk from surface water flooding. Therefore the application of London Plan Policy 5:13 'Sustainable Drainage' is an important consideration for this application.

183 The Flood Risk Assessment (FRA) and Water Strategy both comment on surface water management for the site; however these documents are inconsistent and neither document is satisfactory in relation to its approach to London Plan Policy 5:13. The Water Strategy approach to sustainable drainage appears to be based on discharging up to 1132l/s (150l/ha/s) from the site; however the FRA states that up to 1260l/s may be discharged, in line with the 2010 proposals. The FRA later states that there will be a design outfall rate of 358l/s; however it is not clear how this relates to the earlier figures of 1132l/s or 1260l/s.

184 The Water Strategy states that rainwater harvesting will not be used as the Stadium pitch specialist will not endorse this, and also that the Stadium urinals will be of a waterless design; however it later states that rainwater harvesting is proposed for the Stadium roof.

185 Neither the Water Strategy nor the FRA reference the contribution to run-off reduction that will be made by green roofs and landscaping, nor to the fact that landscaping could be deliberately designed to maximise water absorption/attenuation properties.

186 Infiltration appears to be dismissed on the basis of underlying soils; however given the size of the site there are likely to be areas with permeable soils and consequently this assumption should be tested with on-site soakage tests.

187 There may be a need for sub-surface attenuation tanks to manage residual surface water flows; however the requirement for these should only be considered after the contribution of more sustainable options has been assessed, and the maximum discharge rate from any such tanks should be clearly stated.

188 The principle of including an element of design for exceedance is welcomed, and the FRA indicates that this will be contained within the Stadium. Discharging residual surface water to the Moselle Brook culvert is preferred to discharge to the Thames Water sewer network.

189 A fresh approach to the drainage regime is required for the application to be considered compliant with London Plan Policy 5:13. This should start from a position to seek to achieve greenfield run-off rates; however if this is not achievable then a reduction of at least 50% on current site run-off rates should be targeted. Given the scale of the proposals this is an important consideration and should be resolved prior to any Stage Two referral to the Mayor.

Air quality

190 The site lies within an Air Quality Management Area (AQMA) and an Air Quality Assessment has been undertaken in line with London Plan Policy 7.14 'Improving Air Quality'. The proposal includes gas-fired boilers and diesel-fired generators.

191 Long term impacts on NO₂ will be up to slight adverse (assuming road traffic emissions decrease as predicted) or substantial adverse (assuming no reduction in road traffic emissions). Concentrations will increase at locations where the air quality objective (AQO) is already exceeded. Impact on long term concentrations of PM₁₀ are predicted to be up to moderate adverse, but concentrations are not predicted to exceed the AQO.

192 Short term impacts of the energy plant have been modelled and are predicted not to cause exceedences of the short term AQO but they were not modelled in combination with the impact of road traffic and, in particular, with the impact of actual event day traffic which would be expected to include significant queuing traffic and a high proportion of HDVs (coaches). Road traffic data also shows no change in speed as it uses annual average data.

193 The short term impacts on NO₂ and PM₁₀ concentrations should be re-modelled based on around 30 matches per year during the football season, plus 16 events during the summer months, for instance using a real schedule for a previous year, and 5 years of Met data. This re-modelling should be provided to the GLA.

194 The gas boilers will conform to a maximum NO_x emission of <40 mg/kWh, which meets the standard required. The compression ignition diesel generators will meet the ULEZ 2015

standards for non-road mobile machinery, EU Stage IIIA. The applicant should confirm that the cleanest possible diesel-fired generators (Stage IV) will be used.

195 Overall, the development is air quality neutral for transport and buildings; however further modelling should be provided as above.

Local planning authority's position

196 Haringey Council's position is not yet known.

Legal considerations

197 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008, the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 of the Order to refuse the application, or issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application and any connected application. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

198 There are no financial considerations at this stage.

Conclusion

199 London Plan policies on regeneration; mixed use; town centre uses; sports and recreation; visitor infrastructure; housing; affordable housing; historic environment and loss of heritage assets; urban design and tall buildings; inclusive design; transport; climate change; and air quality are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Regeneration and economic development:** The proposals are supported in line with London Plan policies on regeneration and economic development.
- **Mixed of uses and town centre uses:** The proposals are acceptable in relation to London Plan policies on mix of uses and town centre uses.
- **Sports and recreation:** The proposed sports and recreation facilities are strongly supported in line with London Plan policies.
- **Visitor infrastructure:** The proposal to include a hotel and serviced apartments within the development is supported.
- **Housing:** Housing provision on this site is supported in principle; however the Council should confirm that this would meet local housing needs. The residential density of the proposals may be acceptable, subject to the resolution of other issues raised in this report.

- **Affordable housing:** No information has been provided on the affordable housing offer at this stage and the applicant is required to demonstrate that the application delivers the maximum reasonable amount of affordable housing. A viability report is expected to be independently assessed on behalf of the Council, with the results to be shared in full with GLA officers.
- **Historic environment:** Taking account of the scale of the demolition and the significance of the heritage assets, GLA officers therefore conclude that the proposals will cause 'substantial harm' to the significance of the Conservation Area and total loss of locally listed buildings. The substantial public benefits arising from the proposal could outweigh the loss of these buildings; however, taking account of the significance of these buildings, the applicant should consider the relocation of the entire frontage of the 'Dispensary' within the new Tottenham Experience terrace, and the relocation of Bill Nicholson's former panelled office from the 'Red House' within the Museum. Harm to some other heritage assets is considered to be 'less than substantial' and outweighed by the considerable public benefits.
- **Urban design and tall buildings:** The proposals are considered to be of a high design quality and potentially iconic; however the applicant should provide further information on how the podium level public spaces will be managed in order to counter concerns about levels of activity and overlooking. Further consideration should be given to the ground floor layout and design of the Tottenham Experience building and the hotel. The applicant should clarify the landscape design/uses at the south end of Worcester Avenue.
- **Inclusive design:** The approach to inclusive access is generally acceptable; however an additional general access lift should be included from the Plaza to the first floor podium level.
- **Transport:** The applicant will need to work closely with TfL to ensure that the impact assessment is sufficiently robust, as there are concerns that the peak period for trips has potentially been underestimated. More discussion would then follow to identify appropriate mitigation and ensure that the scheme is designed appropriately to cater for the expected uplift in trips. In addition, justification for the quantum of proposed cycle parking, car parking and scheme layout are required.
- **Climate change:** The applicant should provide evidence to demonstrate that the cooling demand has been reduced; sample SAP calculation worksheets; further details on the site wide network and energy centre; further details on the CHP unit; further information on photovoltaic options; and further information on the diesel generators. The applicant is strongly encouraged to continue to investigate the feasibility of including additional space within the energy centre, to help facilitate the development of the Haringey heat network. The Flood Risk Assessment and Water Strategy are contradictory and should be clarified. A fresh approach to the drainage regime is required for the application to be considered compliant with London Plan Policy 5:13.
- **Air quality:** The short term impacts on NO₂ and PM₁₀ concentrations should be re-modelled based on around 30 matches per year during the football season, plus 16 events during the summer months. The applicant should confirm that the cleanest possible diesel-fired generators will be used.

200 On balance, while the application is generally acceptable in strategic planning terms, the application does not yet comply with the London Plan for the reasons set out above; however the possible remedies set out above could address these deficiencies.

for further information, contact GLA Planning Unit (Development & Projects Team):

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