

## Environmental Services and Community Safety

Tracie Evans – Chief Operating Officer



Neil McClellan  
Planning

Date: 18<sup>th</sup> November 2015

Your ref:

Our ref:

Dear Neil

### **Re: Tottenham Hotspur Football Club, 748 High Road, London, N17 0AP** **Planning application: - HGY/2015/3000**

The above application is for proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "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 sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 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 proposal is EIA development.

ADDITIONAL ENVIRONMENTAL INFORMATION HAS BEEN SUBMITTED AND IS VIEWABLE ON THE WEBSITE.

The following comments are made with consideration of the additional environmental information that has been submitted together with apposite conditions.

#### **Air Quality:**

The application site which includes a stadium, hotel, sports centre, residential and health centre is adjacent a main road of air pollution concern, the High Road; a major route into London for which both monitoring and modelling indicates exceedences of the Government's air quality objectives for nitrogen dioxide (NO<sub>2</sub>) and PM2.5. The whole of the borough of Haringey is a designated Air Quality Management Area (AQMA) and is committed to being a 'Cleaner Air Borough' and working towards improving air quality and to minimise the risk of poor air quality to human health and quality of life for all residents. Whilst the proposed development will introduce new exposure adjacent this major arterial route into London, the proposed residential units are located away from the High Road, adjacent the Park Lane / Worcester Avenue corner.

An air quality assessment (Air Quality Consultants, August 2015, ref: J2299) has been submitted along with the planning application to assess the air pollution impact of the proposed developments. The main air polluting operations associated with the entire site include 1224 car parking spaces and associated traffic movements, 13.5MW gas powered boilers and 4.5 MW diesel generators; assessed during peak periods of stadium use. The diesel generators are proposed to be used as a primary source of power on match days and event days, for which the air quality assessment has determined will have an adverse impact on air quality in the local area.

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The London Plan, Policy 7.14 states that new development should:

- minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAs) where development is likely to be used by large numbers of those particularly vulnerable to poor air quality, such as children or older people) such as by design solutions, buffer zones or steps to promote greater use of sustainable transport modes through travel plans
- promote sustainable design and construction to reduce emissions from the demolition and construction of buildings;
- be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).
- Ensure that where provision needs to be made to reduce emissions from a development, this is usually made on-site.

The use of polluting diesel powered generators as a primary power source is unsatisfactory and discouraging; especially in the light of the work being carried out towards improving air quality. Following discussions with the applicant additional information has been submitted specifically with regard to air quality and the use of the diesel generators. The 'Regulation 22 – Further Environmental Information' submitted (November 2015) states ... *diesel generators will only be used for emergency backup generators on match day and will comply conform to the US Tier 3 (EU Stage IIIA). It is considered this will have a minimal impact on air quality on local receptors and remove the adverse impact to that of negligible'...*

Further information has been submitted via an AQ Note (Air Quality Consultants, November 2015). Section 3.1 of the AQ Note states '*THFC have committed to connecting to the UK Power Network (UKPN) for match day primary power provision, with no onsite power generation for match days*'. Further affirming that onsite power generation by diesel would only occur during emergency situations and that the generators will operate a maintenance schedule of a maximum of 1 hour per week (52 hours per year). The air quality impact will therefore be significantly reduced.

The aspiration is that in future the site will connect to a District Energy Network (DEN). However should this connection not be forthcoming then there will be a site-wide energy centre, operating gas fired CHP.

This is also confirmed by the Energy Strategy Clarification Note additional information (6<sup>th</sup> November 2015 Buro-Happold Engineering);

*'2.3 The indicative phasing plan for the Development anticipates that the stadium, the Tottenham Experience and the community health centre will form the first phase of development and should be operational in 2018. It is understood that the North Tottenham DEN will not be delivered by 2018 and there is a requirement therefore that the first phase of the Development will need its own energy source. The application proposes that these uses will be served by an energy centre to serve all the buildings in this phase, which in effect will function as a site-wide energy centre for phase one. The energy centre will be located within the stadium building and will be supplied from high efficiency gas-fired boilers.'*

And

*'2.5 If the DEN is not operational in time for the delivery of these remaining elements of the Development, then in order to retain flexibility in terms of the timing, and sequence of these buildings coming forward, the application proposals make provision for each to meet their own energy requirements (probable interim gas boiler solution) pending connection to the proposed DEN. The solution will be developed to allow for a site-wide network to be connected to the DEN once operational.'*

I recommend the following conditions:

## **Diesel Generators:**

- The site shall not operate and no functions or events are to take place until UK Power Network is capable of supplying all electricity as needed during all events, including match days, NFL days, concert days and others. Confirmation and evidence of such electricity demand and supply shall be provided to the LPA from UK Power Network; for approval by the LPA and before the site can operate.
- Generators shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing as necessary to meet that purpose and shall not be used at any other time. At all times the generators shall be operated to minimise noise impacts and emissions of air pollutants and a log of operational hours shall be maintained and be available for inspection by the Local Planning Authority.
- The emergency back-up diesel generators installed for use on the site shall comply with the EU Stage V Emission Standards for Generator Set Engines. Evidence of compliance shall be provided to the LPA for approval prior to installation.
- The diesel generators shall run on ultra low sulphur diesel (ULSD) meeting the fuel specification within EN590:2004.
- Unless otherwise agreed in writing by the Local planning authority all combustion flues must terminate at least 1 m above the highest roof in the development in order to ensure maximum dispersion of pollutants.

## **Combustion and Energy Plant:**

- Prior to installation, details of the Ultra Low NOx boilers for space heating and domestic hot water should be forwarded to the Local Planning Authority. The boilers to be provided for space heating and domestic hot water shall have dry NOx emissions not exceeding 20 mg/kWh.

*Reason: To protect local air quality.*

- Prior to installation details of all the chimney heights calculations, diameters and locations (5No. boilers and 3No. generators) will be required to be submitted for approval by the LPA prior to construction.

*Reason: To protect local air quality and ensure effective dispersal of emissions.*

- Prior to commencement of the development, details of the CHP must be submitted to evidence that the unit to be installed complies with the emissions standards as set out in the GLA SPG Sustainable Design and Construction for Band B. A CHP Information form must be submitted to and approved by the LPA.

*Reason: To Comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction.*

## **Contaminated land: (CON1 & CON2)**

### **CON1:**

- Before development commences other than for investigative work:
  - a) A desktop study shall be carried out which shall include the identification of previous uses, potential contaminants that might be expected, given those uses, and other relevant information. Using this information, a diagrammatical representation (Conceptual Model) for the site of all potential contaminant sources, pathways and receptors shall be produced. The desktop study and Conceptual Model shall be submitted to the Local Planning Authority. If the desktop study and

Conceptual Model indicate no risk of harm, development shall not commence until approved in writing by the Local Planning Authority.

- b) If the desktop study and Conceptual Model indicate any risk of harm, a site investigation shall be designed for the site using information obtained from the desktop study and Conceptual Model. This shall be submitted to, and approved in writing by the Local Planning Authority prior to that investigation being carried out on site. The investigation must be comprehensive enough to enable:-
- a risk assessment to be undertaken,
  - refinement of the Conceptual Model, and
  - the development of a Method Statement detailing the remediation requirements.

The risk assessment and refined Conceptual Model shall be submitted, along with the site investigation report, to the Local Planning Authority.

- c) If the risk assessment and refined Conceptual Model indicate any risk of harm, a Method Statement detailing the remediation requirements, using the information obtained from the site investigation, and also detailing any post remedial monitoring shall be submitted to, and approved in writing by, the Local Planning Authority prior to that remediation being carried out on site.

**And CON2 :**

- Where remediation of contamination on the site is required completion of the remediation detailed in the method statement shall be carried out and a report that provides verification that the required works have been carried out, shall be submitted to, and approved in writing by the Local Planning Authority before the development is occupied.

*Reason: To ensure the development can be implemented and occupied with adequate regard for environmental and public safety.*

**Management and Control of Dust:**

- No works shall be carried out on the site until a detailed Air Quality and Dust Management Plan (AQDMP), detailing the management of demolition and construction dust, has been submitted and approved by the LPA. The plan shall be in accordance with the GLA SPG Dust and Emissions Control and shall also include a Dust Risk Assessment.

*Reason: To Comply with Policy 7.14 of the London Plan*

- Prior to the commencement of any works the site or Contractor Company is to register with the Considerate Constructors Scheme. Proof of registration must be sent to the LPA.

*Reason: To Comply with Policy 7.14 of the London Plan*

- No works shall commence on the site until all plant and machinery to be used at the demolition and construction phases have been submitted to, and approved in writing by, the Local Planning Authority. Evidence is required to meet Stage IIIA of EU Directive 97/68/ EC for both NOx and PM. No works shall be carried out on site until all Non-Road Mobile Machinery (NRMM) and plant to be used on the site of net power between 37kW and 560 kW has been registered at <http://nrmm.london/>. Proof of registration must be submitted to the Local Planning Authority prior to the commencement of any works on site.

*Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.*

- An inventory of all NRMM must be kept on site during the course of the demolitions, site preparation and construction phases. All machinery should be regularly serviced and

service logs kept on site for inspection. Records should be kept on site which details proof of emission limits for all equipment. This documentation should be made available to local authority officers as required until development completion.

*Reason: To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ.*

**As an informative:**

Prior to demolition of existing buildings, an asbestos survey should be carried out to identify the location and type of asbestos containing materials. Any asbestos containing materials must be removed and disposed of in accordance with the correct procedure prior to any demolition or construction works carried out.

Yours sincerely

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