

## MUNICIPAL YEAR 2010/2011 REPORT NO. 62

### MEETING TITLE AND DATE:

Planning Committee

31<sup>st</sup> August 2010

### REPORT OF:

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(Planning and Environmental Protection)

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SUPP AGENDA – PART 1	ITEM: 1
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### SUBJECT:

Consultation on Proposed  
Northumberland Development Project  
(involving redevelopment of  
Tottenham Hotspur Football Club)

### 1. Summary

- 1.1 This report sets out the current position in the light of officers on going discussions regarding the proposed Northumberland Development Project which involves the redevelopment of Tottenham Hotspurs' existing White Hart Lane ground.
- 1.2 The application is to be considered by Haringey Council at a meeting of their Planning Committee on 13<sup>th</sup> September. The reports therefore sets out the basis of our proposed response and the nature of the requested s106 obligations to address the identified concerns.

### 2. Recommendations

- 2.1 That the Head of Development Management be authorised to convey to Haringey Council that this Council raises no objection in principle to the proposed development subject to the satisfactory resolution of the matters outlined in this report and the entering into a s106 agreement to ensure the necessary mitigation identified in the report.

### 3. Background

- 3.1 An application has been submitted to Haringey Council by Tottenham Hotspurs Football Club in respect of the Northumberland Development Project: the main element of which involves the redevelopment of the existing football ground.

- 3.2 As part of the consideration of this planning application, this Council has been consulted by Haringey as the adjoining Borough and invited to submit comments on the proposals which will be taken into consideration part of the assessment of the application.
- 3.3 The application site, which extends to approximately 11.5 hectares (28.5 acres), is approximately 300 metres to the south of the boundary with the Borough; Angel Edmonton (district centre) and the A406 North Circular Road lie beyond. The current stadium is generally between 22-24m high, which is broadly equivalent to 7-8 residential storeys. The stadium has a spectator capacity of 36,237.
- 3.4 We have been advised that Haringey are reporting this application to their Planning Committee on 13<sup>th</sup> September 2010

#### **4.0 Proposal**

4.1 The application proposes:

- i) a football stadium with a capacity of 56,250
- ii) a piazza providing a civic space;
- iii) a new Club Museum (570 sq.m) and Club Shop (3610 sq.m);
- iv) a 150 bed hotel (13,335sq.m) with a maximum height of 41 metres. 40 car parking spaces are proposed;
- v) office accommodation (8,517 sq.m);
- vi) 200 new homes including 50% affordable housing and a tenure split of 70/30 (social rented/intermediate). The indicative mix is 28% 1 be, 28% 2 bed, 24.5% 3 bed and 19.5% 4 bed. The residential would be served by 121 parking spaces together with cycle parking;
- viii) a retail food store (22,009 sq.m) with 401 space car park

#### **5.0 Assessment**

5.1 There is clearly potential for the proposed development to give rise to a variety of effects which could have adverse consequences for this Borough. These are assessed here starting with the key effect: that of traffic generation.

##### Highway / Traffic Generation

5.2 There is a vast amount of information supporting the planning application. As outlined earlier in the Committee report, the scheme involves more than the expansion of the stadium: the new retail floor space in particular has its own traffic implications and its own section of the Transport Assessment. There has been so much information to consider such that

TfL, Haringey and Enfield have all engaged transportation consultants to advise on this documentation. This Council commissioned Colin Buchanan (CB) to assist.

- 5.3 There are a number of concerns relating to the overall Transport Assessment (TA). Concerns were raised about the TA that supported the original application and the revised scheme has not materially changed the traffic and transportation implications. Thus, most of the issues identified by CB and raised with THFC remain with the new TA. The Council's concerns very much reflect the issues that both TfL and LBH have already made (along with many more) to THFC and thus all three authorities would seek these matters to be addressed before the application is determined.
- 5.4 The concern is that without the TA adequately answering the issues, if the application is determined now then it cannot be assured that LBE's s106 requirements will fully mitigate the complete range of impacts if these are underplayed or inadequately assessed within the TA. In particular, there are a number of assumptions made in the TA, related to modal split in particular, which if are not borne out then could have adverse impacts within the borough.
- 5.5 THFC's consultant worked extensively on Arsenal FC's new Emirates stadium and draws heavily on that experience. As valuable as that is the issue is whether their fan base and its geographical distribution, road access, public transport services/modal split, parking control regime/local parking facilities, etc in Islington is transferable or useable to accurately reflect what may happen with future travel patterns to and from White Hart Lane?

#### THFC Approach

- 5.6 Nevertheless THFC have been striving hard, and continue to do so further, with encouraging fans to use public transport through, for example:
- Joint rail/football season tickets;
  - Web-site travel information;
  - Exploring linking Oyster cards to club membership smartcards; and
  - Working with the Train Operating Companies to enhance rail services (which the TOC's see as commercially attractive).
- 5.7 The Club is developing further initiatives to ease the travel impact through:
- Promoting station improvements;
  - Enhanced bus services & minimising their match day diversion routes;
  - Promoting greater use of Tottenham Hale station;
  - Developing coach services;

- Offering future ticket opportunities to more local fans first; and
- Launching events after matches to retain fans at the stadium for much longer, to smooth out passenger demand.

5.8 However our Consultant raised a number of concerns in its initial review:

“The additional assessments and information that will be required to address the outstanding concerns of CB, and therefore LBE, are outlined below:

- *An assessment of the potential car parking problems at rail stations within Enfield, particularly relating to park and ride;*
- *An assessment of the effects of the increased pedestrian flow in the strategic pedestrian network;*
- *Additional information providing clarification as to what the existing average car occupancy is, established from the questionnaire surveys, and how this relates to the proposed average occupancy;*
- *An assessment of the impact or effect the proposed CPZ could potentially have on the areas surrounding it, particularly in relation to displacement impact and increased traffic movements within residential areas not currently affected by match day traffic;*
- *Clarification of key transport and land use issues relating to both the Emirates and White Hart Lane, other than their proximity;*
- *Provision of an assessment of the impact on the strategic road network within Enfield, notably the A406 North Circular/Fore Street junction which will be subject to significant increases in construction traffic during the construction phase;*
- *Clarification as to the collation between the spectator forecasts and the derivation of trip forecasts adopted within Chapter 9 of the TA;*
- *Further justification of the modal split and the reduction in rail and bus modal share. This relates to capacity concerns on the train services running through London Borough of Enfield, which may subsequently need to be addressed;*
- *Confirmation that the submitted Travel Plans are now acceptable to TfL;*

5.9 Whilst it is accepted that the applicant may feel that they have already addressed the issues raised by TfL, as these same issues and concerns have subsequently been raised by CB following their review of the submitted TA, it is clear that the TA doesn't adequately assess the impact on the wider area.”

- 5.10 The dialogue with THFC has continued and subsequent final observations by CB are attached as Appendix A. It is understood that TfL and LBH still have many issues with the TA.

#### Summary of Transportation Issues Affecting LB Enfield

- 5.11 The additional thousands of fans that will go to the new stadium (and associated activities) will undoubtedly impact Enfield, which could affect the borough in a number of ways (including impacting on non-stadium related trips):
- Traffic congestion;
  - Traffic impact;
  - Parking on street – both in Edmonton and possibly at remoter ‘park & ride’ stations in the borough;
  - Overloaded public transport (both at stations and on services);
  - Delayed buses; and
  - Pedestrian safety.
- 5.12 In particular CB confirms the following as the most pressing unanswered concerns are:
- i) The impact of Park and Ride at stations within Enfield;
  - ii) That the adopted modal split is realistically achievable?
  - iii) Uncertainty as to the validity and accuracy of the assessments and subsequent conclusions. As a result, it is felt that the impact on public transport and the highway network may have been underestimated resulting in a requirement for additional assessment and improvements;
  - iv) The level of trips predicted to travel by bus particularly from the north may be underestimated and as such, it is anticipated that the proposed development would have an impact on capacity of the bus routes to and from Enfield. However, this has not been taken into consideration within the revised TA. Furthermore, capacity issues on Enfield bus services south of the stadium will also impact on existing Enfield bus passengers;
  - v) That TfL has no confidence in the predicted modal share and as a result none of the bus improvement proposals set out in the TA have been agreed;
  - vi) Whilst minimal impacts on Silver Street and Angel Road can be conceded due to their proximity to the stadium, existing users will still be affected by the increase in rail passengers on the services through Enfield. Furthermore, it is still considered that the primary stations to the north of the Borough, such as Turkey Street and Enfield Town, would also be affected by increased rail travel;
  - vii) There does not appear to be any capacity analysis provided within the revised TA of the impact of the proposed development on the

A406/Fore Street junction, despite this being raised as a concern for LBE and TfL.

- 5.13 In order to overcome the concerns, s106 obligations need to be sought to either mitigate the impact – e.g. the introduction of a match-day Controlled Parking Zone (CPZ) north from the borough boundary with L. B. Haringey into Edmonton, or ensure various undertakings are delivered to achieve the improvements sought. These should be secured at no cost to this Council, both in terms of short and long term or capital/revenue costs.
- 5.14 The expanded stadium will undoubtedly have a large impact into the Borough. The overall strategy to address the transportation issues is supported. Some areas of concern remain unanswered and certain assumptions or predictions may be optimistic and LBH could be asked to require the applicant to address these outstanding issues. In any event TfL and LB Haringey are likely to be seeking further information.
- 5.15 Notwithstanding that some issues remain unresolved within the TA (in our view) there are some areas where certainty cannot be assured. For example the match-day CPZ will deter traffic and parking within parts of the borough. However it is difficult to precisely gauge if some fans will travel by car and park on street, deciding it may still be cheaper to pay the parking penalty charge notice rather than travel by public transport (particularly from a distance). In other instances fans may drive into, say, Edmonton, and find ‘temporary’ parking arrangements – school playgrounds, yards, unused office car parks etc. Both examples would, to some degree, undermine the strategy of traffic reduction and the promotion of public transport.
- 5.16 If the s106 obligations are secured as identified in Appendix B, then most of the major issues will have been addressed as far as this Council is concerned, on the assumption that other identified public transport enhancements are secured by TfL and LBH.
- 5.17 Should the application be determined notwithstanding that there are unresolved issues remaining with the TA, then from the perspective of this Borough, there are a number of matters which demonstrably require mitigation and which should be subject to s106 obligations. These are set down in Appendix B but the key points are:
1. Travel Plan/Travel Assumptions Delivered
  2. CPZ
  3. Footway Works
  4. Signing
  5. Construction Access/Management
  6. Bus Stops

7. Ticket Priority

8. Cycling

5.18 Education

5.19 There is significant pressure for primary school places in Edmonton. As already identified, the proposed development is located within 300 metres of the Borough's boundary. It is also accepted that the Borough is a net importer of children from adjoining Boroughs and thus, the proposed 200 houses of which at least 44 will be suitable families and likely to increase pressure on the demand for limited school places.

5.20 Consequently, it is considered that the residential development will place further pressure on schools within the Borough and in order to offset this pressure, a financial contribution should be sought towards education facilities.

5.21 Based on a 50% private / 50% affordable split of the proposed mix of the 200 properties, and using the standard formula and current DfE capital cost multipliers, the following S106 contribution is produced (the numbers of places represent the average potential annual pupil product from the development and are rounded to the nearest whole number):

Primary sector

25 places @ £13,115 per place = £327,875

Secondary sector

7 places @ £19,762 per place = £138,334

TOTAL = £466,209

5.22 However, it is acknowledged this Borough would not receive the entire child product arising from this development. To evidence the contribution actually required, Education have checked on the current percentages of pupils in our schools in this part of Enfield that come from Haringey. The A406 unsurprisingly seems to be a barrier to pupil movement as the numbers in schools immediately to the north are insignificant. However, at those schools to the south where significant numbers of Haringey pupils are admitted, the average to the nearest whole number is 23% (these schools are Wilbury, St. John & St. James', Oakthorpe, Bowes, Tottenham Infants and St. Michael-at-Bowes Junior). 23% of the above sum is £107,228.

5.23 Retail Impact

The other key issue relates to the potential effect of the proposed retail store on the Angel town centre situated in our Borough to the north of the

application site. This centre extends from the Borough boundary northwards to the line of the A406. Consequently, it is this centre which is most likely to be affected by the additional retail development especially if the potential of the vacated retail unit is realised by another retail operator but we are also mindful of the potential to negatively impact upon the ongoing regeneration of Edmonton Green.

- 5.24 In terms of the retail analysis that has been submitted in support of this application, however, the figures show that demand exists within the catchment area to support the development without significantly harming the viability of our existing centres. This approach would also be supported by the evidence on the capacity of additional food retail serving the Borough which informed the Core Strategy. Nevertheless, in the current economic climate, even marginal changes in trading patterns can have serious implications for the viability of individual operators. As a result, it is considered that a contribution of £30,000 towards town centre management / street scene improvement should be sought.

5.25 Environmental Impact

The proposed stadium with a capacity of 56,250 will result in an additional 20,000 (approx) supporters above existing match day levels. Before and after games therefore, it is likely there will be significantly more people passing through the Edmonton area and using the facilities such as shops, cafes and hot food takeaways. A consequence of this increase therefore, there is likely to be an increase in littering and anti social behaviour. Colleagues in Cleansing have confirmed that match days to have a significant impact on litter especially around Fore Street, the rail stations and the side streets that attract parking. The cost of dealing with this impact is estimated at £23,500 per season and this cost should be met by the Applicant through a S106 agreement.

- 5.26 With regard to the potential anti social behaviour issues, its considered that the introduction of CCTV cameras in the Angel are would assist in addressing this issue and Community Safety have advised that a contribution of £10K per camera (or 14K for a two cameras on one pole) together with £15K for the necessary supporting radio network is required. The total number of cameras to be funded is still under discussion.

5.27 Visual Impact

The development involves a number of significant buildings, the most significant of which will be the stadium itself. This will have a maximum height of 41 metres and will be about 230 metres long (north / south axis) and 200 metres wide (east / west axis). Although the stadium would be



visible from within the Borough, the design is considered to be of a high architectural standard and provides significant visual character to the area.

5.28 In addition to the stadium, the most visible building would be the residential and hotel blocks. The housing would rise to a maximum of 36 metres above ground level whilst the hotel would rise to 41 metres. With the attainment of a high quality of architectural design, although visible from the Borough, the proposals are not unacceptable.

5.29 No objection is therefore, raised to these elements.

### 5.30 Regeneration

It is acknowledged that the development represents a significant redevelopment opportunity and could have benefits for residents of the Borough. The applicant indicates that the development would lead to 370 FTE permanent jobs, up to 340 FTE construction jobs and up to 1000 match day jobs. To maximise the direct benefits for residents of the Borough, it is recommended that Haringey are requested to ensure the Applicant commits to the Construction Web and Jobs Net initiatives which the Council operate in conjunction with Haringey

5.31 The proximity to the Borough boundary and therefore, this Council's own proposals for Central Leaside "Meridian Water" has also been assessed. Nevertheless, it is considered the proposals are not in conflict and in fact the improvements to transport infrastructure in the area could have some long terms benefits.

## 6.0 **Conclusion**

6.1 It is recognised that this development will bring about significant regeneration benefits with a corollary being the potential benefits for residents of Enfield. Thus, no objection is raised to the general principles of the development. Nevertheless, at this stage, there remain a number of concerns especially around the transport assessment which have been identified in the report. In order to mitigate these concerns, it is considered necessary that a s106 agreement is entered into to secure the necessary mitigation and contributions to address the effects.

6.2 The s106 obligation and mitigation as set out in the report, are considered sufficient to ensure the Borough's residents and environment are not adversely prejudiced and although it is acknowledged that there is still some element needing to be clarified, it is requested that Members confirm the basis approach enabling officers to finalise discussion in line with the issues identified in the report and submit comments prior to the Haringey Planning Committee meeting.

## APPENDIX A

### 1 Introduction

1.1 On the 6th July 2010, CB provided LB Enfield with a Technical Note which set out the main issues and concerns which arose from a review of the revised planning application submitted in June 2010, and how this related to the primary issues identified from the original planning application.

1.2 The overall conclusion of the July Technical Note was that although the revised application went some way to addressing many of the comments and issues, there remained uncertainty with regards a number of the key elements. As a result, the Technical Note advised that prior to confirming support for the redevelopment scheme that, LBE seek the provision of capacity analysis of the A406 North Circular/Fore Street junction and confirmation of agreement in relation to funding for bus improvements.

1.3 A response from Tim Spencer of the development team was received on the 23rd July 2010. In general it is considered that whilst each of the main areas of concern are mentioned, the response does not provide sufficient additional information to address the concerns raised, nor does it provide the capacity analysis requested. Instead the response states:

‘...the changes to car parking patterns are likely to be difficult to precisely anticipate at the ‘micro’ level, will be increasingly dispersed and at a much lower density (per acre). Although the changes can be clearly rationalised in a wider area context (as happened with the Emirates Stadium) they can’t be translated into specific future traffic forecasts such as for the Fore Street/North Circular Road junction. However, this junction is part of the non-match day assessment related to both construction and post-development traffic flows and will be a candidate for some form of mitigation, if needs be.’

1.4 CB do not accept this and strongly believe that future highway capacity can be assessed through robust analysis and to some extent, this apparent unwillingness to undertake or provide traffic modelling of the strategic highway network brings into doubt the robustness and appropriateness of the conclusions of the Transport Assessment. Furthermore, no mitigation measures are suggested for this junction which brings into doubt whether mitigation has been considered or will actually be provided as indicated.

## 2 GLA Stage 1 Response

2.1 Throughout the TA review process, CB has also reviewed TfL's comments and position in relation to the planning application as many of the concerns raised by CB have also been raised by TfL.

2.2 A copy of the latest Stage 1 response to the revised application has been received from TfL and whilst it is acknowledged and understood that discussions between TfL and the applicant are on-going, the matters still considered outstanding are of some relevance to LBE's position. In particular Paragraph 106 of the GLA Report which states:

'The developer has put forward very ambitious mode shift targets. TfL considers that they can only be achieved if the developer is committed to substantial obligations to deliver the necessary mitigation. The conclusions in the TA alone do not give sufficient confidence that these mode shifts can be achieved, however TfL is committed to the on-going discussions with the developer and borough to identify the necessary transport improvements that will be key to securing this significant regeneration opportunity.'

2.3 Other key comments of note within the GLA Response that may have an influence on the position and stance of LBE when considering their support are set out below:

- '...the transport strategy is highly dependent on its [further extended CPZ] implementation... TfL doubts about the effectiveness of the CPZ minimising car use and influencing modal share...' (Paragraph 54);
- 'TfL is unable to compare the current and future scenarios in relation to waiting times at key transport hubs. Without this information, TfL cannot agree that the development will have a nil detriment on the highway.' (Paragraph 57);
- 'The use of financial mechanisms, such as targets linked to mode split, should be considered if retention levels are not achieved. The failure to meet retention targets will result in longer queues at public transport hubs and with the effect that car based travel will be more attractive.' (Paragraph 59);
- 'The assessment does not provide sufficient information on existing vehicular conditions for both the match day and non-match day scenarios. TfL has worked with the borough and the developer in order to resolve this matter however, there are still fundamental

concerns. TfL has requested further information and until this matter is resolved, impact on the TLRN cannot be verified and subsequently accepted.’ (Paragraph 80);

- ‘TfL seeks the provision of a Delivery and Servicing Plan (DSP)...’ (Paragraph 95);
- ‘Much has been made of the comparison with the Emirates Stadium; however this ignores the attraction to drive to Tottenham with excellent links to the main road network.’ (Paragraph 105).

2.4 From the above comments it is clear that there is a considerable amount of outstanding work that still needs to be submitted to and reviewed by TfL before the application will be approved.

2.5 It is also clear that, contrary to what CB/LBE has been told by the applicant, very little has been approved by and agreed with TfL in terms of mitigation and planning obligations.

### 3 Conclusion

3.1 In line with the conclusions of TfL, there is insufficient evidence provided within the TA to being to conclude that the proposed development would not have an unacceptable impact on the London Borough of Enfield and as such, the mitigation measures previously advised should continue to be sought.

3.2 The response received from Tim Spencer, together with the TfL comments outlined above, have brought to the fore concerns about the level of mitigation and matters that the applicant intends to address simply through conditions. Whilst the commitment to provide monies through the S106 Agreement process is welcomed, there is some suggestion that the implementation of the measures will be subject to monitoring post-application and as such there is no guarantee that the conditions can/will be enforced and as such that the mitigation measures would be implemented within a reasonable timescale, or at all.

3.3 Therefore, it is our firm advice that LBE seek agreement that all the mitigation measures and their associated costs are secured as a fixed unconditional sum. At the very least CB would suggest that LBE seek a bonded sum against each particular measure/issue be secured, again with payment received, not as a condition that will be sorted out in due course depending on additional work or surveys.

## **APPENDIX B**

### **S106 Mitigation Measures within Enfield**

#### **1. Travel Plan/Travel Assumptions Delivered**

(i.e. to deliver the 'promised' improvements within the TA)

TP to also to cover hotel/offices/retail/residential,  
CPZ details – publicity etc,  
Public Transport Info + all updates/timetable changes etc,  
Info to season ticket holders,  
Staff travel to also be covered.  
Bus Service Improvements - routes 149,259, 349.  
Station Improvements, including with LB Enfield.

#### **2. CPZ**

An obligation to underwrite all the LBE costs in establishing & running the match-day CPZ in Edmonton:

##### Capital costs of introducing

- Design,
- Consultation/re-consultation,
- All legal/TMO costs,
- Statutory advertisements,
- E/o all signage/markings.

##### Revenue costs

- On-going costs of Issuing residents/other permits & renewals thereof,
- Incidental scheme amendments as they arise
- Replacement/renewal of signs, lining, etc as they occur

##### Other

Mechanism for updating match day signs to indicate that the CPZ is in force,

A mechanism to monitor/revise the CPZ boundary as needs/revise circumstances.

A mechanism to address any further CPZ required to control 'park & ride' at stations within Enfield.

#### **3. Footway Works**

Funding towards footway enhancements to try to address capacity concerns over walking routes through LBE close to the Borough boundary & in particular to & from local stations & bus stops. Such mitigation will include footway de-cluttering, additional crossing facilities, & local widening.

#### **4. Signing**

To ensure that all direction signs are provided/upgraded as appropriate for vehicles & pedestrians - stadium, coach parking, stations, cycle routes/parking.

#### **5. Construction Access/Management**

To ensure agreement over adequate routes/timing/monitoring/control etc of large vehicles/deliveries. Compliance bond etc.

#### **6. Bus Stops**

Where these will serve the stadium, within LBE, to ensure that these are best sited/improved, & access enhanced as appropriate.

#### **7. Ticket Priority**

THFC have been suggesting that it should help to return to its original local fan base, & one way to achieve this is to give more local supporters priority over the release of non-season tickets; & LBE feel that this priority should be to include the N.9 & N.18 areas, to minimise longer distance trips.

#### **8. Cycling**

Route improvements/cycle way provision, to feed towards Tottenham.