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Ciara Whelehan
Team Leader Planning Policy
London Borough of Haringey
6th Floor, River Park House
225 High Road
Wood Green
London
N22 8HQ

Richard Serra
E: rserra@savills.com
DL: +44 (0) 113 220 1271
F: +44 (0) 113 244 0104

Ground Floor
City Point
29 King Street
Leeds LS1 2HL
T: +44 (0) 113 244 0100
savills.com

By post and email

Dear Madam

**Haringey Local Plan: Strategic Policies
Consultation on the National Planning Policy Framework
Comments on behalf of Tottenham Hotspur Football Club**

We are instructed by Tottenham Hotspur Football Club ("THFC") to respond to the Council's additional consultation exercise on the draft Local Plan: Strategic Priorities (formerly the Core Strategy). The consultation is focussed on matters raised by the recent publication of the National Planning Policy Framework ("NPPF"), and as a result of this we have confined our comments specifically to this document. To this extent, the comments below should still be read in conjunction with THFC's previous representations on the Core Strategy/Local Plan.

Background

Planning permission (HGY/2010/1000) and related consents for the Northumberland Development Project ("NDP") were granted on 20 September 2011. NDP is described in more detail in our letter of 21 June 2010, but principally comprises the redevelopment of the Club's White Hart Land Stadium to provide a new 56,250 capacity football stadium; a new foodstore and 200 new homes.

Since the granting of NDP, THFC have undertaken a review of the overall scheme and on 29 March 2012 were granted planning permission for revised proposals for development to the north and south of the proposed stadium (HGY/2011/2350 and HGY/2011/2351). The changes relate to the foodstore and its associated uses, and the residential element of the proposals (raising the total dwellings from 200 to 285).

The significant catalytic effects of this development opportunity are identified both in the UDP and the Submission Core Strategy. There is a package of measures within the planning obligations (covering issues ranging from employment and skills; inward investment; and support and regeneration masterplanning) to ensure that the potential regeneration benefits of the scheme are maximised.

Overall Comments

The publication of the NPPF in March 2012 heralds a fundamental shift from the Government on how Local Planning Authorities should now undertake plan-making and consider development proposals. It condenses previous Government planning policy (primarily in the form of Planning Policy Statements and Planning Policy Guidance Notes) to a single concise document. The 'golden thread' running through the document is a '*Presumption in Favour of Sustainable Development*' whereby Local Planning Authorities should consider wider economic, social and environmental roles when formulating Local Plans and making planning decisions.



Against this background THFC are encouraged to see that the Council have proposed to insert a new policy into the Local Plan (*Strategic Policy SP (NPPF)*) to acknowledge this step-change. The Club wholeheartedly supports this and notes that this is consistent with Planning Inspectorate guidance for Local Planning Authorities on how to best incorporate the fundamental principles of the NPPF into emerging Local Plans.

It is against this background that THFC provide detailed comments relating to the specific sections of the NPPF below. The comments have been confined to those sections of the NPPF that the Club believes necessitate specific alterations to the draft Local Plan.

Building a strong, competitive economy

In order to assist development in the current difficult economic conditions, Paragraph 22 of the NPPF provides flexibility for Local Planning Authorities to avoid the long term protection of sites allocated for employment, where there is no reasonable prospect of the site being used for that purpose. This policy allows other uses (particularly housing) to emerge on such sites.

The supporting text around the corresponding policy within the Council's draft Local Plan, *Strategic Policy 8 (SP8)*, acknowledges that the Council will monitor and release employment land for other uses where sites are no longer seen as suitable (para 5.1.4 in the Submission Draft). Whilst THFC regards this as broadly complying with the NPPF, it also believes that to ensure that the benefits of this measure are fully maximised, and that the potential for new urban regeneration schemes are fully realised, this measure should be made more explicit and inserted into SP8 itself. That way the policy itself will become more balanced by encouraging new employment proposals, but also building in sufficient flexibility to ensure that the policy does not potentially hinder other development options in the future.

Delivering a wide choice of high quality homes

THFC agrees with the Council's analysis that the policies of the draft Local Plan that relate to housing are broadly consistent with the NPPF. The Club however notes and supports the insertion of the following text into after Paragraph 3.2.4 of the draft Local Plan:

'The Council's Housing Trajectory shows a demonstrable housing land supply and is capable of bringing forward additional sites from future years to meet the requirements of an additional 5% buffer, as set out in the NPPF, to ensure future housing needs are met. In doing this, the Council will seek to enable the development of 861 new houses per year; or 5% above the mayor's target of 820 units per year.'

This takes into account the need for Local Planning Authorities to maintain a degree of flexibility when considering future housing land supply.

Meeting the challenge of climate change, flooding and coastal change

On the whole the Club agrees and supports the changes to the draft Local Plan in relation to the climate change measures outlined in the NPPF, however where existing draft Local Plan policy states that:

"All new developments will be required, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20% from on site renewable energy regeneration which can include connections to local sources of decentralised renewable energy."

This should be amended to state:

*"All new developments will be required, where viable **and suitable**, to achieve a reduction in predicted carbon dioxide emissions of 20% from on site renewable energy regeneration which can include connections to local sources of decentralised renewable energy."*

This better reflects Paragraph 96 of the NPPF. Paragraph 96 also states that Local Planning Authorities should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption, and whilst THFC notes that the Council believes this is addressed through the application of the Mayor's energy hierarchy, some reference to this should also be put into the draft Local Plan so as to ensure that the policies relating to climate change can fully address the NPPF in their own right.

Conserving and enhancing the historic environment

Whilst THFC agrees that the policies of the NPPF regarding the historic built environment largely reflect the Government's previous policies outlined in PPS 5, it is the Club's view that the NPPF attempts to apply the policies more flexibly than its predecessor; namely in relation to proportionality. In particular Paragraph 128 which states:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

It is therefore the Club's view that this approach should be incorporated into *Strategic Policy 12 (SP12)* of the draft Local Plan.

Reference should also be made to Paragraph 133 of the NPPF in the draft Local Plan which outlines where, in certain circumstances, the loss of heritage assets may be permissible

We trust these comments will be taken into account when considering the proposed changes to the draft Local Plan. Please do not hesitate to contact Richard Serra or Christopher Martin in this office if you require any further information or clarification.

Yours faithfully



Savills (on behalf of Tottenham Hotspur Football Club)