

12 October 2012



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

**For the attention of Ciara Whelehan
Team Leader Planning Policy**

By post and email

Dear Madam

**Haringey Local Plan: Strategic Policies Consultation on the Inspector's Main Modifications
Representations by Tottenham Hotspur Football Club**

We are responding on behalf of Tottenham Hotspur Football Club ("THFC") to the Council's invitation for the submission of comments on the indicative modifications put forward by the Inspector in his letter of 22 August 2012. We also note the content of his letter of 24 August 2012, which summaries his reasoning for Modification 28. THFC's comments relate solely to Modification 28 but should be read in conjunction with all comments previously submitted by THFC on the Haringey Core Strategy/Local Plan.

THFC remains a key stakeholder in the regeneration of Tottenham not least with its £430m investment in the Northumberland Development Project (the "NDP"). The NDP will provide a replacement stadium for THFC with an enlarged capacity of 56,250. It will also provide new headquarter offices for the charitable Tottenham Hotspur Foundation; a new foodstore; up to 285 new homes; education and health facilities; and significant amounts of new public open space.

The first phase of the NDP commenced on 8 October 2012 with a 14 month build period and the creation of 430 permanent FTE jobs¹ when the foodstore opens. The scheme overall will create over 800 FTE jobs and will attract over a million visitors to the area each year.

The importance of the NDP and its potential catalytic regeneration effects are now well-established both within the development plan² and emerging policy³. THFC continues to work in partnership with the Council and with the Mayor of London to ensure that the regeneration benefits of the NDP are captured.

The thrust of THFC's previous representations has been to secure a supportive and flexible planning policy context for the area around the NDP, which is likely to be subject to significant change over the next few years. To this extent, THFC is supportive of the strategic and local planning approach being adopted by both the Mayor of London and the Council.

The Upper Lea Valley Opportunity Area designation of the NDP site and surrounding areas in the London Plan signalled that the area would be potentially subject to significant change several years before the August 2011 riots (which began in Tottenham) placed an acute sense of urgency on the need to secure regeneration in the area.

The 'Tottenham Taskforce' was assembled in the aftermath of the August 2011 riots and comprises:

¹ Page 28, Chapter 12, NDP Environmental Statement (May 2010)

² The London Plan (consolidated with alterations since 2004) (July 2011) and the Haringey Unitary Development Plan (July 2006)

³ The Haringey Submitted Local Plan (March 2011) and the Upper Lea Valley Opportunity Area Planning Framework, Consultation Draft (November 2011)

- Cllr Alan Strickland, Cabinet Member for Regeneration and Chair of the Tottenham Taskforce;
- Cllr Claire Kober, Leader of Haringey Council;
- Cllr Bernice Vanier, Cabinet Member for Communities;
- Sir Stuart Lipton, the Mayor of London's Tottenham Champion;
- David Lammy, MP for Tottenham;
- Fiona Fletcher-Smith, Executive Director for Development and Environment at the Greater London Authority;
- Paul Head, Principal of the College of Haringey, Enfield and North East London (CHENEL);
- Andrew Campling, Chair of Haringey Business Board;
- Paul Finch, Chair of the Design Council/Commission for Architecture and the Built Environment;
- Tony Travers, London School of Economics;
- Brian Boylan, Chairman of Wolff Olins; and
- Matthew Girt, Head of Strategic Development at the Diocese of London.

The purpose of the Taskforce is to accelerate the pace of change of Tottenham's transformation and to match words with action. The Tottenham Taskforce commissioned an ambitious programme of change called "A Plan for Tottenham". The Plan was officially launched at THFC's White Hart Lane ground on 11 October 2012 and is endorsed by the Permanent Secretary at the Department of Communities and Local Government, Sir Bob Kerslake. The Plan focuses on:

- maximising economic growth, jobs, investment, enterprise and new business in Tottenham;
- bringing forward high quality housing; and
- making Tottenham a successful and attractive place to live and work.

The Plan for Tottenham specifically promotes Northumberland Park as a "leisure destination for North London" in order to create a high quality location for leisure activities, housing and an increased range of employment opportunities.

The Upper Lea Valley Opportunity Area Planning Framework ("ULVOAPF") gives spatial effect to the Mayor of London's strategic policies defines the Northumberland Park Area Action Plan boundary and includes the NDP site and land to the north, east, south and west. It proposes the release of Locally Significant Industrial Location DEA9 (High Road West)⁴, which comprises a site known as 'Brook House' and the Peacock Industrial Estate to the south. A planning application will be submitted imminently on the Brook House site that will seek permission for new homes, a school and other community and employment uses. The majority of buildings on the site have now been demolished.

Equally, if the Peacock Industrial Estate is also to be brought forward for redevelopment in line with both the ULVOAPF and the Plan for Tottenham, it too will require a positive and flexible planning policy basis to support land assembly and redevelopment for a wider range of uses.

The DEA17 site (White Hart Lane, N17) is surrounded by residential uses on three sides and if brought forward for redevelopment (whether whole or in part) could also perform a significant role in the regeneration of the area to the west of the High Road.

This rapid pace of change arises from rather unprecedented circumstances and does not sit comfortably with the slower statutory processes the Council must follow in the adoption of its Local Plan. However, throughout the gestation of the Core Strategy and latterly the Local Plan, THFC recognises that the Council has endeavoured to try and keep the Local Plan current and relevant, whilst ensuring its soundness.

Whilst relying upon its own Employment Study, the Council has for example sought to introduce more flexibility into Policy SP8. Specifically, the Fundamental Changes consulted upon during October and November 2011 proposed the re-designation of several "Locally Significant Industrial Sites" to "Local

⁴ See Fig 9.5, page 153



Employment Areas". Of particular interest to THFC was the re-designation of DEA9 (High Road West, N17) and DEA 17 (White Hart Lane) to a Local Employment Area (Employment Land) status.

These re-designations would at least have recognised the potential for other forms of employment generating uses that would be complementary to the 'B' Class uses. However THFC submitted comments at the time seeking the re-designation of DEA9 and DEA17 to Local Employment Area (Regeneration Area) status in order to provide a more supportive policy context for mixed-use development – one that more accurately reflected the London Plan, the ULVOAPF and emerging site-specific proposals.

The approval of the NDP scheme accepted the loss of DEA8 (N17 Studios) through the operation of saved Policy EMP4. Not only were the majority of occupiers relocated elsewhere within Haringey, but the N17 Studios is being replaced by a scheme that will generate a greater number and wider range of employment opportunities in addition to a raft of other regeneration benefits. Until it is replaced by a corresponding policy in the Development Management Policies DPD in due course, saved Policy EMP4 will continue to operate alongside Policy SP8. Therefore where the criteria in saved Policy EMP4 can be met, the loss of an employment site protected by Policy SP8 can be justified in any event.

The redevelopment of such industrial estates, which very often do not meet the needs of modern industry anyway, need not result in the net loss of employment. Indeed as the NDP has demonstrated, their redevelopment can unlock the potential for greater employment and regeneration opportunities.

The pace and direction of travel for Tottenham and in particular Northumberland Park Ward has been set by the community itself as well as the public bodies charged with regeneration of the area. The Haringey Local Plan must do all it can to support rather than fetter these efforts.

THFC therefore **objects** to Modification 28 and specifically the designation of High Road West, N17 (formerly DEA9) and White Hart Lane, N17 (formerly DEA17) as Locally Significant Industrial Sites, which it sees as a retrograde step in the regeneration of Tottenham. THFC continues to seek their designation instead as Local Employment Areas (Regeneration Area).

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

Savills (on behalf of Tottenham Hotspur Football Club)

cc Marc Dorfman – Haringey Council
Paul Phillips – THFC