

21 June 2010  
LEPL126568

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Dear Sir/Madam

**Haringey Council Local Development Framework  
Core Strategy (Proposed Submission Stage Document)  
Representations by Tottenham Hotspur Football Club**

We are instructed by Tottenham Hotspur Football Club ("THFC") to submit representations on the submission stage document of Haringey's Core Strategy, which forms part of the emerging Local Development Framework (LDF) for the Borough and will help guide development in Haringey for the next 15-20 years.

**(a) Background**

THFC's comments are made against the background of recently submitted revised applications for a stadium-led, mixed-use scheme on the site of the Club's existing White Hart Lane Stadium and surrounding land. The scheme has the working title of the Northumberland Development Project ("NDP").

NDP has chiefly emerged as a result of the operational requirement of the club to have a stadium with a larger capacity and with state of the art facilities that will allow it to continue to compete effectively with the top football clubs in England and the rest of Europe. NDP also reflects the desire of both THFC and the London Borough of Haringey for the club to remain in the local area and provide a catalyst for the regeneration of this part of the High Road. The revised scheme proposes the phased demolition of the existing stadium and surrounding land; the retention and restoration of key historic buildings along the High Road; and the erection of the following:

- a new stadium with a capacity of 56,250;
- up to 200 new homes including family and affordable housing in line with London Plan and Haringey policy;
- Club office facilities;
- replacement Club shop;
- new Club museum and ancillary café;
- 150 bedroom hotel;
- new foodstore; and
- the creation of new high quality public realm to be used for a variety of community uses on non match days.

NDP represents a significant investment opportunity which is not just of importance to the Borough but to Greater London as a whole



**(b) Introduction**

THFC fully supports the overall approach to the Core Strategy in principle, on the basis that Haringey must continue to attract investment in order to assist in the Borough's goal of regenerating its disadvantaged areas and to encourage sustainable patterns of development that will increase the future prosperity and quality of life for all of Haringey's residents. THFC also recognises the need for the Council to have a clear policy framework in place as quickly as possible in order to establish certainty for developers wishing to invest in the Borough.

PPS12 (2008) provides specific guidance relating to Core Strategy documents that have reached 'submission stage' which is that they should clearly be able to demonstrate that they are 'sound'. Soundness is defined as being 'justified' and 'effective'. 'Justified' means the document must be:

- founded on a robust and credible evidence base; and
- the most appropriate strategy when considered against the reasonable alternatives.

'Effective' means that the document must be:

- deliverable;
- flexible; and
- able to be monitored.

From the guidance outlined in PPS12 it is THFC's opinion that the Core Strategy presented for this consultation is fundamentally sound and that its policies are fully justified and effective. For this reason and for avoidance of doubt, any comments made in this letter do not amount to an objection to the Core Strategy, rather they seek clarification and where appropriate non-material minor alterations to the policies proposed.

**(c) Policy Comments**

**(i) Policy SP 1 – Managing Growth**

THFC fully supports this policy as it acknowledges the important role that NDP will play in the regeneration of the Northumberland Park ward and the Borough as a whole.

**(ii) Policy SP 2 – Housing**

THFC agrees and supports the overall thrust of this policy and notes that it is entirely consistent with the Council's existing Housing Supplementary Planning Document, the published London Plan and the emerging Replacement London Plan. However, THFC seeks clarification on the protocol that should be followed in the event that it proves unviable for a development to provide 50% affordable housing in the specified tenure mix or instances where a lower headline amount of affordable housing could be acceptable because of other significant tangible regeneration benefits that a proposal may have. THFC believes this policy needs to be clear under these circumstances.

**(iii) Policy SP 3 – Gypsies and Travellers**

No specific comment.

**(iv) Policy SP 4 – Working Towards a Low Carbon Haringey**

THFC appreciates the importance of having specific policies within the Core Strategy aimed at lowering carbon emissions and for that reason supports this policy in principle. It believes however that the specific targets relating to the Code for Sustainable Homes need greater explanation given that these targets are based on assumptions that the future technology will exist to readily and viably build large numbers of new



homes to these standards. The policy could therefore contain relevant caveats to ensure that new homes can still be developed in a scenario where this technology has not yet been fully developed.

(v) **Policy SP 5 – Water Management and Flooding**

No specific comment.

(vi) **Policy SP 6 – Waste and Recycling**

No specific comment.

(vii) **Policy SP 7 – Transport**

THFC fully supports this policy and believes the investment in transport infrastructure outlined in the first part of this policy provides an important element to the overall future development of the Borough. The Club also agrees with the second part of the policy and notes that NDP is fully consistent with this.

(viii) **Policy SP 8 – Employment**

No specific comment.

(ix) **Policy SP 9 – Improving skills and training to support access to jobs and community cohesion and inclusion**

The Club recognises the importance of offering both training and job opportunities to the local community as part of an overall regeneration strategy for the Borough and intends to offer such opportunities as part of NDP. As a result of this THFC supports this policy in principle.

(x) **Policy SP 10 – Town Centres**

THFC is pleased that the policy text associated with SP 10 includes reference to the substantial retail investment that is to be proposed as part of NDP and endorses this policy which it believes is entirely consistent with central government planning policy contained in PPS4 and the policies of the published London Plan and emerging Replacement London Plan. THFC believes however that the policy could provide even greater certainty for retail investment in the Northumberland Park ward by specifically referencing the retail proposals that form part of NDP within SP 10 itself.

(xi) **Policy SP 11 – Design**

No specific comment.

(xii) **Policy SP 12 – Conservation**

THFC supports this policy and believes that SP 12 is sound and is entirely consistent with the thrust of central government planning policy contained in PPS5. THFC however would argue that the policy could contain even greater clarity by providing additional policy guidance to cater for large-scale regeneration projects that are proposed in or near conservation areas and how the Council will judge any perceived impact on existing heritage with the tangible benefits large scale regeneration projects can bring to the surrounding area.

(xiii) **Policy SP 13 – Open Space and Biodiversity**

THFC acknowledges that open space and biodiversity play an important role in the future development of Haringey and for this reason endorses this policy. THFC however seeks assurances that where reference to the Council's Open Space and Recreational Standards Supplementary Planning Document is made, that it is clear in that document the scope and type of contribution that a developer is expected to make and that it is

consistent with guidance provided by the Greater London Authority and statutory bodies such as Sport England.

**(xiv) Policy SP 14 – Health and Well-Being**

THFC supports this policy in principle and notes that the work of the Club's charity, Tottenham Hotspur Foundation, significantly assists in the health and well-being of young and disabled people within the Borough. NDP proposes a new premises for the Tottenham Hotspur Foundation which will allow the charity to operate even more effectively within Haringey.

**(xv) Policy SP 15 – Culture and Leisure**

THFC is pleased that the Club is acknowledged in SP 15 as a significant cultural and leisure asset within the Borough and fully supports this policy.

**(xvi) Policy SP 16 – Community Infrastructure**

THFC agrees with the overall thrust of this policy but as a matter of clarity would seek assurances that any planning obligations sought pass the three planning obligation tests which following the activation of the Community Infrastructure Levy Regulations in April of this year, are now enshrined in law. These assure that planning obligations are:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

**(xvii) Policy SP 17 – Delivering and Monitoring**

No specific comment.

We trust that the above comments will be considered during the examination stage of the Core Strategy. If you have any queries regarding any of the comments made please do not hesitate to contact either Richard Serra or Peter Dixon at the above office.

Yours faithfully

Savills.

**Savills** (on behalf of Tottenham Hotspur Football Club)

- cc Marc Dorfman – Haringey Council  
Sue Cooke – Haringey Council  
Paul Phillips – THFC  
Tom Dobson – Hunt Dobson Stringer

