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Efthymiou (02-06-11).doc



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Dear Ms Efthymiou

**Haringey Core Strategy Examination in Public  
Focused Consultation on Schedule of Minor Changes**

**Introduction**

We act for Tottenham Hotspur Football Club ("the Club").

Thank you for your email messaged dated 4<sup>th</sup> May 2011 inviting us to comment on the Council's proposed Minor Changes to the Core Strategy and upon the implications of the Government's "Planning for Growth" Written Ministerial Statement.

The Club has an interest in the Core Strategy because it is currently promoting a scheme to redevelop the existing White Hart Lane stadium and adjoining land for a mixed-use scheme anchored by a new stadium.

The potential for a scheme of this kind is referred to in a number of places in the Core Strategy, which also indicates that an Area Action Plan for Northumberland Park will set out proposals for wider regeneration initiatives in the area in due course.

When the submission version of the Core Strategy was published for consultation purposes in May 2010 (12 months ago) the Club submitted representations indicating support for the spatial strategy as a whole, whilst raising a number of points of clarification or detail.

In the 12 months that have passed since the Submission version of the Core Strategy was made available for consultation there have been some changes in circumstances affecting the Club's proposals which the Club considers ought to be reflected in the Core Strategy so that it is properly up to date and therefore sound.

**Changes in Circumstances**

**(a). Revised Development Proposals for White Hart Lane Stadium**

The references in the Core Strategy to the Club's proposals are based upon a planning application that was submitted in October 2009 but withdrawn in May 2010 because of objections from statutory consultees (including English Heritage) to certain elements of the scheme. A new planning application was submitted, also in May 2010, which included a number of changes intended to overcome the concerns that had been raised. An important change was a reduction in the number of residential units proposed from 434 to 200.

The London Borough of Haringey resolved to approve the application in September 2010, subject to a Section 106 Planning Obligation covering a number of matters, including a Transport for London requirement for a substantial financial contribution to a planned upgrade of the Tottenham Hale Interchange.

**(b). The Importance of the Tottenham Hale Interchange Project**

A Tottenham Hale Gyratory Project is identified in Appendix 3 of the Core Strategy as an important piece transport infrastructure necessary to the delivery of the Core Strategy in the period to 2026. By contrast, the Interchange Project is not mentioned in the Core Strategy although it is a central component of the development proposals described in the "Transforming Tottenham Hale Urban Centre Masterplan Supplementary Planning Document" ("the SPD").

In negotiations between the Club, Transport for London and London Borough of Haringey the Interchange Scheme was identified to be separate from the Gyratory Scheme and was said to be of fundamental importance to planned growth at Tottenham Hale. That is because of the substantially increased capacity that the scheme would provide for passengers to interchange between London Underground, National Rail and London Bus services, as well as to pass between the station and the street.

Consequently the scheme is one of those listed in a Memorandum of Understanding entered into formally between the Council and Transport for London in 2008 that is intended to regulate the collection and disbursement of financial contributions levied on development proposals within the Masterplan area – or outside it where the development would produce demand affecting transport facilities within the Masterplan area.

A contribution from the Club to the scheme was sought because of the anticipated usage of the station in particular by spectators travelling to and from matches at the new stadium on weekday evenings. The concern expressed by Transport for London was the demand from spectators would pre-empt capacity that would otherwise be taken up by other planned developments not only at Tottenham Hale itself, but in the wider Upper Lea Valley Opportunity Area (which is identified for significant growth in the Replacement London Plan).

A contribution was ultimately agreed and the Section 106 Obligation is close to completion. The amount of the contribution will vary according to the eventual cost and timing of the Interchange Project but according to the funding formula will amount to around 15% of the total cost, or between £1.25m and £3.0m, of which an initial payment of £100,000 is to enable feasibility work to be undertaken on a project design.

The negotiations concerning this aspect of the Section 106 Obligation, all of which followed the publication of the Submission Core Strategy, have revealed not only the importance of the Interchange Project to the levels of growth planned for Tottenham Hale in the Core Strategy, but also that uncertainty currently attaches to whether and when the necessary interchange works will be carried out and how they will be funded.

At present, that is not reflected in the Core Strategy whose only reference to the Interchange Project is a single bullet point in the list of development aspirations for Tottenham Hale on page 63 of the draft. In the absence of any other reference (including in the schedule of key infrastructure in Appendix 3) the bullet point is almost meaningless and certainly open to be confused with a reference to the separate and comparatively modest gyratory scheme.

The lack of focus on the Interchange Project is surprising given that it is identified in the SPD as one of the six key development sites covered by the Masterplan (SPD Figure 20, Site 4) where the proposal is for a "new enhanced station with potential for residential above". A more detailed specification for the interchange function of the new station is provided in paragraph 7.6.3 and for the station redevelopment as a whole in paragraph 7.6.4.

If the Interchange Project is genuinely necessary to support the level of development that is planned in the Core Strategy for Tottenham Hale and there are uncertainties about when or if it will be delivered, it should be acknowledged in the Core Strategy and an appropriate review mechanism should be specified (whether that

is an early review of the Core Strategy itself or the planned Area Action Plan for Tottenham Hale that is already proposed in the approved Local Development Scheme).

**(c). Whether the Stadium Redevelopment Will be Delivered**

The stadium redevelopment scheme is a large, complex and difficult to deliver project. The scheme which the Council has resolved to approve differs from the scheme that is referred to in the Core Strategy: it contains substantially less residential development (200 rather than 434 new homes) and involves substantially more cost (because of measures incorporated to meet concerns on heritage grounds).

Since the Council resolved to grant planning permission for the development the Club has made public its concerns about its ability to deliver the scheme, taking into account the changes to the content of the scheme, the associated burden of Section 106 obligations (including in relation to the Tottenham Hale Interchange Project) and current economic conditions.

Whilst the Club is working closely with the London Borough of Haringey to see if these issues can be overcome, it cannot be said with certainty that they will, or over what timescale.

At present, that is not reflected in the Core Strategy.

**(d). Other Regeneration Initiatives**

In the light of these uncertainties the London Borough of Haringey has been in discussions with the Mayor of London over a number of initiatives intended to give a special focus to the development and regeneration needs of Northumberland Park and the surrounding area, including Seven Sisters and Tottenham Hale (what might be termed the "N17" area). The options include the possibility that the Mayor will designate all or part of the area as a Mayoral Development Corporation ("MDC") when the power to do so is created through the Localism Bill; and/or the designation of an Enterprise Zone within the same area. Either initiative would have important implications for the planning and development of the area, but at present the possibility is not referred to in the Core Strategy.

**(e). The Planning for Growth Statement**

The Planning for Growth Statement acknowledges that there is a risk that plans (and development projects) formulated in the property market and economic conditions that existed before the global recession have become out-of-date because they have been overtaken by events. Local Planning Authorities are urged to ensure that their plans and policies are up-to-date so that the development necessary to stimulate economic recovery can take place.

It is important that the Core Strategy properly reflects the approach advocated in the Plan for Growth statement, either by allowing sufficient flexibility within the Core Strategy for subordinate Development Plan Documents ("DPDs") - including the various Area Action Plans ("AAPs") - to be prepared in accordance with the spatial strategy whilst in detail reflecting prevailing property market and economic conditions at the time that they are prepared; or by providing for an early and rapid review of the Core Strategy to be undertaken as circumstances change; or both.

That would ensure that the consequences of any uncertainties around the delivery of the stadium redevelopment project or the implementation of the Tottenham Hale Interchange Project (for example in terms of housing delivery) could be taken into account without delay in either a review of the development plan or in the preparation of subordinate DPDs and AAPs, so avoiding the risk that the plan becomes an obstacle to the delivery of alternative development, rather than supporting and "driving" growth, as the Planning for Growth statement anticipates.

**(f). Replacement London Plan**

As the arrangements for the Core Strategy Public Examination were being made, the Panel Report following the Public Examination of the Replacement London Plan was published. It is now likely that the Replacement London Plan will be adopted before the Core Strategy and whilst the Core Strategy has been designed to take into account the possible impacts of the Replacement London Plan, textual changes are needed to bring the Core Strategy up-to-date.

**Necessary Changes to the Core Strategy**

In our view to bring the Core Strategy up-to-date and also incorporate a degree of flexibility to reflect current circumstances can be achieved without the need for substantial or significant alternations to the Core Strategy. A schedule of changes dealing with each of the issues we have identified is enclosed. We have not identified the changes needed to reflect the latest position of the Replacement London Plan, since they are numerous (if minor) and will be brought to the Inspector's attention by the Council.

However, we have identified one change that has come to our attention on an incidental basis when investigating the Core Strategy proposals for Tottenham Hale in the light of the Club's interest in the uncertainty attaching to the Interchange proposal. That is a possible conflict between the strategy to promote large scale mixed use development within the Growth Area and the protection of industrial sites applied by Policy SP8 and illustrated by Figure 5.1. This is not something that we have investigated in detail (although we are away of a change proposed by the Council in relation to the status of at least part of the area to be a local, rather than a strategic employment area), but there is a risk of internal inconsistency and also inconsistency with Policies 3 B.4 and 2 A.10 of the London Plan. Almost certainly that is unintentional and we bring it to the Council's attention so that it can consider whether any minor change is necessary to clarify the position.

**The Public Examination**

We do not expressly seek to appear at the Public Examination, but if there a matters arising from these representation that require investigation in the public sessions, we would be willing to attend as required.

Otherwise if you have any queries or require any further information, please contact us.

Yours sincerely



**Richard Serra MRICS MRTPI**  
Director

cc. Marc Dorfman - LBH  
Terry Knibbs - LBH  
Paul Phillips - THFC