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date: 4 March 2016



Local Plan Team
Level 6, River Park House
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London
N22 8HQ

SENT VIA EMAIL: ldf@haringey.gov.uk

Dear Sir/Madam,

**HARINGEY LOCAL PLAN REGULATION 19 CONSULTATION - PRE-SUBMISSION RESPONSE.
REPRESENTATIONS ON BEHALF OF TOTTENHAM HOTSPUR LIMITED AND ITS GROUP COMPANIES.**

a) Introduction

1. We are instructed by Tottenham Hotspur Limited and its Group Companies ("THFC" or "Club") to submit the enclosed written representations on the Haringey Local Plan Pre-Submission Consultation. We will be commenting on the following pre-submission documents:
 - Alterations to the Strategic Policies (January 2016);
 - Development Management DPD (January 2016);
 - Site Allocations DPD (January 2016); and
 - Tottenham Area Action Plan (January 2016).
2. THFC welcomes the opportunity to comment on emerging policies that relate to the wider Tottenham area given its ongoing commitment to work in partnership with Haringey Council, the Greater London Authority and the local community in delivering sustainable regeneration in Tottenham.

b) Background

3. On 26 March 2015 THFC submitted representations on the Haringey Local Plan Preferred Options Consultation. A copy of these representations are enclosed at **Attachment 1**. Aside from where the contents of the 26 March 2015 representations are updated by the THFC representations on the Local Plan Pre-Submission Consultation, these previous representations still stand.
4. The 26 March 2015 representations set out briefly the THFC commitment to creating a new stadium in its current location which culminated in the Northumberland Development Project ("NDP"). They also set out the key components of planning permission HGY/2010/1000 to redevelop the stadium. Phase 1 of the NDP scheme has been completed and comprises a Sainsburys superstore and Lilywhite House which is home to both Tottenham University Technical College and THFC's offices.



5. Since March 2015, Haringey's Planning Sub Committee has resolved to grant planning permission (on 16 December 2015) for revised proposals for the stadium and the remainder of the site (LPA ref. HGY/2015/3000). The changes from the earlier permission include:
 - A larger stadium (61,000 seats instead of 56,250)
 - An increase in the number of residential units permitted (585 rather than 285)
 - A new Club store and museum ("The Tottenham Experience")
 - An Extreme Sports Centre (Use Class D2)
 - A 180 bedroom hotel with 49 serviced apartments
 - A community medical centre
 - 4,000m² of flexible community/office space (Use Class D1 or B1)
 6. Alongside application HGY/2015/3000, the Planning Sub Committee also resolved to grant listed building consent (application ref. HGY/2015/3001) for internal and external works to No. 744 High Road in connection with the use of the building for ancillary museum uses as well as temporary planning permission (application ref. HGY/2015/3002) for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years. The decision for this application was issued on 12 February 2016.
 7. On 25 February 2016, the Mayor of London gave his approval to the revised stadium approvals.
 8. The NDP represents an investment of over £600 million and its scale, proposed uses and location mean it is of significant importance not just within North Tottenham, but within Greater London as a whole. It is against this background that the THFC representations to the draft policy documents are made.
- c) **Alterations to the Strategic Policies Pre-Submission Version (January 2016)**
- i. ***Policy SP1: Managing Growth***
9. THFC continue to support the promotion of development in the North Tottenham Growth Area (which includes Northumberland Park, the redevelopment of THFC Stadium and High Road West). THFC also support the identification in supporting paragraph 3.1.8 that Areas of Limited Change can make an important contribution towards the overall local development needs of the Borough, especially given the minimum number of new dwellings that Table 2 identifies are expected to come forward in Areas of Limited Change (4,260 units).
 10. Supporting paragraph 3.1.34 describes the Football Club as Haringey's most significant visitor attraction. Supporting paragraphs 3.1.35 and 3.1.36 describe the Council's aspirations for the redevelopment of THFC stadium and how further details will be set out in an Area Action Plan. Further comments on the Tottenham Area Action Plan (AAP) are set out below. Under the 'Spatial Vision for Tottenham', the AAP

describes the THFC Stadium and the area as the “premier leisure destination” in London. THFC are wholly supportive of this objective, however in order to aid the effectiveness of both policy SP1 and the AAP Vision, the aspirations under paragraph 3.1.35 of the Strategic Policies document should be amended as follows (deleted text struck through, proposed text in red):

“Provision of appropriate retail and leisure uses to deliver the premier leisure destination in London;”

d) **Development Management DPD Pre-Submission Version (January 2016)**

i. ***Policy DM1: Delivery High Quality Design***

11. THFC support the incorporation of policy DM3: ‘Privacy and protection from overlooking’ from the Development Management Policies Preferred Option Consultation (February 2015) into policy DM1 and the removal of prescribed distances between neighbouring homes. This is consistent with the Mayor’s Housing SPG (para. 2.3.30) which recognises the unnecessary restrictions that can be placed on development through using minimum separation distances.

ii. ***Policy DM6: Building Heights***

12. THFC support the amendments to Figure 2.2 to define wider Tall Building Growth Areas, which for Northumberland Park aligns with the North Tottenham Growth Area. This will allow the exact location for tall buildings to be defined through site analysis and careful design. This is also consistent with paragraph 2.48 of the Pre-submission Tottenham AAP which describes meeting the housing targets of the AAP area through higher density and well-designed taller buildings in accessible locations.

iii. ***DM40: Loss of Employment Land and Floorspace***

13. As previously drafted, Policy DM52: ‘Loss of employment land and floorspace’ of the Development Management Policies Preferred Option Consultation (February 2015) made provision for the loss of employment floorspace to non-employment uses, subject to a number of criteria. These included that the site was no longer suitable or viable for its existing or an alternative business or industrial use; or a change of use was required to enable site redevelopment as part of a strategically coordinated regeneration scheme or programme, with demonstrable wider community benefits that outweigh those of retaining the land exclusively for industrial and business use. Supporting paragraph 5.26 of DM52 stated:

“The Council will strongly resist proposals involving the loss of employment land. However, in line with the National Planning Policy Framework, it is important to promote economic development by ensuring that sites are not needlessly protected when there is no reasonable prospect of them coming forward for specific types of development.”

14. As previously drafted, Policy DM52 did not exclude designated employment land from conversion to non-employment uses, where the criteria were met. Policy DM52 is similar to Haringey Unitary Development

Plan (UDP) Policy EMP4 Saved (March 2013): ‘Non Employment Generating Uses’ which allows for, subject to criteria, the redevelopment or change of land and buildings in an employment generating use. Again, policy EMP4 does not exclude designated employment land from changes of use.

15. As currently drafted, Policy DM40: ‘Loss of Employment Land and Floorspace’ of the Development Management DPD Pre-Submission Version (January 2016), now only applies to non-designated employment land. The draft policy also introduces a sequential approach to delivering alternative uses.

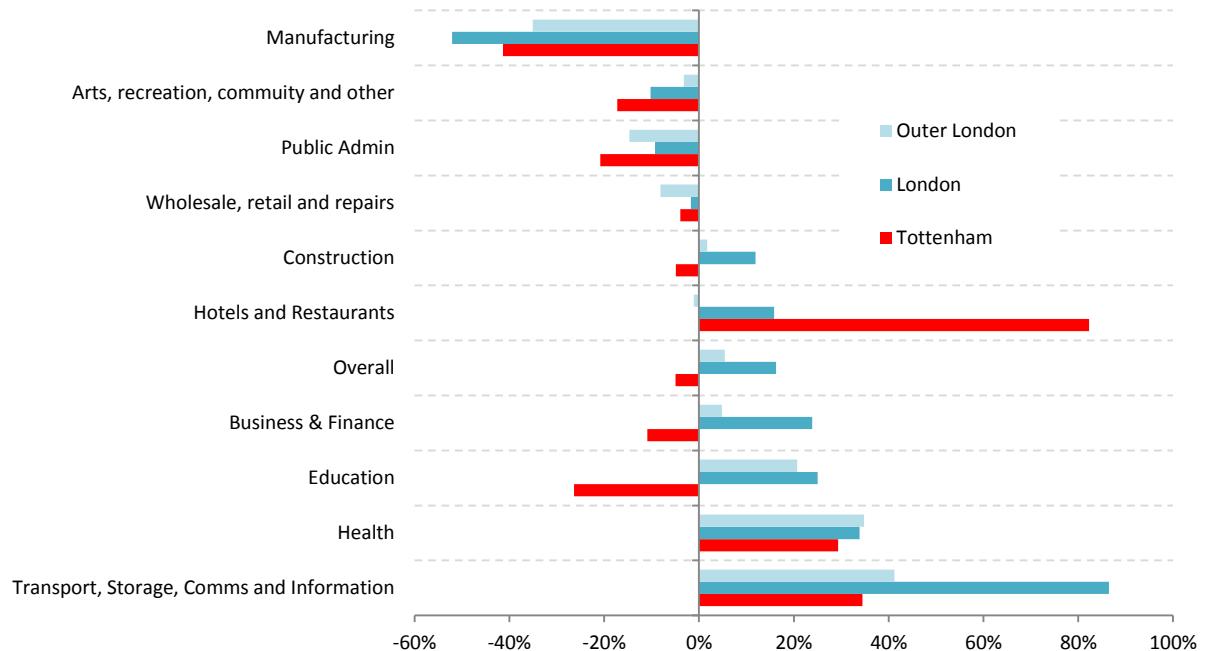
16. THFC object to the application of policy DM40 to only non-designated employment sites. The exclusion of designated employment sites would be inconsistent with paragraph 22 of the NPPF which states:

“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”

17. The Government’s recommended methodology in Planning Practice Guidance for planning for future economic development needs recommends (Reference ID: 2a-032-20140306) that provision should be based on sectoral and employment change, demographic change and associated employment needs, analysis of past take-up and future sectoral requirements, and consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics. Tottenham is an identified area of significant population, demographic and sectoral (economic) change and policy should reflect that.

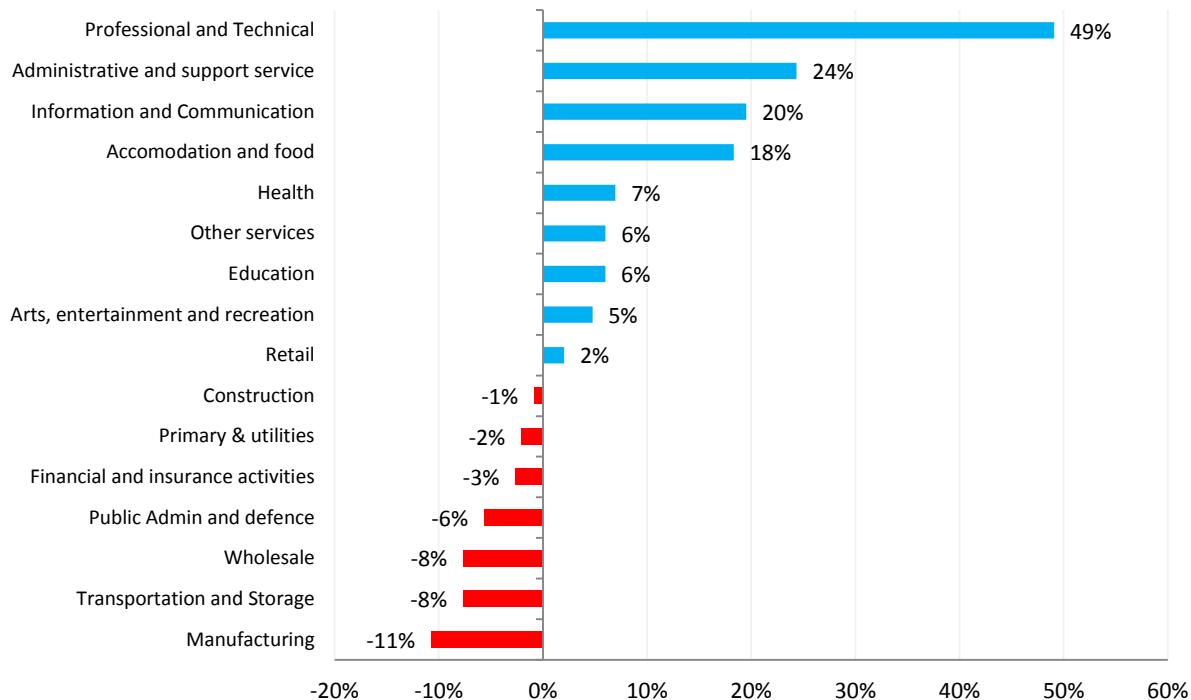
18. This point is evidenced in the change in employment by sector experienced in Tottenham in recent years. As can be seen in the figure below, Tottenham has seen its most significant decline in jobs in the manufacturing sector:

Figure 1: Employment Change by Sector in Tottenham, London and Outer London, 2003-2013 (ABI/BRES)



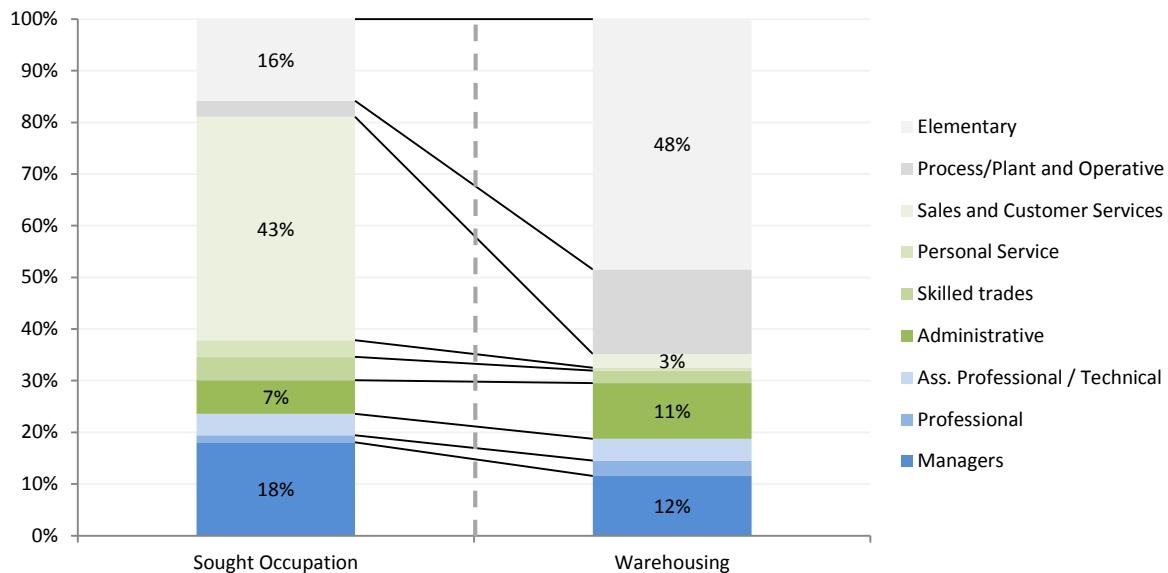
19. Whilst Figure 1 may suggest that employment in transport and storage sectors has increased, a more fine-grained approach indicates that this recent growth is mainly accounted for by industries such as computer programming and other telecommunications activity, and road and rail transport (altogether accounting for 90% of net growth in the Transport, Storage, Comms and Information sector) rather than in traditional warehousing or manufacturing-related sectors (based on analysis of 4-digit SIC level Annual Business Inquiry and Business Register and Employment Survey data 2003-2013).
20. Based on London-wide sectoral forecasts from the London Plan (2015), this change is anticipated to continue to reduce the need for protection of this type of employment space over the plan period due to a downturn in the number of jobs it is projected to create:

Figure 2: Forecast Employment Growth by Sector in London (London Plan, 2015)



21. Coupled with this, existing demand for employment by current residents (based on JSA sought occupation, DWP, 2015) is overwhelmingly for personal service, sales and customer service roles. Industrial jobs were sought by only 1 in 5 unemployed people in the area. In fact more of Haringey's unemployed were seeking management, professional and associate professional jobs than were looking for jobs in industry. The following chart shows the mis-match between sought occupations of existing unemployed residents and the type of jobs protected by traditional warehouse sectors:

Figure 3: Occupational Structure of Warehouse Employment vs. Current Employment Demand in Tottenham by Occupational Skill (DWP, 2015):



22. Given these changes in the employment and demographic make up in Tottenham, clear policies should be in place to allow designated employment sites to be redeveloped where there is no reasonable prospect of the site being used for the allocated employment use.
23. The exclusion from policy DM40 is also inconsistent with Strategic Policy SP8: 'Employment' which states that Locally Significant Industrial Sites (LSIS) will be safeguarded where they continue to meet demand and the needs of modern industry and business. A clear provision should be made for the redevelopment of LSIS, or parts of LSIS, which don't meet the demands and needs of modern industry and business.
24. The tests set out in saved UDP Policy EMP4 and Preferred Options Policy DM52 provide adequate criteria to rigorously assess whether or not the loss of employment land was acceptable and there is no reason why the policy has been changed in the Pre-Submission version of the document.
25. It is also unclear why the link in Preferred Options Policy DM52 to strategically coordinated regeneration schemes or programmes has been taken out. THFC are currently bringing forward redevelopment proposals at 500 White Hart Lane for a mixed use residential-led scheme and a planning application was submitted on 4 March 2016. The 500 White Hart Lane site occupies part of an LSIS, albeit it is partly vacant and the site as a whole is significantly underutilised. Through the redevelopment of the site, there is the opportunity to help the regeneration of the Love Lane housing estate in Tottenham through the early decant of Love Lane residents to the 500 White Hart Lane site. The scheme has been designed to meet Haringey's Regeneration Team's requirements and in conjunction with prospective residents. This has a clear link to the Pre-submission version of Strategic Policy SP2: 'Housing' which supports strategic improvements of Haringey's housing estates (including Love Lane). The removal of a reference to strategically coordinated regeneration schemes within the loss of employment land/floorspace policy could therefore make it more difficult for such schemes to come forward.

26. Overall and for the reasons set out above, THFC consider that Pre-submission policy DM40 is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, effective or consistent with national planning policy and is therefore as drafted unsound.

e) Site Allocations DPD Pre-Submission Version (January 2016)

i. ***Policy SA4: Safeguarded Waste Sites***

27. In their representations dated 26 March 2015, THFC objected to the safeguarding of 44 White Hart Lane under this policy (**Attachment 1**, paras. 18 – 22). THFC stated in March 2015 that they intended to use this site to facilitate the construction of the stadium and the wider development and that the current occupiers of the site (Redcorn Limited) were relocating their current vehicle dismantling business to their site in Brantwood Road. In effect, the relocation of the business would not result in any net reduction in the processing of waste on the basis that Redcorn Limited business operations would be relocated in their entirety. The relocation of Redcorn Limited to Brantwood Road has now been completed.

28. As set out in paragraph 6 above, on 16 December 2016 Haringey's Planning Sub Committee also resolved to grant planning application HGY/2015/3002 for temporary planning permission for the use of 44 White Hart Lane as a construction compound for the stadium development for a period of 3 years. The decision notice was issued on 12 February 2016. The Planning Sub Committee Report describes how the last use of the recently vacant site was as a vehicle recovery facility (para. 6.16) and notes Recorn's relocation to the Brantwood Road site (para. 11.1.4). Paragraph 6.17 of the Committee Report describes how the 44 White Hart Lane site is within the High Road West site allocation in the emerging Tottenham AAP and states:

"The High Road West regeneration area envisages a comprehensive redevelopment creating residential led mixed use neighbourhood including a new public realm linking White Hart Lane Station and a redeveloped football stadium and an expanded local shopping centre on the High Road opposite the football stadium including the new public square. A master plan for the High Road West area has been prepared, in consultation with local residents and businesses and was considered by Cabinet at its meeting on the 16 December 2014. The Council's Strategic Regeneration Framework envisages that High Road West will play a key role in delivering the aspirations for regenerating the area."

29. The Planning Sub Committee Report goes onto state (para. 11.1.5):

"The principle of an alternative use of the application site for non-waste use is in accordance with development plan policy because the previous waste-handling capacity of the application site has been transferred. In addition the use proposed is only temporary and, following the cessation of the temporary use of the site will be available for redevelopment in accordance with site allocation NT5 or to be returned to waste use subject to the outcome of the North London Waste Plan." [our underlining]

30. In addition, THFC have been liaising with the Environment Agency with regard to waste operations at the 44 White Hart Lane site. Correspondence from THFC to Harginey planning officers to explain the background is included at **Attachment 2**. It explains how the permitted waste capacity of 44 White Hart Lane (75,000 tonnes per annum) has effectively been transferred to Brantwood Road and as such there is no longer a requirement and therefore it is not justified to safeguard the 44 White Hart Lane site.

f) **Tottenham Area Action Plan (AAP) Pre-submission Version (January 2016)**

i. ***Table 1 and Figure 2.4: Economic Assets***

31. Table 1 lists and Figure 2.4 shows High Road West as 'Locally Significant Industrial Land'. High Road West should be removed from this designation in the Table to reflect its removal as an LSIS in the Pre-submission version of Strategic Policy SP8. The Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016) should also be updated to reflect this change.
32. Similarly, the 'High Road East Local Employment Area' should be removed from Figure 2.4 to reflect its de-allocation, as shown on the Haringey Local Plan Strategic Policies 2016 – 2028 Policies Map (January 2016).

ii. ***Town Centres - paragraphs 2.32 – 2.37***

33. Under the 'Town Centres' section of the AAP, paragraph 2.32 describes how the High Road in this part of North Tottenham provides a local centre which could benefit from sensitive improvements and investment. Paragraph 2.33 recognises the proposed new THFC stadium development which involves comprehensive redevelopment with a new hotel, significant retail and leisure offer, museum, offices and housing. The first phase of the development is complete and includes a large retail store (Sainsburys).
34. Paragraph 2.35 states that there is a need to improve the town centre offer across the whole of the Tottenham area, particularly to increase visitation to the centres and ensure their viability. Paragraph 2.37 states that in North Tottenham, there is a need to realise the investment being made by THFC on their stadium as a catalyst for wider change, ensuring this area becomes a hub of activity through the week and not just on match days. This can be achieved by establishing the location as a "premier leisure destination" in London, whilst also retaining a local retail function to support the community. THFC strongly support the objective that the area becomes a hub of activity through the week and not just on match days. However to aid this, the local centre boundary should as a minimum be expanded to include the Sainsburys retail store.

35. This links to the Vision for the North Tottenham Neighbourhood Area set out in paragraph 5.81 of the Tottenham AAP which describes a “substantially improved local centre” and Site Allocation NT5: ‘High Road West’ which describes an expanded local shopping centre as well as a new local centre opposite the stadium. There needs to be much more clarity within the suite of emerging Local Plan documents as to how the Tottenham High Road North Local Shopping Centre will expand. For example, policy SA3 of the Site Allocations DPD sets out amendments to town centre boundaries. To deliver its vision and objectives and support the effectiveness of the plan, a similar area-wide policy should form part of the Tottenham AAP.

iii. The Vision & Strategic Objectives for Tottenham

36. THFC support the ‘Vision’ for Tottenham to become the next great area of London (paragraph 3.1) and consider that the new stadium and associated and supporting development will be an integral part of this. THFC also support the objective in paragraph 3.9 that North Tottenham will become the “premier leisure destination” in London as well as the Spatial Strategy for North Tottenham set out in paragraph 3.23:

“In the North Tottenham neighbourhood, the new Tottenham Hotspur FC stadium development will provide the catalyst for comprehensive regeneration of both High Road West and Northumberland Park. The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area’s reputation as a premier leisure destination within North London.”

37. The Tottenham Physical Development Framework and Tottenham Strategic Regeneration Framework, which are cited in paragraph 3.11 of the Tottenham AAP as helping inform the eight Strategic Objectives, both describe in their Vision creating a new leisure destination at High Road West.

38. As such, to be more effective, THFC consider that this important vision, objective and strategy needs to be supported more strongly in planning policy (as per the comments on Policy SP1 in Section c) above) and that to help delivery it should become an additional Strategic Objective. Proposed wording for Objective 9 is set out below:

"Objective 9: The premier leisure destination in London

Alongside the successful redevelopment of the THFC stadium the priority in North Tottenham is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements. We will support developments which further cement the area's reputation as the premier leisure destination within London."

iv. Policy AAP3: Housing

39. Cross references to the policy need to be updated in supporting paragraphs 4.12, 4.13 and 4.15. They currently refer to AAP2.

v. Policy AAP4: Employment

40. Figure 4.1 should be updated to remove the High Road West and High Road East Employment Areas for the reasons set out in sub-section i) above.

vi. North Tottenham Neighbourhood Area

41. For the same reasons as set out in sub-section iii above, the key objectives for the neighbourhood should refer to North Tottenham becoming the “premier leisure destination” in London. Paragraph 5.84, bullet point 6 should be amended to aid effectiveness as follows (deleted text ~~struck through~~, proposed text in red):

"To create a new the premier leisure and sports destination for London, with the provision of complementary commercial, cultural and community uses across the neighbourhood area whilst celebrating the High Road's rich heritage."

vii. Site Allocation NT4: Northumberland Park

42. The ‘Development Guidelines’ include that development should complement the ongoing operational requirements of THFC. THFC consider that for clarity this should be expanded to include reference to the operational requirements envisaged as follows (deleted text ~~struck through~~, proposed text in red):

"Development should complement the ongoing operational requirements of THFC which include ongoing outside broadcasting requirements as well as an NFL fanzone area."

43. Additionally, given the size of the allocation, proximity at its western end to the THFC stadium and the leisure objectives for the sub-area, the potential for new leisure opportunities should be introduced into the Development Guidelines (deleted text ~~struck through~~, proposed text in red):

"The potential for new **leisure and** employment opportunities to be developed along Park Lane should be explored, in line with the Council's ambitions to revitalise this key Local Centre."

viii. Site Allocation NT5: High Road West

44. The Development Guidelines refer to part of the site having a licensed waste capacity, and this will need to be reprovided before development of this section of the site can commence in line with Policy SA4. We have provided commentary on Policy SA4 in the context of this site in Section e) above and for the reasons set out consider that this guideline should be removed.

ix. Site Allocation NT7: Tottenham Hotspur

45. In addition to referencing the Existing Planning Permission (HGY/2010/1000) reference should be made to planning and listed building consent applications HGY/2015/3000, HGY/2015/3001 and HGY/2015/3002 which were resolved to be granted by Haringey's Planning sub-committee in December 2015. The description of developments are set out below:

HGY/2015/3000:

"Proposed demolition and comprehensive phased redevelopment for stadium (Class D2) with hotel (Class C1), Tottenham Experience (sui generis), sports centre (Class D2); community (Class D1) and / or offices (Class B1); housing (Class C3); and health centre (Class D1); together with associated facilities including the construction of new and altered roads, footways; public and private open spaces; landscaping and related works. Details of "appearance" and "landscape" are reserved in relation to the residential buildings and associated community and / or office building. Details of "appearance" and "scale" are reserved in relation to the sports centre building. Details of "appearance" are reserved in relation to the health centre building. Proposal includes the demolition of 3 locally listed buildings and includes works to a Grade II Listed building for which a separate Listed Building application has been submitted (Ref: HGY/2015/3001)."

HGY/2015/3001:

"Listed building consent for internal and external works to No.744 High Road, all in connection with the use of the building for ancillary museum uses associated with a separate planning application for the Northumberland Development Project."

HGY/2015/3002 (at 44 White Hart Lane):

"Erection for a temporary period of, together with use as, a construction compound."

46. As per the March 2015 THFC representations, the Site Allocation (part A) should be updated to make reference to retail to reflect the permitted retail uses, including the now completed retail store.

47. The seventh site requirement makes reference to leisure uses being complementary. Given that the principal focus of the allocation is a leisure use, we assume that the reference should be to retail uses (deleted text struck through, proposed text in red):

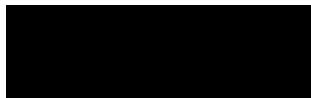
"The ~~leisure~~ retail/commercial uses should be complementary and not compete with the uses proposed on the expanded Local Centre on the western side of the High Road within the High Road West area."

g) Conclusion

48. Overall, THFC support the positive approach that Haringey's emerging Local Plan proposes for redevelopment within the North Tottenham area and look forward to continue to work with the borough to bring forward the football stadium and associated developments.
49. As set out above, THFC consider that a number of refinements are required to some of the policies and objectives to help North Tottenham to become the "premier leisure destination" in London as well as with the delivery of the Local Plan's key objectives.

We should be grateful if you would confirm receipt of these representations and attachment.

Yours faithfully,



Matthew Sherwood
Associate

Cc Richard Serra – Tottenham Hotspur Football & Athletic Co Ltd
 Lyn Garner – Haringey Council

Attachments:

- THFC Representations on Haringey Local Plan Preferred Options Consultation dated 26 March 2015.
- THFC Letter to LB Haringey – '44 White Hart Lane and Waste Site Protection Status' dated 26 February 2016.