

our ref: Q70106  
your ref:  
email: [matthew.sherwood@quod.com](mailto:matthew.sherwood@quod.com)  
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Local Plan Team  
Haringey Council  
River Park House (6<sup>th</sup> Floor)  
225 High Road, Wood Green  
London N22 8HQ

**SENT VIA EMAIL:** [localplan@haringey.gov.uk](mailto:localplan@haringey.gov.uk)

Dear Sir/Madam,

**HARINGEY LOCAL PLAN MAIN MODIFICATIONS PUBLIC CONSULTATION: REPRESENTATIONS ON BEHALF OF TOTTENHAM HOTSPUR LIMITED AND ITS GROUP COMPANIES (THFC)**

**a) Introduction**

On behalf of Tottenham Hotspur Limited and its Group Companies (“THFC”) we have reviewed the proposed Main Modifications to the Haringey Local Plan documents. Overall THFC support the modifications that have been proposed following their previous Representations and the dialogue that took place during the Examination in Public (EiP). However, THFC believe that further modifications are needed to Development Management DPD Policy DM37 (Maximising the Use of Employment Land and Floorspace) to ensure that the approach that was discussed at the EiP is fully incorporated. This will be discussed further in sub-section c) below. The remainder of these Representations will take each of the Local Plan documents in turn and provide a brief commentary on any relevant modifications.

**b) Alterations to the Strategic Policies**

THFC support the amendment to paragraph 3.1.35 to incorporate reference to delivering a “premier leisure destination” in London and agree that this will clarify the Council’s aspiration for the area following the grant of planning permission for the new THFC stadium.

THFC also support the amendment made to Strategic Policy SP8, which now recognises that demand for B Class floorspace can be met in part through “intensification of the use of existing employment sites”.

**c) Development Management DPD**

Following discussions at the EiP, THFC produced the following proposed amendments (**Attachment 1**) to policies DM38 and DM40. THFC note that these amendments have not been incorporated but that Policy DM37 (Maximising the Use of Employment Land and Floorspace) has been extended with additional wording referring to the proposals in Locally Significant Industrial Sites (LSIS) that do not propose B1 to B8 uses. THFC believe that the wording as proposed does not provide the specificity required to ensure it can be interpreted correctly, namely:

- I. There is no need for circumstances to be ‘exceptional’ in addition to the detailed stipulations outlined in the new Part B sub-sections a) to e), or a definition of what ‘exceptional’ means in this context;
- II. With reference to sub-section a), this should relate to identified demand for employment space, by type, outlined in amended policy SP8 (i.e. mainly B1 space) and defined by the ELR (which should take into account future demand and wider economic change).



- III. With reference to sub-section b), this should state explicitly that the proposals will include a mix of uses, inclusive of the uses needed to maintain the role of the LSIS. It should also state that the uses support the safeguarding of employment rather than the specific 'industrial or commercial uses'.
- IV. With reference to sub-section c), this should refer to the enabling of strategic regeneration benefits, rather than just the delivery, reflecting the level of strategic interrelated sites in the area.
- V. With reference to sub-section d), this should refer to the employment capacity of sites, rather than the land or floorspace, in order to reflect the importance of meeting the [evolving] needs of modern industry and business identified in (a) and the intensification of uses identified in Strategic Policy SP8.

As such, THFC's view is that the wording of Policy DM37 Part B should be amended as follows:

*Within Locally Significant Industrial Sites (LSIS), proposals for uses not within Use Classes B1 to B8 will only be supported in exceptional circumstances where the following can be demonstrated:*

- a) *The proposal is necessary to facilitate will contribute towards meeting the identified demand needs of modern industry and business; or*
- b) *The proposal relates to includes a mix of uses including a use which supports the continued functioning of the LSIS as a predominantly to safeguarding industrial and commercial area employment; or*
- c) *The proposal would deliver or enable strategic economic regeneration benefits of a borough or sub-regional scale including supporting the delivery of Growth Areas; and*
- d) *The net loss change in of the employment capacity of the B Use Class land or floorspace would not compromise the strategic employment land requirement; and*
- e) *The proposal would not restrict, prevent or in any way prejudice the continued operation of adjoining or nearby established employment uses.*

In order to reflect this in the supporting text, THFC propose that the supporting paragraphs could be made more explicit with reference to points (a) and (c) above - primarily within paragraphs 6.3 and 6.7:

Paragraph 6.3 – *"The following section sets out detailed policies to assist in managing development within Haringey's employment land hierarchy. The policies are needed to ensure that the use of land is fully optimised to enable the maximum amount of jobs and in employment floorspace that is responsive to the needs of modern industry and business and in context with wider regeneration plans to be provided on sites, as well as to encourage and attract the types of businesses that are supported by the Council's economic and regeneration strategies."*

Paragraph 6.7 – *"Technical evidence, including Haringey's Employment Land Study (2015), indicates that the Borough's stock of employment land will remain a key source for local business and jobs. Accordingly, Policy SP8 sets out a hierarchy of employment land that will be safeguarded to meet future need. However, beyond such protection a gradual restructuring of the Borough's employment land portfolio is also required to meet the needs of modern industry and business. This is to enable the modernisation of existing sites and older buildings so as to attract a wider range of businesses to the Borough, deliver jobs and premises that the economy needs, make more efficient use of land, recognise their role in the wider strategic regeneration of the borough and ultimately, to increase the number and quality of businesses and jobs that can be accommodated on sites."*

THFC note that the title of Policy DM38 has been amended to remove "employment-led", but that Part A (and supporting text at paragraph 6.2) has been amended to stipulate that proposals should be both "mixed use" and "employment led". THFC consider that the definition of "employment-led" is unclear and potentially undermines the definition of "mixed-use". THFC consider that, applying the proposed stipulations below, the continuing role of the site as an employment generator should be sufficient definition rather than inclusion of "employment-led". The same point is made in relation to the inclusion of "employment-led" in the proposed new Policy DM40 Part A.

THFC note that the modifications to policy DM38 are influenced partly by the incorporation of reference to LSIS in Policy DM37 (new) Part B. This is considered acceptable if the above modifications are included.

THFC believe that Policy DM38 Part A sub-section (b) should align with the above proposed amendments to DM37 related to meeting the needs of modern industry and business, in that the proposals should demonstrate not a retention of the quantum of floorspace, but a retention or increase in the number of jobs supported, and justification that these jobs are responsive to local and wider needs (of the changing economy, and local demand from SMEs, for example).

**d) Site Allocations DPD**

THFC note that the modifications to Policy SA4 (Safeguarded Waste Sites) align with the Statement of Common Ground (SoCG) between THFC and LB Haringey and support the proposed modifications to the policy. The associated amendments as set out in the SoCG have also been made to Site Allocation NT5 (High Road West) and para. 5.92 of the Tottenham Area Action Plan.

**e) Tottenham Area Action Plan**

THFC support the update to the AAP Key Diagram that shows the extended local centre boundary for North Tottenham which was agreed as part of the SoCG between THFC and LB Haringey and presume that this will also be included on the updated Proposals Map. THFC support the insertion of the new supporting paragraph after para. 2.37 which relates to the new local centre and also formed part of the SoCG.

THFC agree with the modifications to Site Allocation NT7 (Tottenham Hotspur Stadium) which recognise the latest planning permissions and the retail uses that form part of the consented scheme as well as the modification to para. 5.84 to create a 'premier' leisure and sports destination for London.

We should be grateful if you would confirm receipt of this letter.

Yours faithfully,



Matthew Sherwood  
Director

Cc Richard Serra – Tottenham Hotspur Football & Athletic Co Ltd

**Attachments:**

Attachment 1 – THFC comments on Policies DM38 and DM40 following EiP (issued to LB Haringey on 21.09.16)