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Planning Policy Team London Borough of Haringey River Park House (6th Floor) Wood Green London N22 8HQ

By post and email



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Dear Sirs

London Borough of Haringey Local Development Framework
Core Strategy Additional Regulation 27 Consultation on Affordable Housing and
Employment Land Designations
Representations by Tottenham Hotspur Football Club

We are instructed by Tottenham Hotspur Football Club ("THFC") to respond to the Council's additional Regulation 27 consultation on fundamental changes to employment land designations under Policy SP8. We have confined our comments specifically to the changes being consulted upon and to this extent, the comments below should still be read in conjunction with THFC's previous representations in June and July (enclosed).

Background

Planning permission (HGY/2010/1000) and related consents for the Northumberland Development Project ("NDP") were granted on 20 September 2011. The NDP is described in more detail in our letter of 21 June 2010 but principally comprises the redevelopment of White Hart Land stadium to provide a new 56,250 capacity football stadium; new foodstore and 200 new homes.

The significant catalytic effects of this development opportunity are identified both in the UDP¹ and the Submission Core Strategy². There is a package of measures within the NDP planning obligations (covering issues ranging from employment and skills; inward investment; and support and regeneration masterplanning) to ensure that the potential regeneration benefits of the scheme are maximised. THFC has also commenced initial discussions with the Council about the masterplanning of the wider area and where strategic interventions may be appropriate. It is in this context that these comments are made.

Comments on Policy SP8 (Employment)

THFC recognises the need to provide a sufficient supply of flexible employment land in order to help facilitate investment by new businesses in the Borough and as such the Club broadly supports the aims of Policy SP8. There are, however, a number of specific comments THFC wishes to make in response to the fundamental changes now being proposed by the Council that it THFC believes may fetter the regeneration of the wider area surrounding White Hart Land in accordance with clearly stated objectives elsewhere in the Core Strategy and though the Opportunity Area status afforded by the Replacement London Plan.

² Paras. 1.3.23, Page 29 ("Opportunities"), Policy SP1, para. 3.1.30, para. 3.1.28, para. 7.2.17



¹ Site Specific Proposal 13 ("Expansion, including better facilities and mixed-use development, including residential and possibly a hotel").



As general point of clarification, THFC notes that there are references in the table at pages 22 to 26 to "IL" or "Industrial Land", which unlike "Employment Land" does not readily appear to be defined or explained elsewhere.

DEA8 (N17 Studios 784-788 High Road, N17)

This site was designated as Employment Land and that no change is proposed.

The entire site lies within the approved NDP application site boundary and is therefore the subject of complete redevelopment. Indeed the majority of buildings that previously comprised the N17 Studios estate have now been cleared and an ongoing DEA designation now appears inappropriate.

THFC requests that the present Employment Land designation be deleted.

DEA9 (High Road West)

This site was designated as Industrial Land, but is now proposed as Employment Land with the intention that complementary uses are allowed in addition to traditional uses. Complementary uses are now defined as "small scale walk to services for example cafes and crèche/nursery, creative and cultural industries."

THFC does not believe the proposed re-designation from Industrial Land to Employment Land will provide the flexibility required to support the regeneration of Northumberland Park consistent with either the "Northumberland Park Area of Change" or more specifically with THFC and the Council's regeneration aspirations for the area and the emergence of a masterplan and Area Action Plan.

THFC requests that the proposed Employment Land designation be amended to a **Regeneration Area** designation, the effect of which would be to provide crucial development plan support for the regeneration area ahead of the formulation of a more detailed Area Action Plan.

DEA17 (White Hart Lane)

The site was designated as Industrial Land but is now proposed as Employment Land with the intention that complementary uses are allowed in addition to traditional uses.

THFC does not believe the proposed re-designation from Industrial Land to Employment Land of this site will provide the flexibility required to support the regeneration of Northumberland Park consistent with the "Northumberland Park Area of Change", THFC or the Council's regeneration aspirations for the area and the emergence of a masterplan and Area Action Plan.

THFC requests that the proposed Employment Land designation for DEA17 be amended to a **Regeneration Area** designation, the effect of which would be to provide crucial development plan support for the regeneration area ahead of the formulation of a more detailed Area Action Plan.

Please do not hesitate to contact Richard Serra or Christopher Martin in this office if you require any further information or clarification.

Yours faithfully

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Savills (on behalf of Tottenham Hotspur Football Club)

cc Marc Dorfman – Haringey Council Paul Phillips – THFC

Andrew Downes – THFC