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Litha Efthymiou
Programme Officer
London Borough of Haringey
639 High Road
Tottenham
London
N17 8BD

Richard Serra
E: rserra@savills.com
DL: +44 (0) 113 220 1271
F: +44 (0) 113 244 0104

Ground Floor
City Point
29 King Street
Leeds LS1 2HL
T: +44 (0) 113 244 0100
savills.com

Dear Madam

**Haringey Core Strategy Examination in Public
Further comments on behalf of Tottenham Hotspur Football Club**

We refer to our letter dated 2 June 2011 in which we identified several sections of the Core Strategy where in our view changes are needed in order to ensure (a) that the Core Strategy is up-to-date and (b) that it properly reflects the approach to plan making and development management advocated in the Plan for Growth Written Ministerial Statement. With our letter was a schedule setting out specific proposed changes intended to reflect our comments.

We have subsequently received a version of the schedule annotated on behalf of the Council. We understand that it is to be taken as the Council's substantive response to our representations and consider that it is useful in identifying the differences between the parties. For the most part it is therefore unnecessary for us to comment further: the respective positions are clearly set out enabling the Inspector in due course to make such recommendations as may be appropriate on the issues concerned.

However, it is necessary for us to comment further on one issue, which is the need for the Core Strategy to fully take into account the planned Tottenham Hale Interchange Project. As we understand it, the Council's position is that can be achieved by simply adding a reference to the scheme in an appendix to the Core Strategy, with no other changes required. From the brief discussion of the topic which took place during the Matter 4 hearing session, it would appear that is in part because the Council consider that the Interchange Project consists of distinct, severable elements (some concerned with "local" public transport facilities; others concerned exclusively with surface railway facilities) not all of which are relevant to development planned for in the Core Strategy.

That is not consistent with the information about the Interchange Project that was provided to our client during negotiations over public transport contributions as part of the development management process for the Northumberland Development Project (the Club's new stadium proposals).

The Club were provided by Transport for London (who are the promoters of the scheme) with the details of a "Stage C" design together with abstracts of capacity forecasts which were said to demonstrate that the scheme was essential in order to enable a variety of planned developments to proceed, including in the Tottenham Hale Area of Change. The existing facilities at Tottenham Hale include a surface railway station operated by Network Rail (NR); a Victoria Line underground station operated by London Underground Ltd (LUL); and bus and taxi facilities. The Stage C design shows improvements to both the NR and LUL stations including the concourses and "gate lines" linking them as well as to the pedestrian routes between the stations and the bus and taxi facilities. The purpose of the improvements is to increase capacity within the stations as well as when moving between them and between them and the other transport facilities, thereby

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enhancing the capacity and function of the "interchange" as a whole. We include a copy of the layout diagram derived from the Stage C scheme in **Appendix 1**.

Improvements to the bus and taxi facilities and to certain of the pedestrian routes linking with the existing station are to be carried out as part of the Tottenham Hale Gyratory Project. To that extent the Council is correct to identify that some elements of the enhanced interchange are already programmed as a separate scheme. However, it is not consistent with the information supplied during the planning application process to describe the Interchange Project itself as severable. As is clear from the Stage C layout diagram, a comprehensive scheme encompassing the entirety of the NR and LUL stations is envisaged.

Although not relevant to the Northumberland Development Project, it was indicated that as part of developing the Interchange Project detailed consideration had also been given to a mixed use development in the airspace above the interchange and it would appear that has been taken into account when formulating the proposals and estimating the development capacity of the Area of Change through the current Tottenham Hale Urban Masterplan Supplementary Planning Document. The prospects for a development of this kind are explicitly referred to and a conceptual master plan for the site would appear to have been prepared by or on behalf of the London Development Agency (LDA) as part of that process. Extracts from the SPD are included in **Appendix 2** and an image of the potential development taken from the LDA website giving an indication of the scale and character of the proposed development are included in **Appendix 3**. The Core Strategy anticipates that the proposals of the SPD will simply roll forward without review: indeed the suggestion that the Greater Ashley Road site should be the next section of the Area of Change to come forward for development based directly upon the SPD.

From this it is clear that the Interchange Project is not peripheral to the development planned for Tottenham Hale. If it were, it would not have been appropriate for the Council to make the planning permission for the Northumberland Development Project contingent upon the provision of a substantial financial contribution towards its delivery under the Memorandum of Understanding signed between the Council and Transport for London in relation to the Tottenham Hale area.

The Council appears to accept that the Interchange Project cannot be overlooked completely in the Core Strategy (as was the case when the Core Strategy was submitted for examination). However, nor is it appropriate to deal with such an important scheme only in a late coda added to an appendix (as the Council now propose). Its relationship to the planned developments at Tottenham Hale in functional terms and in terms of funding should be set out clearly in the relevant sections of the main body of the Core Strategy. Any risks attaching to the delivery of the project and contingency arrangements (such as an early review of the Core Strategy or of the SPD for instance) should there be delay in delivery, should be clearly set out.

Yours faithfully



Richard Serra MRICS MRTPI
Director

APPENDIX 1



- ① unpaid concourse
- ② gateline + ticketing
- ③ paid concourse
- ④ overbridge
- ⑤ platform accommodation
- ⑥ LUL operational staff
- ⑦ NR operational staff
- ⑧ passenger support facilities
- ⑨ secure bicycle parking
- ⑩ disabled car parking
- ⑪ secondary entrance
- ⑫ service parking
- ⑬ retained LUL plant

APPENDIX 2

7.6 Site 4 - Station interchange

Site area: 3.2 ha (approx)

Proposals:

- New, enhanced station with potential for residential above
- Increased capacity for buses, new shelter, new layout
- Step-free interchange
- New taxi rank
- Retail A1- A5 potential
- New, high quality public space

Site character

7.6.1 At present, the physical environment that is encountered upon leaving Tottenham Hale Station is dominated by the overcrowded bus interchange area and the heavy volume of traffic on the gyratory system. The area lacks legibility for pedestrians and cyclists, and functions poorly as a gateway to the wider area. The interchange space itself and the act of changing between the different modes of transport, is inadequate and needs to be improved. It is proposed that the new station will be a state-of-the-art public transport interchange including a new station building and new public space with interchange facilities for buses and taxis. Replacement of the mini-gyratory road system with a new station square would be supported.

Mix of uses

7.6.2

- Potential for a new station building which includes ground floor retail/leisure/workspace with mixed-use commercial/residential building above the station functions
- Retail A1– A5 opportunities fronting the new Station Square
- Dwell space at the corner of Station Square

Interchange

7.6.3 The transport interchange at Tottenham Hale must be state-of-the-art, fully accessible by all users, future-proof and able to accommodate the projected demand for bus, rail and underground services. The interchange also has an important role to play, not only as the hub of the new physical development at

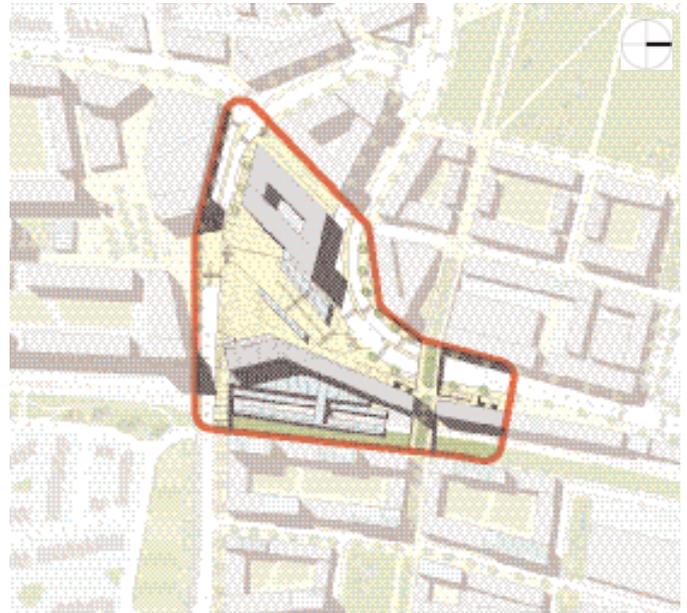


Fig 27 Station Square public realm project

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Tottenham Hale Urban Centre, but as a high quality gateway into London for travellers arriving via Stansted International Airport from the capital cities and regional centres of the European Union and succession countries. The main objectives in relation to the interchange are:

- a larger, enhanced interchange with increased capacity for buses, underground, taxis and rail;
- direct intervisibility and efficient interchange between main public transport modes;
- the physical segregation of public and private transport (particularly in relation to highway access) to minimise congestion problems;
- step free transition between modes, which particularly benefits disabled people;
- increased covered, secure cycle parking;
- increased taxi provision in the form of additional ranks;
- adequate stand and stop space for buses;
- clear signage and information;
- quality pedestrian approaches and waiting facilities;
- public space to allow for milling and orientation;
- active surroundings during the day and evening; and
- a secure and conspicuous interchange area.



Fig 28 Indicative view of new interchange

Station redevelopment

7.6.4 As a gateway into a major residential, employment, retail and leisure destination, the station must present a high quality image, as well as being fully functional, accessible and legible for users. The main objectives for Tottenham Hale Station are:

- unobstructed pedestrian negotiation of all station elements;
- an enhanced link from southbound platforms to the Victoria Line;
- direct access to the station to/ from Ferry Lane at grade level;
- provision of pedestrian and cycle links to GLS site and Watermead Way;
- provision of secure cyclist and cycle parking facilities;
- direct sight-lines and navigability within the station;
- orientation of exits to give widest catchment distribution;
- be future-proofed to cope with changes in services or demand patterns;

- step free access allowed, including to Station Square;
- station layout must be safe - no blind spots;
- station layout must operate efficiently - no duplication of facilities for staffing;
- allowance for PA system and CCTV requirements;
- 'kiss and ride' facilities separated from the bus and taxi areas;
- considered future maintenance - whole life cost issues;
- clear agreements which identify train operators' areas of responsibility;
- provision of shared facilities, particularly ticket selling; and
- provision of other facilities to improve upon the ambience.

Station Square

7.6.5 The public square fronting the enhanced station will be at the heart of the new urban centre and gateway into the wider area, as such, it should fulfill the following broad objectives:



- enable effective, accessible interchange between different modes of transport;
- provide an attractive convenience retail offer for commuters and local people;
- encourage visitors to relax and enjoy the cultural uses expected to cluster around the square; and
- provide a strong sense of orientation and identity, connecting various local neighbourhoods and amenities at the High Road and Lee Valley Regional Park.

Bus interchange

7.6.6 It is likely that existing bus routes serving Tottenham Hale will need to be enhanced in the future in order to serve the new urban centre and existing communities, and to increase the area's overall accessibility by public transport, as well as to ensure that development occurs in a sustainable manner. Further work will be required to determine the exact requirements at the detailed design stage, but should reflect principles including:

- easy, step-free interchange between taxis, buses, train and underground, with clearly marked pedestrian crossings where necessary;
- buses which are easily visible to passengers leaving the station, with clearly signposted routes; and
- additional bus stands in the vicinity of the interchange.

Taxis and private vehicles

7.6.7 A taxi rank should be provided within the station interchange space and step-free access between the taxi rank and the station building should be

developed to assist the flow of movement for all users, particularly those with mobility impairments. A kiss-and-ride pick-up and drop-off point may also be included in the interchange area.

Landscape design

7.6.8 The station interchange should be developed using a mixture of high quality, hard and soft landscaping to produce a good quality public space and easy interchange, and to create a sense of identity and cohesiveness. Where possible, structures, (such as bus shelters), or planting should be used to screen the station square from the traffic on Watermead Way in particular, and clutter should be avoided, to create a spacious and open ambience in the square.

Car-parking

7.6.9 Measures to reduce car-use will be required, as expressed in the General Development Principles Chapter. Car-free development will be supported in this location, however, an appropriate number of parking spaces must be provided for Blue-Badge holders.

Sustainability

7.6.10 Development should include measures to conserve energy, materials, water and other resources. Designs must make the most of natural systems, both within and around the building, reduce the impacts of noise, pollution and micro-climatic effects and the impact on flooding, ensure that the development is comfortable and secure for users and conserve and enhance the natural environment, particularly in relation to biodiversity. All buildings will be designed to incorporate energy-efficient fabric and systems.



- Pedestrian routes and road crossings
- Vehicle drop-off/kiss 'n' ride
- Train station/bus shelters and internal concourse areas
- Bus stops
- Bus lay-over
- Taxi rank area

Fig 29 Illustrative movements around the interchange

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