

DJR/DP3752

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Dear Sirs,

**HARINGEY LOCAL PLAN PREFERRED OPTIONS CONSULTATION:
TOTTENHAM AREA ACTION PLAN,
HARINGEY LOCAL PLAN, DEVELOPMENT MANAGEMENT POLICIES, AND
HARINGEY LOCAL PLAN, SITE ALLOCATIONS DPD.**

1. On behalf of Tottenham Hotspur Football and Athletic Co Ltd (“THFC”) please find enclosed written representations in response to the following documents that form part of the Haringey Local Plan comprising:
 - Tottenham Area Action Plan, February 2015;
 - Development Management Policies, February 2015; and
 - Site Allocations DPD, February 2015.
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 Council”), the Greater London Authority (GLA) and the local community in delivering sustainable regeneration in Tottenham.

Context to the Representations

3. THFC’s commitment to creating a new stadium in its current location has culminated in the Northumberland Development Project (“NDP”) which covers the area bounded by Northumberland Park to the north; Worcester Avenue to the east; Park Lane to the south; and the High Road to the west.
4. The NDP confirms THFC’s commitment to remain in Tottenham and is a significant catalyst for the wider regeneration of the area. In addition to a new stadium for THFC, the NDP will deliver a range of uses that would support the wider regeneration of Tottenham, with planning permission already secured for the following development:
 - a modern, state of the art stadium with a capacity of 56,500;
 - 285 new homes;
 - 11’000m² of educational use occupied by the Tottenham University Technical College opened in 2014;
 - A 7,200m² (net sales) supermarket which J. Sainsbury opened in 2013;
 - 3,055m² of commercial offices;



- 2,400m² of leisure uses in the southern development;
 - Club shop and museum; and
 - new public realm.
5. An important milestone in the delivery of the new stadium and surrounding development has recently been achieved with THFC, in partnership with the Council, now able to proceed with the acquisition of all the relevant land and interests required to deliver the development. THFC is currently working with the Council, the GLA and English Heritage to ensure that the NDP development best meets the needs and aspirations of all key stakeholders, and optimises the regeneration benefits for Tottenham and Haringey.
6. The NDP represents an investment of over £400m and its scale, proposed uses and location means it is of significant importance not just within North Tottenham, but within Greater London as a whole. It is against this background in which THFC's representations to the draft policy documents are made.

TOTTENHAM AREA ACTION PLAN, PREFERRED OPTION CONSULTATION

Tottenham's Vision (Page 23)

7. THFC fully supports the future vision for Tottenham, which envisages transformational change unlocking Tottenham's potential as an increasingly attractive place to live, work, study and visit, and a neighbourhood that fully benefits from London's growth and position as a world city.
8. The Club's proposals for the NDP, which are already being implemented, will help to deliver each facet of the vision for Tottenham and the underlying objectives, as outlined below:
- *Objective 1: World class education and training* - the first phase of the NDP development has already delivered a state of the art university technology college in the form of the Tottenham UTC. The UTC is a specialist further education establishment specialising in technology and science for sport, health and engineering. The recently opened UTC provides world class education and training opportunities for the young people within the Tottenham area.
 - *Objective 2: Improved access to jobs and business opportunities* - the NDP development already has, and will deliver, a very substantial number of new job and business opportunities. The fully trading Sainsburys store, the Tottenham UTC have already delivered new jobs to the area, and the construction of this first phase of development created construction jobs and spin off benefits for existing local businesses. The remainder of the NDP project will deliver further substantial new jobs, with the increase in stadium related facilities and commercial and social and community uses within the Southern Development phase creating new employment and business generating opportunities to support Tottenham's prosperity and economy.
 - *Objective 3: A different kind of housing* - the Southern Residential phase of the NDP scheme will deliver high quality new housing opportunities within Tottenham that will provide a step change in the quality of housing available locally.
 - *Objective 4: A fully connected community with even better transport links*- the NDP proposals will provide for new and improved east-west connections across the site, helping to integrate the Northumberland Park residential community in the east with the High Road to the west and the White Hart Lane railway station.



- *Objective 5: A strong and healthy community* – the Southern Development phase of the NDP scheme provides for a substantial quantum of new health centre and health club uses that will greatly enhance access to health and social services for local residents.
 - *Objective 6: Great places* – the new stadium proposals provide for a significant increase in the quality and quantum of public realm surrounding the new football stadium, including proposals to enhance and repair Tottenham High Road, along with sensitive interventions to historic assets.
 - *Objective 7: A right investment and high quality development* – the NDP proposals represent an investment of around £400m of private finance, not including the spin-off investment generated by the proposed development that will benefit the local economy.
9. As demonstrated above, THFC's NDP proposals are at the heart of the vision for the regeneration of Tottenham, and the delivery of the first phase of development has provided the catalyst to unlock Tottenham's regeneration. Therefore, it is imperative to the success of the regeneration of Tottenham, as envisaged in the AAP, that the policy framework within the AAP is supportive of THFC's regeneration strategy.

Policy AAP2 Housing (Page 34)

10. THFC fully support the policy to deliver 10,000 new homes across Tottenham. However, it is requested that Policy AAP2 (A) is amended to state that "the Council will seek the delivery of a minimum of 10,000 homes...". This will be consistent with the AAP Objective 4 set out in Section 6.
11. THFC fully supports Policy AAP2 (C) that supports higher density housing in locations close to town centres, in areas with good local facilities and amenities and in areas well served by public transport.

High Road West - Urban Realm Improvements – New Public Square (Page 67)

12. THFC support the proposals within High Road West to 'provide a clear route for visitors to match and event days at Tottenham Hotspur Football Club arriving at a new White Hart Lane station entrance'.
13. The importance of creating this link should reflect the scale of ambition proposed for the regeneration of the High Road West area and highlight the importance of this connection in shaping future development proposals within the area. It is THFC's view, however, that the any such route / boulevard should run directly from the new station entrance to the western entrance of the new football stadium. The stadium is going to be a world class building and will be the key landmark in the area that defines arrival in Tottenham. Providing a direct route will assist with wayfinding and legibility, and help to repair the current problems of connectivity and legibility in the area.
14. The policy guidance relating to the 'new public square' in High Road West should recognise the role and function of the public space provided within the podium of the new stadium development, and ensure that any new square is complementary to the consented public space at the stadium.

High Road West - Infrastructure – (Page 67)



15. THFC fully supports policy for the provision of new leisure facilities associated with the redevelopment of the new stadium. However, the policy should be amended to allow for other social and community infrastructure to be accommodated within the stadium development such as library, education, health care and pharmacy uses. This will reflect the extant planning permissions for the site, which have partly been implemented, that already provide for D1 and D2 use classes.

NT5: Tottenham Hotspur Stadium (Page 78)

16. THFC supports the range of proposed uses set out in the site designation for the Tottenham Hotspur Stadium site at Policy NT5; however, the range of supported uses needs to be expanded to include retail (A1-A5) uses. The extant planning permission (HGY/2010/1000) allows for the delivery of retail and food and drink uses as part of the Phase 2 development, which has yet to be implemented. The site designation should reflect the range of uses permissible under the extant planning permission.
17. THFC is supportive of the key development principles set out in the draft AAP policy in the event that a new planning application is forthcoming on the site. In particular, given the wider policy objectives to increase housing delivery both at the local Tottenham level and the London-wide level, the support to increase the level of residential accommodation on site, from the currently consented quantum of 285 units, is fully supported by THFC.

HARINGEY'S LOCAL PLAN, SITE ALLOCATIONS DPD

Safeguarded Waste Sites – SA4

18. THFC owns No.44 White Hart Lane, which is identified in Policy SA4 as a safeguarded waste site. THFC intends to use this site to facilitate the construction of its stadium and the wider NDP development. Subject to a subsequent planning application, it is proposed that the site will be used for aggregate storage, concrete batching, pre-casting concrete elements for the stadium and fabricating steel for the stadium and general storage. This is essential to the delivery of the new stadium and wider NDP development. This use would only be a temporary use during the construction phase, after which it would be intended that the site would be regenerated in accordance with the High Road West site policy designation NT3 for residential-led redevelopment.
19. The current occupiers of the site, Redcorn Limited, are vacating the site in October / November 2015 and are relocating their current vehicle dismantling business to their site at Brantwood Road. In effect, the relocation of the business will not result in any net reduction in the processing of waste on the basis that its existing business operations will be relocated in its entirety.
20. Notwithstanding the above, whilst the waste license identifies an indicative waste capacity of the site of 74,999 tonnes / annum, over the years 2006-2010, the average quantum of waste handled by the site was only 10,598 tonnes per annum (source: North London Waste Plan – Data Study).
21. THFC objects to the safeguarding of this site as a waste site and requests that it be deleted from the schedule at Policy SA4. In summary, the existing waste operator is vacating the site and relocating to alternative premises so overall waste capacity will not be reduced.



22. THFC are willing to work with the Council on this matter during the next stage of policy formulation given that site's context from a waste perspective will change prior to the formal adoption of the Site Allocations DPD.

HARINGEY'S LOCAL PLAN, DEVELOPMENT MANAGEMENT DPD

Policy DM3: Privacy and protection from overlooking

23. The requirement for no less than 20m between facing 1st floor habitable room windows of neighbouring homes is too onerous in high density and urban locations. It possible to secure high quality development, that provides acceptable privacy and protection from overlooking at first floor level, at a shorter distance than 20m. The policy should be amended to provide a degree of flexibility that allows schemes to respond to their context, rather than setting a single standard to be applied mechanistically.
24. THFC request that the wording of the policy is amended to state "...including a distance of no less than 16m - 20m between facing 1st floor habitable room windows of neighbouring homes, subject to site context."

Policy DM5: Siting and design of tall buildings

25. THFC supports the general thrust of the tall buildings policy, which identifies the NDP site as an appropriate location to accommodate taller buildings. However, Map 2.2 that forms part of the policy and identifies the areas where taller buildings are to be located is too definitive. The plan should be amended to show less clearly defined locations where taller buildings are acceptable. The policy and Map should provide sufficient flexibility to enable the exact location of taller buildings to be defined through site analysis and careful design, in accordance with the policy requirements set out in part (B) of the policy.
26. By way of example, at the NDP site the Map currently differentiates between the proposed location of the consented new football stadium and the Southern Residential development immediately to the south of the new stadium. The rationale for the current design of the residential blocks is that the taller elements of the Southern Residential development are intended to provide a transition in height from the new stadium down to the heights of the existing development in the neighbouring area. In the event that the residential development to the south of the new stadium is redesigned and the quantum of residential is increased, as supported by Site Policy NT5 in the Tottenham Area Action Plan, the application of the current Map 2.2 is likely to prohibit any increase in height of the consented buildings, even though such an increase could satisfy the criteria in part (B) of the policy.
27. In summary, THFC supports the broad locations shown on Map 2.2 at which taller buildings will be acceptable, but requests that the Map be amended to be less definitive on the boundaries of the plan designations.

DM12: Management of the historic environment

28. Policy DM12 broadly accords with the relevant policies of the National Planning Policy Framework (NPPF) in the context of the policy tests required to justify the substantial harm to heritage assets. It is noted that where substantial harm is proposed to a heritage asset, the NPPF at paragraph 133 states that this will only be allowed where the harm is necessary and will be outweighed by substantial public benefits. The proposed Policy DM12 seeks to reflect the NPPF policy in this regard, which THFC raises no objection to, however, it is requested that



the policy be amended to highlight that affordable housing is only one such public benefit that may be taken in to account. It is requested that the part (B)(b) of the policy be reworded to state: "...or public benefit such as, but not limited to, affordable housing opportunities, which outweigh the significant loss;"

Policy DM13: Heritage led regeneration

29. THFC supports Policy DM13 that encourages the utilisation of heritage assets as a catalyst for regeneration of a wider

Policy DM17: Housing Mix

30. THFC supports recognition in Policy DM17 part (c) that residential schemes comprising only 1 and 2 bedroom units can be acceptable if they are part of larger developments or within neighbourhoods where such provision would help to address existing imbalances with regard to housing choice.

Policy DM48 Safeguarding employment land and sites

31. THFC is committed to creating local employment opportunities and strengthening the local economy, with its NDP scheme creating hundreds of new jobs for the local area. However, THFC does not support the principle of Policy DM48 as currently drafted.
32. Part (B) of Policy DM48 seeks to protect all employment land that does not fall within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, in accordance with Local Plan Policy SP8.
33. The current drafting of the policy, when taken as a whole, has the effect of affording the same degree of protection to non-designated employment floorspace and sites (part B) as designated employment floorspace and sites (part A) i.e. the employment use will be protected, which clearly must not be the policy's intention.
34. It is not reasonable to seek to provide a blanket protection on all non-designated employment land within the Borough as this fails to take account of those sites where the loss of an employment use to a more sensitive use is desirable. Part B of the policy needs to be redrafted to provide some exception tests where it would be acceptable to support the loss of an employment use.
35. Saved UDP Policy EMP4 provides reasonable exception tests that could be added to part B of Policy DM48 to this effect. Set out below is suggested wording for a revised part B to policy DM48:

B. Outside of these areas, the Council will seek to retain in employment use any non-designated employment floorspace and sites and planning permission will only be granted to redevelop or change the use of non-designated employment land and floorspace provided:

a) the land or building is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term;
and



b) there is well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or

c) the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits.

CONCLUSION

36. These representations provide THFC's comments on the various draft Haringey Local Plan and Tottenham Area Action Plan documents. THFC is supportive of the focus on regeneration within Tottenham and the recognition that the area can accommodate transformational change over the coming years. However, THFC is keen that emerging policy is not overly prescriptive and provides sufficient flexibility to allow high quality development to be delivered that will assist with delivering the vision for both Tottenham and the borough as a whole.
37. THFC and its advisors would be happy to meet with Officers to expand upon these representations to inform the next round of consultation.

Yours faithfully,

DP9 Ltd.

DP9 Ltd on behalf of Tottenham Hotspur Football and Athletic Co Ltd