

Tottenham Business Group

Chairman Alex Tryfonos Vice Chairs Patricia Percy Lia-Clera Gomes

tottenhambusinessgroup@yahoo.co.uk

Twitter – TottenhamBnessG

Tuesday 24th March

**Planning Policy
London Borough of Haringey
6th Floor, River Park House
Wood Green
London
N22 8HQ**

BY E MAIL AND BY POST

Dear sirs

Local Plan Consultation Monday February 9th to Friday March 27th

This submission is made on behalf of the Tottenham Business Group whose members together own a considerable¹ part of the site identified for redevelopment as site NT3: High Road West Detailed comments by specific reference to this and other documents are appendages to this letter. We also request that the local Community petition numbering 4000 plus signatures also be submitted to this consultation and discussed jointly with this submission^{2*}

As the council is well aware we have strenuously objected to the demolition of the High Road shops and the Peacock Estate Industrial Estate and will continue to oppose the plans as long as necessary to protect our rights and interests.

Whilst this representation focuses on aims for North Tottenham and in particular NT3 High Road West it must contain the concerns applying to NT2 Tottenham Hotspur Stadium as the one results in the devastating impacts on local businesses in the other. These matters have not been addressed in the Scoping Reports or in the relevant evidence base.

It is clear that these impacts on local residents and on our businesses are largely to satisfy the requirements of Tottenham Hotspur Football Club for a more prestigious entrance and approach to their new stadium.

The inspectors Report on the initial CPO on the Archway Metal Company's land

¹ Peacock Industrial Est./ High Road and White Hart Lane businesses

² Petition submitted to council cabinet 28th November 2013

expressed the view that no Community benefit would derive directly from the current THFC stadium development. It is entirely foreseeable that there will be further applications from THFC for the purpose of maximizing their commercial benefits from the stadium scheme.

The DPDs need to ensure that the interests of sustainable development and public well being are protected and promoted in relation to such applications in accordance with the relevant guidance in the NPPF particularly paragraphs 14,117,47, and 156. Against this guidance the stadium scheme is already sub optimal in its paltry regeneration benefits and the heritage and community impacts it will cause.

The Tottenham Hotspur scheme does not get anywhere near the level of regeneration and public benefit delivered for example by the Arsenal scheme. If the Allocations and Tottenham Area Action Plans proceed on the present Tottenham model they will be failing to protect and support the interests of not only our local businesses but the present and future residents of the borough

We therefore urge the Council to adopt a legally compliant and more sustainable approach to the current plans so as to ensure they make positive contributions to the needs of the HRW businesses rather than sacrificing them to the commercial aspirations of a successful football club and its wealthy owners.

**For and on behalf of
The Tottenham Business Group**

Patricia Percy

Vice Chair

Detailed representations on

Site Allocations DPDs,
Tottenham Area Action Plan (Preferred Option)
Haringey's Local Plan (Alterations to Strategic Policies)
Development Management DPD

In general the consultation documents are inaccessible to the average stakeholder being largely available exclusively on line. They are lacking in clarity and organization with key diagrams unreadable. There has been little advertisement of the process and poor information. Only one public meeting was held to our knowledge.

1.Lack of Reasonable alternatives

The statutory examination of the Allocations DPD and the AREA Action plans for Tottenham must consider whether, in accordance with paragraph 182 of the NPPF it is "justified" in the sense that this scheme is the "most appropriate when considered against the more reasonable alternatives, based on proportionate evidence"
The evidence available as to the needs of the London Borough of Haringey as outlined in the documents now out for consultation do not support a strategy based on a stadium scheme. A scheme, which delivers such paltry benefits against the tremendous adverse effects for established local business. The documents currently out for consultation are seriously flawed in many ways.

It is surprising that the Scoping Reports for both the Allocations DPD and The Area Action Plans provide no information as to "reasonable alternatives" to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that 'sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment, economic and social factors.

The continual representations of the Tottenham Business Group to the Council Cabinet and the basis of its local community petition of 28th November 2013 was to request public consideration of reasonable alternatives to the devastating local impact of the level of demolitions currently proposed.

The response from Cabinet was to promise to look at ways of providing alternatives to demolition, but this was never delivered to the community.

2. Key decisions in the AAP do not appear to have gone through a pre planning stage or draw from any evidence base

2.1 The Consultation Document states that the THFC has the potential to transform the area into a sports and leisure destination (5.15) The THFC scheme was already in the pipeline. This objective was not the focus of the recent CPO case. A development in the pipeline does not justify the AAP being prepared on the back of it or adopting it as if it was set in stone. If aspirations for the area have changed such as the council now

thinks it should be a sport and leisure area then that in itself should be tested through Consultation and not presented as a fait accompli.

The Employment Land Study was not revisited until 2015 Therefore the reallocation of the land had already been decided and key land decisions taken which are not supported by the evidence

The issues and Options stage has not been pursued. This is a fundamental obstacle to a sound or just planning stage.

The issues and Options stage should have given to the existing community the opportunity to influence the terms in which the AAP is drafted rather than given a document prepared by others. The community has been asked NOT what their aspirations are for the area but RATHER to comment on the Council's aspirations. There is a fundamental difference.

The role of the existing residents and business community is excluded from the AAP process and indeed they are defined as a problem to be dealt with by decanting, dilution and removal. This significant social engineering and its impacts should be identified in the issues and challenges and specifically identified for assessment and appraisal as well as an issue for proper evaluation, debate, and wider discussion in considering appropriate options and issues before deciding the most appropriate policies for the plan in question.

Area Action plans for North Tottenham must consider whether, in accordance with paragraph 182 of the NPPF it is "justified" in the sense that it is the "most appropriate when considered against the more reasonable alternatives, based on proportionate evidence"

The evidence as to the needs of the London Borough of Haringey as outlined in the documents now out for consultation does not support a strategy based on a stadium scheme which delivers relatively paltry benefits* against the tremendous adverse effects for established local business. (Strategic Objective 6 -3,14)

The Scoping Reports for both the Allocations DPD and The Area Action Plans again provide no information as to "reasonable alternatives" to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that 'sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment, economic and social factors. Where is the process that decided North Tottenham should be the premier leisure destination?

3 The Draft Site application (NT3) did not consider the merits of alternative schemes and is based solely on the scheme being promoted by THFC.

3.1 NT2 and NT3 have to be considered together due to the functional relationship between the two. NT3 is inherently linked to the stadium by virtue of the fact that access to the stadium is through the site NT3. It has been misleading to separate the two. NT3 is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. Despite local proposals involving modest changes to allow local business to remain no alternatives have been considered as alternatives to extensive demolition.

This is a profoundly flawed methodology and an unsound basis for land use allocations within site allocations DPD under part 2 of the Planning and Compulsory Purchase Act 2004 (as amended), the regulations, and the NPPF

3.2 NT2 was based on the NDP scheme and did not capture enhanced benefits from different options

The draft site allocation NT2 was based on the NDP scheme promoted by THFC. Permissions were granted on the basis of planning policies contained in the UDP, which have been withdrawn. It makes no sense to perpetuate developments based on a former planning regime when new more sustainable policies have been prepared which secure more sustainable planning outcomes than were achievable under expired policies

There are a number of schemes/alternatives that are significantly better than the NDP scheme but the site allocation is not flexible enough to capture these enhanced benefits from different options

The proposed scheme would not significantly improve the economic and social wellbeing of the area. It was made clear in the recent CPO inquiry that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in more appropriate regeneration and environmental purposes

The site was allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry. This was surely putting the cart before the horse. It should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This surely is unlawful and unsound practice

The Draft Site Allocation again did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocations DPD under part 2 of the Planning and Compulsory Purchase Act 2004(as amended), the regulations and the NPPF

4 Key recommendations in the evidence base are not reflected in Policies and Objectives

4.1 Protection and replacement of Employment land.

**Haringey has an obligation to understand and provide support for its economy
Locally significant employment sites in particular High Road West (RA9) have been removed despite their strengths and against evidence in the Employment Land Study
5.51 “HRW is described as a locally significant site providing a range of B2 uses. It is recognized as well occupied, actively marketed with good internal circulation and parking on site.”**

**It is viewed as important as safeguarding B2/B8 uses and recommended as vital that
“any B class use jobs affected are either relocated to ne suitable premises or to existing employment sites that have potential for further intensification”**

Current plans show more floor space lost in B class use where evidence (5.136) shows a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak

7.19 Recommends that any release of employment land should not be to the detriment of successful B2/B8 businesses.

The promise of replacing and resituating displaced sites to protect B 2/B8 uses has not been carried through to the policy.

4.2 Employment in locally significant sites.

Haringey's Local Plan Alterations to Strategic Policies pledges to protect industrial land 'even when non designated' (SP8)

However the forecast demand has been reduced to just 32,000 m2 up to 2026

The Employment Land Study (5.1.21) predicts a total requirement of 137,000m2, which included a net reduction in demand.

This indicates the predicted increased jobs (5.1.18) will not be matched an increase in workspace

Development Management DPD (Policy DM48) pledges a safeguard for employment in locally significant sites

Policy DM49 (5.120) states all proposals need to demonstrate that new uses will not prejudice the continuation of existing industrial and business activities.

These policies have not been sustained in High Road West proposals and the evidence in the Employment Land Study is ignored.

Strategic Policy (DM52) as expressed in paragraph 5.26 is not in line with the NPPF guidelines, which states employment land, should not be protected where there is NO PROSPECT of it being used.

Political pledges made during initial consultations on the Regeneration promised to improve local employment and provide more opportunities for youth training and apprenticeships. This has not been followed through in Policy DM57 but abandoned with the Council merely seeking contributions to facilitate local employment and training

Many small shops, businesses and affordable industrial workspace will be displaced in regard to High Road West and yet there is nothing in this document that addresses that scenario.

There is no vision for the economic future

5 Recommendations and Strategies in the Area Action Plan are not carried through in policies and conflict with the evidence base

5.1 The description of the economy (2.14/2.15/2.16) demonstrates a shocking misunderstanding of the existing Tottenham Economy. There is no reference to an evidence base. Where is the evidence base and when was it carried out? Why is it not included in the evidence base consultation documents?

5.2 AAP 5 deals with changes to designated employment areas. All designated employment should be listed. The high density of housing will restrict employment

space. There is no provision of industrial use contrary to the recommendations in the evidence base (7.19 Employment Land Study)

5.3 These proposals (2.19 /2.20) on employment were particularly stressed and a key focus during public consultations. However they are not followed through into any policies (example DM 57)

5.4 Strategic Objective 2 shows no commitment to celebrating existing local strengths. Intensification of employment workspace makes the recommended protection of existing B2/B8 uses (particularly in High Road West) untenable.

5.5 No consideration has been given to small businesses. Existing small businesses do not have a role. This conflicts with recommendations in the evidence base (Retail and Town Centres study):

“Local shopping Centres will continue to be supported in providing core local shopping facilities and services. for their prospective local communities”

Current proposals for High Road West will constrict rather than strengthen the High Road. Retail offer will be limited to a visitor economy rather than a residential community.

Core local shopping for the existing community (particularly specialist ethnic) will be virtually eliminated