

Proof of Evidence of
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Tottenham Hotspur Football Club

On behalf of
Canvax Limited, Goodsyard Tottenham Limited,
Meldene Limited, Tottenham Hotspur Stadium Limited,
Paxton17 Limited, Stardare Limited and
High Road West (Tottenham) Limited.

The London Borough of Haringey
(High Road West Phase A)
Compulsory Purchase Order 2023



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1. Qualifications and Experience

- 1.1 My name is Richard Antony Serra. I hold a Bachelor of Science Degree (with Honours) in Building Management (Design and Construction) from Northumbria University and a Post-graduate Diploma in Surveying from the University College of Estate Management, Reading. I am a member of the Royal Institution of Chartered Surveyors (RICS) and qualified in 2001. I am also a member of the Royal Town Planning Institute (RTPI) and qualified in 2006.
- 1.2 I have over 30 years' experience in planning, development and regeneration in both the public and private sectors. Prior to joining Tottenham Hotspur Football Club, I acted as a planning consultant to private and public sector clients. In that regard, I have acted as expert witness in numerous planning and compulsory purchase inquiries.
- 1.3 I was planning consultant to Tottenham Hotspur Football Club ("THFC" or the "Club") from 2006 to 2015, when I joined the Club on a full-time basis as Head of Planning. I was promoted to Property Director in July 2022.
- 1.4 I have therefore been closely involved in THFC's planning and development activities for the past 17 years, which amongst various projects, include the development of the new Tottenham Hotspur Stadium and the Club's Training Centre in Enfield.

2. Role and Scope of Evidence

Role within THFC

- 2.1 There are two elements to my role and experience at THFC that are relevant to this inquiry.
- 2.2 First, I am responsible for overseeing all the Club's planning activities and I advise the Club Board on a variety of related property, planning, and development activities. This also includes the acquisition and disposal of property. In this regard, I work closely with the Club's Property Manager and Development Consultants.
- 2.3 Within this element of my role, I have been involved in the High Road West ("HRW") concept since its inception in 2011.
- 2.4 Secondly, I am responsible for the Club's strategic transport interests, which include transport-related planning obligations (such as the Local Area Management Plan or "LAMP") as well as the Club's relationship with its transport partners. In this regard, I work closely with the Club's Stadium Director; Head of Stadium Operations; Senior Safety Officer; Senior Security Manager; and Transport Manager. I also work closely with the Club's Strategic Transport Consultant (Mr Tim Spencer of Tim Spencer & Co.); LAMP Consultant (Mr Neil Huddart of Stadium Management); and Crowd Movement Consultant (Mr Simon Ancliffe of Movement Strategies) who is also providing evidence to this inquiry.
- 2.5 My latter role includes chairing the Tottenham Hotspur Stadium Transport Operations Group ("THSTOG"), which I established in 2019. It brings together the Club's transport partners (including the London Boroughs of Haringey and Enfield; Transport for London; London Underground; London Overground; Abellio Greater Anglia; the Metropolitan Police; and the British Transport Police) to deal with transport-related operational matters when required.
- 2.6 The THSTOG provides transport-related advice to the Safety Advisory Group ("SAG") which in turn provides specialist safety advice to the local authority in respect of the grant of safety certificates for the Tottenham Hotspur Stadium ("THS").
- 2.7 I am therefore familiar with the THS transport operation and its interrelationship with HRW, including how spectators access White Hart Lane station.

Scope of Evidence

2.8 THFC has objected to the 'London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 ("The Order") for six reasons:

1. Reason (i): The purpose for which the land is proposed to be acquired is inconsistent with the Local Plan for the area.
2. Reason (ii): The purported economic, social and environmental benefits are overstated and there is a real prospect that many will not actually be delivered.
3. Reason (iii): There is no evidence that the CPO scheme is viable and there is a real risk that it will not be delivered.
4. Reason (iv): The planning permission underlying the CPO scheme is currently subject to challenge pursuant to a claim for judicial review and, if successful, the absence of planning permission represents an impediment to delivery.
5. Reason (v): The CPO scheme will give rise to unacceptable safety impacts to visitors attending the Tottenham Hotspur Stadium.
6. Reason (vi): High Road West could be developed in an alternative way, that would be fully consistent with the Local Plan, deliver far greater economic, social and environmental benefits, and be more acceptable in safety terms.

2.9 Mr Bashforth addresses reasons (i), (ii) and (vi) in his evidence. Mr Cottage addresses reason (iii) in his evidence. Mr Ancliffe addresses reason (v) in his evidence and Ms Camburn also addresses reason (vi) in her evidence.

2.10 My evidence addresses why these issues are of such importance to the Club and the successful regeneration of North Tottenham.

2.11 I will describe the Club's historical role in the regeneration of North Tottenham and the true genesis of HRW. In that context I will explain why the "The Scheme" underpinning The Order is of such concern to the Club in respect of failing to meet longstanding and clearly defined regeneration principles and its potential impact on the ongoing operation of Tottenham Hotspur Stadium.

2.12 More specifically, the following section describes the origin of the HRW alongside the Club's decision to stay in Tottenham and invest in a new stadium.

- 2.13 In Section 4 I set out THFC's ongoing contribution to the regeneration of North Tottenham and why this is important in respect of The Scheme and The Order.
- 2.14 Section 5 describes the Tottenham Hotspur Stadium, how it functions and its contribution to the regeneration of North Tottenham.
- 2.15 Section 6 sets out the limited extent of THFC's involvement in The Scheme and why THFC believes The Scheme ignores important lessons from previous, unsuccessful attempts to regenerate North Tottenham. Section 6 also deals with the potential impact of The Scheme on the ongoing operation of THS, drawing upon the evidence of Mr Ancliffe.
- 2.16 Drawing upon the evidence of Ms Camburn, Section 7 describes how the purposes for which The Order has been made could be better met through our alternative approach.
- 2.17 Finally, Section 8 sets out a summary of my evidence and my conclusions.

3. THFC and High Road West

The Acquiring Authority's Chronology

- 3.1 Paragraphs 2.6 to 2.18 of the Statement of Reasons ("SoR") (**CD 1.4**) set out the Acquiring Authority's summary of *"how the Regeneration Scheme was developed in response to these [socio-economic] priorities."*
- 3.2 The chronology set out in the SoR (and subsequently expanded in the Acquiring Authority's Statement of Case ("SoC") (**CD 7.1**) is incomplete and I am sorry to say, misleading. In this section, I will explain why I believe that to be the case and why it matters so much.
- 3.3 The SoR begins its chronology with the 'High Road West Masterplan' and notes at paragraph 2.6 that:
- "In February 2012, the Council's Cabinet agreed that a masterplan should be prepared to guide future change in the High Road West area. The Council envisaged that the masterplan would support the creation of new homes, jobs and public space for the benefit of the community. A number of key principles for change were agreed for further consultation with the community, informed by earlier consultation and analysis of the area."*
- 3.4 Paragraphs 2.7 to 2.10 describe public consultation that took place around three options centred on the treatment of the Love Lane Estate, which culminated in the Council's Cabinet resolving in November 2013 to develop a "comprehensive masterplan".
- 3.5 Following further consultation, the Council approved the High Road West Masterplan Framework ("HRWMF") in December 2014. The HRWMF was produced for the Council by ARUP and its principal author, Ms Camburn is providing evidence to the inquiry in respect the alternative masterplan.
- 3.6 The SoR chronology then jumps to the 'Tottenham Strategic Regeneration Framework', ("SRF"), which the Council adopted in March 2014. Paragraph 2.13 notes that the SRF seeks to create 10,000 new homes and 5,000 new jobs in Tottenham over the next 20 years.
- 3.7 The SoR chronology then moves on to the Tottenham Area Action Plan ("TAAP") (**CD 3.5**) which was adopted in July 2017. Mr Bashforth addresses the TAAP in his evidence in relation to grounds (i), (ii) and (vi) of THFC's objection to The Order.

- 3.8 I do not dispute the relevance of these documents to The Order, nor that the Club was consulted with and engaged in their production. It is, however, a selective chronology with key omissions that has enabled the Acquiring Authority to justify to itself that a scheme that is 94.3%¹ residential and which contains a minimum of just 0.2%² leisure by floorspace, is consistent with the Local Plan and the genesis of the Council's own policy requirements.

The Full Chronology and its Relevance

The August 2011 Riots and THFC's Commitment to Tottenham

- 3.9 In the remainder of this section I set out the origin of the High Road West ("HRW") scheme and the Club's involvement in its conception and initial development. I consider it is crucial for the Inspector to understand the reasons behind the original vision and objectives for High Road West, which differ markedly to The Scheme now underlying The Order.
- 3.10 High Road West is intrinsically linked with the Club's proposals for its new Stadium within the Northumberland Development Project ("the NDP") (explained in more detail in my Sections 4 and 5). I therefore summarise the background to the NDP in the paragraphs below by way of context.
- 3.11 THFC was founded in 1882 and has been based in Tottenham throughout its 141-year history. The Club is strongly associated with the local area.
- 3.12 The owners of THFC set three objectives when taking over the Club in 2001:
1. Improve the First Team squad
 2. Provide a new Training Academy
 3. Construct an enlarged Stadium
- 3.13 The Club considered a number of options to enlarge its stadium. This included a planning application for an enlarged east stand over Worcester Avenue as well as a review of alternative sites in Tottenham and more widely in North London. This exercise failed to identify a suitable alternative site and in 2007 the Club resolved to focus its attention on a new mixed-use development including a world-class new stadium at its existing site known as the Northumberland Development Project ("NDP"). The Club's

¹ Para 3.12 of Mr Bashforth's Proof of Evidence

² Para 3.7 of Mr Bashforth's Proof of Evidence

aspiration (shared by the Council) was that the NDP would act as a catalyst for the wider regeneration of North Tottenham.

- 3.14 In 2010 the Club submitted applications for planning permission and associated listed building consent and conservation area consent for the NDP (attributed reference numbers HGY/2010/1000-1003 by the Council) ("the 2010 Planning Application"). The 2010 Planning Application sought consent for a 56,250 capacity stadium; supermarket; hotel; Club shop and museum; offices; and 200 residential units.
- 3.15 On 30 September 2010 the Council's Planning Committee resolved to approve the 2010 Planning Application subject to referral to the Mayor of London, the Secretary of State and completion of a Section 106 Agreement.
- 3.16 The Section 106 Agreement was completed and planning permission, listed building consent and conservation area consent granted on 20 September 2011 ("the 2011 Planning Permission").
- 3.17 Following submission of the 2010 Planning Application, the Club was invited by the Government and the Mayor of London to consider the Olympic Stadium as a potential site for its new stadium. Although preferring to remain at its historical home in Tottenham, the financial obligations in the S106 Agreement attached to the 2011 Planning Permission made the viability extremely difficult and so the Club had to consider the Olympic Stadium as an alternative.
- 3.18 The Club prepared and submitted a considered bid with its partner AEG. The Club's bid was ultimately rejected by the Olympic Park Legacy Company.
- 3.19 In August 2011, following a fatal police shooting in Tottenham Hale, riots broke out in Tottenham, which spread across London and other cities across the country. Over several nights Tottenham was subject to looting and on-street violence. Several buildings were destroyed by fire. The riots and their association with Tottenham are well documented.
- 3.20 During the course of 2011, economic and financial market conditions deteriorated – the effects of which were exacerbated by the August riots. Discussions took place between the Club, the Council and the Mayor of London to seek to identify measures to encourage investment in the area and to examine ways to improve the viability of the NDP scheme. It was during these discussions that the concept of what is now known as High Road (West) or "HRW" originated.

- 3.21 As part of this process the Club and the Council discussed revisions to the financial and affordable housing obligations enshrined in the original September 2011 S.106 Agreement. Having been through this process the Club determined that remaining in Tottenham as part of the NDP was its preferred option for a new stadium.
- 3.22 In December 2011 the Club submitted planning applications for the Northern and Southern Phases of the NDP (attributed reference numbers HGY/2010/2350 and 2351) (“the 2011 Planning Applications”). These applications proposed an increase in the quantum of commercial floorspace and residential units.

The 2012 Memorandum of Understanding the Origin of High Road West

- 3.23 This process culminated in the Club and the Council entering into a Memorandum of Understanding on 26 January 2012 (“the 2012 MoU”) (my **Appendix A**). The 2012 MoU was an urgent statement of intent in response to the riots and recognition that it would take partnership working between the public and private sectors to successfully regenerate Tottenham.
- 3.24 The 2012 MoU set out that the parties had agreed to collaborate to secure the delivery of the North Tottenham Regeneration Programme, which was defined as including both the NDP and High Road West. It set out both parties’ respective contributions and obligations towards the delivery of the North Tottenham Regeneration Programme. Under the terms of the 2012 MoU it was envisaged that THFC would prepare and submit a planning application for High Road West.
- 3.25 High Road West was intended to be delivered in two phases defined as Phase 2b and Phase 4 (Phases 1-3 were the individual NDP Phases demonstrating the linkage between NDP and High Road West). Phase 2b included the new public square and pedestrian link between High Road and White Hart Lane station, as well as hotel, retail and residential units.
- 3.26 Phase 4 included the remainder of the High Road West area for a mixed-use development including homes, retail and employment space. Even ahead of the findings of the Mayor of London’s Independent Panel on Tottenham (described in paragraphs 3.39-3.57 below) it was clear at this stage that the parties understood that High Road West would need to comprise a genuine mixed-use scheme.
- 3.27 The 2012 MoU also provided that Phase 2b (including the link between the Stadium and White Hart Lane Station) would be delivered as the first phase of High Road West. The Inspector will note this is in direct contrast to the phasing of The Scheme which envisages the equivalent Moselle Square being one of the final phases of development.

3.28 The 2012 MoU set out ten 'Transformation Principles' which included:

"expanding housing choice and supply"; "social and economic development programmes to increase educational attainment"; "job skills and opportunities for local people"; "fostering the growth of new and existing businesses in appropriate locations"; "increasing jobs"; and "sustainable development with access to new public spaces for community and cultural events".

3.29 The 2012 MoU also recorded the parties' intentions to amend the NDP S.106 Agreement financial and affordable housing obligations and also set out the terms of a £41m public sector funding package to assist with the delivery of the North Tottenham Regeneration Programme.

3.30 Upon completion of the 2012 MoU, THFC immediately made public its intention to remain in Tottenham and to commit to the delivery of its new stadium as part of the NDP. This decision was based not only on the provisions relating to NDP but equally on the proposals for High Road West; the proposed composition of the scheme; the proposed phasing; and the leading role envisaged for the Club itself in the preparation of the planning applications. The Club considered this essential to ensuring that the catalytic effects of any new stadium on the regeneration of North Tottenham would be optimised.

3.31 The Council resolved to approve the 2011 Planning Applications in February 2012 as well as to amend the terms of the NDP S.106 Agreement. The planning permissions were granted on 29 March 2012 following completion of the amended S.106 Agreement.

3.32 The North London Citizens Inquiry into the riots was launched in October 2011 to seek to understand the causes of the riots and to seek to identify a positive way forward for the area.

3.33 The Inquiry Commission's Report (December 2011) noted that the reputation and condition of Tottenham was one of the contributing factors to the riots. The report noted:

"We need to work together to improve the condition and reputation of Tottenham so it becomes a place where successful members of our community stay, a destination for Londoners to visit, live and shop and a place we can all be proud of. This means taking risks and embracing new things.....

There is great energy in the community to improve Tottenham. We want to help Tottenham become a destination for Londoners and need planning and regeneration strategies that encourage that investment” (emphasis added)

- 3.34 In 2012 the Tottenham Task Force was formed comprising representatives from the Council and Club, and other stakeholders, including the Mayor’s appointed Champion for Tottenham, Sir Stuart Lipton.

The 2012 Compulsory Purchase Order

- 3.35 In March 2012 the Council made a compulsory purchase order (“the 2012 CPO”) to facilitate land assembly necessary for the delivery of the NDP Scheme.
- 3.36 In its evidence in support of the 2012 CPO the Council set out the importance of NDP both in itself and also as a catalyst for the regeneration of the wider North Tottenham Area including High Road West.
- 3.37 In her Proof of Evidence to the 2012 CPO inquiry Lyn Garner, the Council’s then Director of Place and Sustainability, set out the Council’s position as follows (relevant extracts are attached as my **Appendix B**):

“5.41 The NDP Scheme, with its several hundred million pounds investment, will be a clear signal to other investors of substantial confidence in the area. The Phase 1 supermarket and Sainsbury’s investment in that is a very welcome start but the next crucial step is in seeing the start of construction of the new Stadium. This will lay the foundation for further ‘place making’ that is essential if the perception of North Tottenham is to be changed among ‘outsiders’ and to attract other private sector investment. For too long, private sector investors have been deterred from giving any attention to opportunities in Tottenham. That has to change for Tottenham’s sustainable regeneration. And the NDP Scheme provides the potential launchpad for that change, bringing Tottenham to the attention of, not just a national audience, but to a global audience too.

5.42 The strong leisure focus with the new Stadium will be the first phase of a wider regeneration that has an expanded leisure offer at its core – the next phase of regeneration being planned by the Council (in partnership with THFC) is the development of the ‘High Road West’ area proposed on 12 hectares immediately to the west of the NDP Scheme.

5.43 The envisaged redevelopment of the wider area is driven by ‘place-making’ with a new complementary leisure quarter and public open space immediately to the west of the Stadium forming a ‘stadium approach’ between White Hart Lane Station and the new Stadium. The remainder of the area will bring forward about 1,500 new, overwhelmingly market, homes to create a more balanced community with a higher proportion of working households and higher incomes that can then have a further multiplier effect on the local economy. That higher spending power will in turn help to change the composition of the High Road as a retail centre, attract higher quality retailers and, together with the investment of other leisure providers and the Stadium itself, will make this part of Northumberland Park a key leisure and entertainment destination. Marc Dorfman [the Council’s chief planning officer at the time] has made clear in his evidence that the Council’s planning policies already support such major new development in the Northumberland Park ‘Area of Change’. (emphasis added)

3.38 It is clear at that time the Council’s vision for HRW was for a high-quality leisure destination to complement the Club’s new Stadium and not that THS was of itself the leisure destination.

3.39 The 2012 CPO was confirmed by the Secretary of State in April 2013.

It Took Another Riot

3.40 In the immediate aftermath of the August 2011 riots, the Mayor of London appointed Sir Stuart Lipton as a champion for Tottenham and chair of an independent panel of experts to produce a report and recommendations. Several members of the panel also sat on the Tottenham Taskforce.

3.41 The concluding report was published in December 2012 and entitled It took Another Riot (“ITAR”) (**CD5.13**). Reference to “another” in the title relates to the central premise of the report, which was that “previous attempts to regenerate Tottenham have failed”. The report concludes that there was no single cause of the riot, but many interconnected causes.

3.42 The report references the report by Lord Heseltine (*It Took a Riot*) in the wake of the Toxteth disturbances in 1981. Lord Heseltine made the case for “harnessing the efforts of central government, local government and other bodies” and “the resulting efforts in

Liverpool were highly regarded". ITAR notes that by contrast, "over thirty years on, these lessons were never learned for Tottenham."

3.43 ITAR makes "ten critical recommendations:

1. *Form an independent governance*
2. *Re-imagine the built environment*
3. *New housing featuring a mix of public and private tenures*
4. *Measures to tackle population churn and overcrowding*
5. *Focus on reducing unemployment with youth training, enterprise support and the construction of uplifting new workplaces available at subsidized rents*
6. *Charities need greater co-ordination*
7. *Transport links must serve the area, not just pass through it*
8. *Improve relationships between the police and the local community*
9. *Tottenham needs more fun*
10. *Adopt the 'Troubled Families' programme"*

3.44 In partnership with the Council, the Club focused on the second and ninth critical recommendations.

3.45 However, the first critical recommendation is also of relevance:

"Interconnected problems need a coordinated response. Led by an independent, authoritative Chairman and dynamic Chief Executive, a Tottenham-based governance organisation should oversee regeneration in the area, champion joined-up government, and secure powers and funds from Whitehall. It should include a board of local experts from fields such as health, education and business."

3.46 To the best of my knowledge, the recommendation has never been implemented, meaning that there has been very limited strategic co-ordination to the regeneration of Tottenham.

3.47 The second critical recommendation states:

"New developments must be architecturally ambitious and not 'second best'. High-quality urban centres need establishing in Tottenham Hale, the Green and the area around the new Tottenham Hotspur stadium to bring new jobs and create safe, social places for locals and visitors. The number of existing shops needs to be reduced to concentrate footfall and encourage high-grade retail offerings that will attract visitors. Bruce Grove should become the

dominant shopping street with some new, larger units designed to offer quality shopping at competitive prices. Tottenham Green could serve as a cultural heart, with restaurants, bars, entertainment and civic activities.”
(emphasis added)

3.48 Through the development of the THS and the various projects listed in section four of my evidence, I believe the Club has demonstrated its adherence to this critical recommendation. The same level of architectural ambition is not evident in The Scheme, which aside from a limited first phase, is entirely in outline.

3.49 In an attempt to address this, THFC’s alternative masterplan seeks to introduce another architecturally ambitious building within HRW through the new multi-purpose cultural venue.

3.50 The second critical recommendation also deals with housing and notes:

“Housing ranks toward the top of Tottenham’s toughest challenges, with extremely high concentrations of social housing, poor quality privately rented accommodation, and 25% of households experiencing overcrowding¹³. Some 60% of the council’s social housing stock is located in the N15 and N17 postcodes, and the area has one of the highest benefit claimant concentrations in the country.

For many, such high concentrations of social tenancy have contributed to a vicious circle. Social housing was never conceived to exacerbate poverty, but decades of undersupply nationally have led to increasing priority being given to families in the most challenging situations. This has concentrated poverty. Patterns such as groups of families out of work for consecutive generations create cultures that impact on life chances. Young people neither in education, employment or training are more likely to fall into crime and suffer mental illness, and a culture that places a low value on education builds in barriers to breaking this cycle.

Pockets of Tottenham have fallen into the pattern of ‘residualisation’, whereby those who are able to leave areas no longer seen as desirable do so, leaving behind those unable to move. Those who remain suffer the compounded effects of concentrated poverty, and newcomers tend to be those who cannot afford accommodation elsewhere. After a certain point, measures designed to improve the situation can have the opposite effect – those who gain new skills and employment use these attributes as a stepping stone to leave the situation, causing the cycle to repeat itself.

This cycle needs breaking. We need to prioritise the regeneration of those most severely affected pockets by rebalancing the housing tenure mix.

Even this is a challenge. With long social housing waiting lists, private rental accommodation is in high demand by newcomers to the area. Combined with a desire for the cheapest accommodation possible, the result is high levels of overcrowding. Therefore not only do landlords need to be more strongly discouraged from taking on too many tenants, there needs to be a greater proportion of owner-occupied homes in the housing mix.

The situation is further aggravated by the presence of large numbers of people in the Borough in temporary accommodation: 35 in every 1000 households in Haringey is in temporary accommodation – the highest proportion in London – with this effect further concentrated in Tottenham, occupying dwellings needed by the existing local residents.”

3.51 The Scheme that underlies The Order could be 94.3% residential with 35% affordable housing by unit (40% by habitable room), equating to 1,025 affordable homes. With the provision of 500 social rent homes (which I understand includes the re-provided social rent homes), the proportion of low cost rent to intermediate housing is approximately 50/50. In recognition of the need to rebalance the existing housing tenure in North Tottenham, the TAAP requires a low cost rent to intermediate weighting of 40/60.

3.52 The Scheme therefore runs contrary to the second critical recommendation of ITAR in respect of housing tenure mix.

3.53 The ninth critical recommendation states:

“Tottenham lacks recreational pursuits, especially for the young. The council should encourage private operators to open facilities such as cinemas, music venues or a theatre, and work with charities, schools and those running civic buildings to encourage free activities on existing premises.” (emphasis added)

3.54 This critical recommendation is also picked up in *A Plan for Tottenham (CD5.14)* which was produced by the Council in parallel with ITAR and is described in paragraphs 3.58-3.66 below. It is *A Plan for Tottenham* that first introduces the phrase and variations on it, of “*new premier leisure destination*”, which is then enshrined in adopted planning policy via the TAAP.

- 3.55 Only a minimum of 0.2%³ of the total floorspace within The Scheme is given over to leisure and sports uses.
- 3.56 ITAR identifies that *“unemployment is the single biggest local issue, with Tottenham suffering some of the highest levels in London.”*
- 3.57 Paragraph 12.4.1.1 of the Socio-Economic Chapter of the Environmental Statement for the Order Scheme advises that the site (i.e. whole application site boundary rather than just the Order land) provides 690 FTE jobs.
- 3.58 Table 14.19 of the Environmental Statement sets out a purported “worst case” masterplan, albeit including 3,161m² of B8 industrial floorspace that is not actually authorised by the Order Scheme planning permission.
- 3.59 Table 14.21 estimates that the Order Scheme could support 392 FTE jobs on-site, which would result in a net loss of 298 jobs across HRW. If 45 jobs created by the (unconsented) B8 industrial use are deducted, the net loss rises to 343 FTE jobs.

A Plan for Tottenham

- 3.60 In partnership with the Tottenham Taskforce, the Council launched *A Plan for Tottenham* (date) (CD 5.14). The purpose of the plan was to set out the Council’s ambitions and overall vision for Tottenham in response to the riots.
- 3.61 A key objective of *A Plan for Tottenham* was to:
- “transform Northumberland Park into a premier location for leisure activities, high quality housing, increased employment opportunities for local residents, improved public space and better transport options”* (emphasis added)
- 3.62 *A Plan for Tottenham* identifies the ‘Tottenham Hotspur Football Club development’ and ‘[White Hart Lane] ‘Station approach’ within a wider ‘Northumberland Park Opportunity area’.
- 3.63 It goes on to specify that *“by 2025, there will be:*
- *Up to 10,000 new high quality homes*
 - *Over 5,000 new jobs created or accessed with almost a million square feet of employment and commercial space added*

³ Paragraph 3.7 of Mr Bashforth’s Proof of Evidence

- A new leisure destination in Northumberland Park, serviced by a new White Hart Lane station and improved public realm that enhances the local high street and becomes a genuine year round destination
- A new civic hub and excellent open space at Tottenham Green
- A new gateway to Seven Sisters
- A revamped station at Tottenham Hale, suitable for an international transport and growth hub” (emphasis added)

3.64 At page 10, the document notes that:

“In February 2012, the Council’s Planning Committee unanimously approved Tottenham Hotspur Football Club’s plans to invest £430m in a new stadium led development scheme in Northumberland Park. This facility will bring in over a million visitors a year to the area and is the first phase of ambitious plans to transform Northumberland Park into a leisure destination for north London, creating thousands of new jobs and homes.” (emphasis added)

3.65 At page 12, the document notes that:

“Northumberland Park – through a new master plan and investment framework for the area we will encourage the development of a mixed use leisure destination, including new housing choices and transport infrastructure improvements.” (emphasis added)

3.66 At page 14, the document notes that:

“In order to deliver these outcomes we have developed a clear, five point plan for change through to 2025.

Working with residents, businesses and investors, we will:

1. Transform Northumberland Park into north London’s premier leisure destination with new high quality housing and improved transport options
2. Create a fun, civic heart at Tottenham Green and turn Seven Sisters into an impressive gateway into Tottenham

3. *Promote Tottenham Hale as a new centre for growth, exploiting excellent transport connections*
4. *Consolidate and revitalise the retail experience on the High Road*
5. *Improve the quality of life for everyone – encourage investment, jobs, economic growth, quality housing and strong neighbourhoods”*
(emphasis added)

3.67 At the risk of labouring the point, the emphasis on Northumberland Park (identified as the land containing both NDP and HRW) becoming a premier leisure destination that contains high quality housing and employment opportunities is made very clear throughout *A Plan for Tottenham* as is the aspiration that the ‘Spurs stadium’ will be a catalyst for wider area change.

3.68 I would invite the Inspector to note this terminology when considering the TAAP and the evidence of Mr Bashforth.

The 2013 Memorandum of Understanding

3.69 In January 2013 the Club and the Council entered into a revised Memorandum of Understanding (“the 2013 MoU”) (my **Appendix C**). The 2013 MoU reiterated the parties’ commitment to the North Tottenham Regeneration Project and again defined High Road West as Phase 4 as well as restating the “Transformation Principles” set out in the 2012 MoU.

3.70 Under the terms of the 2013 MoU the Council agreed (subject to consultation) to support the early delivery of the new public boulevard and square linking the Stadium with White Hart Lane station (para 7.4) and again to work with THFC and the GLA to agree a mutually acceptable delivery structure for Phase 4 (now High Road West) (para 7.5).

3.71 In turn the Council agreed to work with THFC in the preparation of a planning strategy for the public boulevard and in turn to work with THFC and others to prepare an agreed masterplan leading to a planning strategy and ultimately a planning application for the remainder of Phase 4 in accordance with the Transformation Principles.

3.72 Following signing of the 2013 MoU, the Club continued to deliver on its commitments. In the following section, I describe what projects the Club has completed in light of its commitments in the MoU and their contribution to the regeneration of North Tottenham. I address the delivery of the Tottenham Hotspur Stadium in Section 5 and

explain how the Club sought to work with the Council to facilitate the delivery of High Road West in accordance with the original objectives.

The High Road West Masterplan Framework

- 3.73 This led to the appointment of Arup in 2013 to prepare a Masterplan for High Road West (the “HRWMF”) (**CD 3.6**), which was adopted by the Council in December 2014.
- 3.74 The Acquiring Authority’s (“AA”) SoC rightly notes at paragraphs 3.37-3.39 that THFC engaged with and supported the general approach of the HRWMF. That is still the case and the HRWMF has guided the HRW schemes brought forward by the Club within HRW (as set out in section four of my evidence).
- 3.75 Mr Bashforth deals with The Scheme and the degree to which it complies with the HRWMF in his evidence.

Tottenham Area Action Plan

- 3.76 In turn the Council brought forward and adopted supporting planning policy to underpin the regeneration of Tottenham (including High Road West) through the Tottenham Area Action Plan (adopted in July 2017) (**CD 3.5**).
- 3.77 The contents and requirements of the TAAP are addressed in the evidence of Mr Bashforth but in summary they enshrined the following principles.
- 3.78 The Club and the Council continued to discuss the composition and delivery options for HRW in accordance with the proposals set out in both the MoUs. The Club had anticipated based on the history of discussions above (and in part due to its landholdings within the High Road West area) that it would play a prominent role in the development of the High Road West scheme and as the Council’s delivery partner.
- 3.79 However, notwithstanding the commitments in the MoUs, the Council unilaterally took the decision to seek a third-party development partner pursuant to the Competitive Dialogue procedure under the Public Contract Regulations 2015. This decision was approved by the Council’s Cabinet in December 2015.
- 3.80 In my view, it is that decision that has led directly to the breakdown in co-ordination between the Council and THFC on the regeneration of North Tottenham and the abandonment of key principles within the ITAR, *A Plan for Tottenham*, the HRWMF and the TAAP within the Scheme that underlies The Order.

3.81 The procurement process eventually led to the appointment of Lendlease as the Council's chosen development partner for High Road West, which was approved by the Council's Cabinet in September 2017 (and further ratified in October 2017). In turn the Development Agreement (**CD5.5**) was signed by the Council and Lendlease in December 2017.

3.82 I set out the Club's dealings with LendLease following its appointment in Section 6 of my Proof of Evidence below.

3.83 This chronology demonstrates:

1. The original concept for what is now known as HRW was first proposed by the Club to the Council as a way to complement the delivery of the THS and wider NDP, in order to facilitate the regeneration of the wider area.
2. It was always envisaged by both parties that the Club would play a prominent role in the development of the HRW scheme and also its delivery, both due to the proximity to the THS and the NDP, but also due to the Club's landholdings within the High Road West area.
3. The vision for HRW was therefore for a genuine mixed-use development but with cultural and leisure uses at its heart to deliver a premier leisure destination for North London. This vision was a direct consequence of the work undertaken following the August 2011 riots, which recognised the need not to repeat the mistakes of the past attempts at regeneration and to make Tottenham an attractive destination for visitors.
4. It is clear from the composition of the scheme (which is 94.3% residential); the Acquiring Authority's SoR and SoC that justify the making of The Order; and all the officer reports associated with the determination of The Scheme, that for the Council, HRW is primarily about the provision of housing and in particular, social housing.
5. It was always envisaged that the first phase of HRW would include the delivery of the public boulevard/square between the Stadium and White Hart Lane Station.
6. The Club's decision to stay in Tottenham and invest over £1bn in the THS and wider NDP, was based on the assurances it was given by the Council in respect of the nature of the HRW scheme, the proposed phasing and crucially, the role the Club would be given in its delivery.

- 3.84 It is over ten years since the publication of *ITAR*. The socio-economic context to the August 2011 riots described in *ITAR* is effectively repeated at paragraph 2.2 of the SoR and 2.2 of the AA's SoC, which both note how Tottenham still remains one of the most deprived areas in the Country.
- 3.85 In that time, THFC has delivered the new THS and a raft of other developments (including the first phase of HRW) that have all contributed in various ways to the regeneration of North Tottenham. But the Club's investment alone is clearly still not enough.
- 3.86 The Scheme upon which the Order is based is not only a missed opportunity. It is far worse than that. It is predicated upon a selective interpretation of the Local Plan and with no (apparent) consideration to its genesis. By disregarding the clear recommendations following the August 2011 riots in *ITAR*, which in turn, informed *A Plan for Tottenham*; the HRWMF; and ultimately the adopted TAAP, the Acquiring Authority risks repeating the very same mistakes from failed regeneration attempts previously.

4. THFC's Contribution to the Regeneration of North Tottenham

- 4.1 The purpose of this section of my Proof of Evidence is to set out how THFC has responded to the same regeneration principles that we are inviting the Inspector to apply to The Scheme and the Order. In doing so, we are demonstrating why it is so important that those regeneration principles continue to be adhered to and not abandoned.
- 4.2 The second critical recommendation *ITAR (Re-imagine the built environment)* required new developments to be *"architecturally ambitious and not 'second best'"* and that the area around the THS must *"bring new jobs and create safe, social places for locals and visitors."*
- 4.3 The ninth critical recommendation (*Tottenham needs more fun*) identified that *"Tottenham lacks recreational pursuits, especially for the young"* and that the Council *"should encourage private operators to open facilities such as cinemas, music venues or a theatre..."*
- 4.4 Paragraph 5.85 of the TAAP (**CD 3.5**) sets out the vision for North Tottenham:

"North Tottenham will be transformed into a mixed and sustainable community and new leisure destination for London - a place where people want to live, work and visit. It will retain its diverse north London character and have a strengthened community identity. The neighbourhood will be known for its mix of urban and landscape settings, with improved access to both a busy London high street and the abundant open spaces of the Lee Valley Park. With the Tottenham Hotspur FC development scheme serving as a catalyst for wider area change, there will be a substantially improved local centre with a balanced mix of high quality homes, jobs, community and leisure facilities." (emphasis added)

- 4.5 The tables that follow describe the various schemes that THFC has brought forward (both on its own and in partnership); the various schemes that THFC has secured planning permission for and is in the process of bringing forward; and the events, partnerships and inward investment that THFC has secured in response to *ITAR*, *A Plan for Tottenham*, the HRWMF and the TAAP.
- 4.6 The following table describes the various developments carried out directly or facilitated by THFC that have contributed to the regeneration of North Tottenham so far. The location of each site is shown on the plan at **Appendix D**.

Table 4.3: THFC Completed Developments

Site	Description	Contribution	Status/Awards
Berland Court (former Park Tavern PH), Northumberland Park	Reprovision of Jehovah's Witness Kingdom Hall, in conjunction with 34 new affordable homes and a ground floor retail unit. Developed in partnership with Newlon.	Reprovision of Kingdom Hall facilitated the voluntary relocation of one of the new stadium site occupiers. The new homes added to Haringey's stock of affordable housing. The new retail unit provided ground floor animation adjacent the Northumberland Park railway station. The unit is now occupied by a Tesco Metro convenience retail store.	Completed June 2012.
Lilywhite House Northumberland Park	Mixed-use four storey building comprising (at opening) 77,000 sq.ft (net sales) supermarket; 92,830 sq.ft London Academy of Excellence Tottenham ("LAET"); and 35,28 sq.ft. of headquarter office space for THFC. Developed directly. The LAET is an academically selective 16-19 free school for 385 students, principally sponsored by Highgate School and THFC.	The introduction of a large format Sainsbury's into Tottenham provided access to a range of convenience and comparison goods that did not previously exist in the area. The store also created over 250 jobs (FTE). THFC's main administrative offices employ over 200 staff (FTE).	Sainsbury's completed November 2013. LAET completed September 2014 and awarded Best Sixth Form College of the Year 2021 by the Sunday Times Good Schools Guide. THFC Headquarters completed February 2015.
Cannon Road High Road West	Redevelopment of a derelict former rubber factory site to provide 222 new affordable homes and a two-form primary school. Developed in	Provision of a new primary school to meet acute needs for additional primary education provision. The new homes added to Haringey's stock of affordable housing.	Completed November 2015. Rivers Apartments (part of the scheme) won Best Social or Affordable New Housing Development at the regional final of

	partnership with Newlon.	The development comprised the first completed phase of High Road West.	the 2016 Local Authority Building Control (LABC) Building Excellence Awards. The school (Brook House) was also a finalist for Best Educational Building. Brook House School is now an Ofsted Outstanding Provider.
796 High Road 'Percy House' (part of Northumberland Terrace)	Renovation and extension to Grade II* listed 'Percy House' to form new headquarter offices for the Tottenham Hotspur Foundation ("THF"). Developed directly.	The scheme secured the renovation of an important heritage asset and its long-term beneficial future. More symbolically, the THF were able to relocate to a more prominent location on the High Road with better facilities from which to operate.	Completed February 2018.
Tottenham Hotspur Stadium	Redevelopment of the former White Hart Lane stadium and adjoining land to provide a new 62,000 seat football and third party event stadium, including the only National Football League (NFL) specified stadium outside the United States. Developed directly.	The purpose, operation, benefits and contribution to the regeneration of North Tottenham is set out in Section 5.	Completed March 2019. Since opening, the THS has received 28 industry awards, including the 2021 RIBA National Award.
Tottenham Experience	Renovation and extensions to Grade II listed 'Warmington House' to provide new retail, event and museum space. Developed directly.	The scheme secured the renovation of an important heritage asset and its long-term beneficial future. The extensions (recreating a 'Southern Terrace' placed the heritage asset in an appropriate architecture and urban design setting against the new stadium. Warmington House	Completed March 2019. Warmington House is the temporary home of the OOF Gallery, which is the world's first cutting-edge art space dedicated to football and the culture that surrounds it. The gallery has attracted media

		has been removed from the Historic England 'At Risk' register.	coverage in the Evening Standard, Time Out and the New York Times.
Paxton Building Paxton Place	Four storey mixed-use building of 12,885 sq.ft comprising THFC home supporters ticket office and security office on ground floor; F3 architect studios on first, second and third floors. Developed directly.	It forms the first phase of Paxton Place. F3 architects have 45 staff (FTE).	Opened March 2019 (ground floor ticket office).
500 White Hart Lane	Redevelopment of a part vacant/part former builder's merchant site to provide a 115 new private 29 affordable homes with retail and employment floorspace. Developed in partnership with Fairview.	The new homes added to Haringey's stock of market and affordable housing. The affordable units were acquired directly by Haringey Council to facilitate the relocation of residents from the Love Lane Estate.	Completed November 2020.
The Corner Pin PH Park Lane	The renovation and conversion of the Club's former ticket office to reinstate a public house – the first to be operated by Tottenham-based Beavertown Brewery. Developed directly.	The scheme brought a public house back into being on a prominent corner site opposite the new stadium. The new pub has created 50 jobs.	Completed September 2021.
792-794 High Road (Northumberland Terrace)	The renovation and change of use of two Grade II listed buildings to provide artist studio space in collaboration with Sarabande, the foundation of late fashion designer, Lee Alexander McQueen. Developed directly.	The scheme has secured the renovation of two important heritage assets and their long-term beneficial future. It has also provided a new home for creative talent in Tottenham.	Completed July 2023

4.7 The following table describes the various developments that THFC has not yet commenced, but has secured planning permission for, along with their intended contribution to the ongoing regeneration of North Tottenham. The location of each site is also shown on the plan at **Appendix D**.

Table 4.4: THFC Schemes with Extant Planning Permissions

Site	Description	Contribution	Status
Hotel Park Lane	As part of the wider NDP scheme, THFC secured full planning permission for a 24 storey 180 bed hotel, which also included 49 serviced apartments.	The hotel will make a major contribution to North Tottenham as a major new leisure destination. It will provide employment for 890 (FTE) in the construction phase and 700 (FTE) in the operational phase ⁴ . It will be the borough's first four-star hotel accommodation. Providing hotel accommodation in North Tottenham will facilitate longer dwell times and greater spending in the local area, particularly around events being held at the THS and proposed multi-functional cultural venue.	Extant and implemented full planning permission. Live S.73 application to amend. THFC submitted a S.73 application in August 2023 to amend the hotel design with the intention of completing and opening the building ahead of the European Football Championships in 2028 (THS is one of the host stadia).
Extreme Sports Building Park Lane	As part of the wider NDP scheme, THFC secured outline planning permission for a multi-purpose 'extreme sports building' of 22,604 sq.ft., which would include indoor and outdoor climbing walls and an indoor diving tank.	The Extreme Sports Building has been conceived in order to animate both Park Lane/Southern Podium and bring visitors to the area on non-Major Event Days. It would a new leisure offering that does not currently exist in London.	This element of the NDP scheme benefits from outline planning permission with all but one of the reserved matters having been approved.

⁴ Paras 14.6-14.7 of the Environmental Statement Non-Technical Statement for the Hotel S.73 application

NDP Residential Park Lane	As part of the wider NDP scheme, THFC secured outline planning permission for 585 new homes arranged across four towers, varying from 16 to 32 storeys.	This component of the NDP scheme would contribute to the Borough's housing stock, local spend in the area and the creation of additional employment opportunities.	THFC is in the process of securing the outstanding reserved matters consents and discharging conditions with a view to commencement by Q1 2025.
Goods Yard Depot High Road West	THFC received planning permission on appeal for a mixed-use scheme of 867 homes in October 2022. A slightly revised scheme comprising 844 homes (min 35% affordable housing) received a resolution to grant in July 2023. The revised scheme is compliant with the Building Safety Act 2022 requirements (including the provision of second stair cores).	The scheme would contribute to the Borough's housing stock, including a minimum of 35% affordable housing; regenerate under-utilised land; renovate two Grade II listed buildings and a locally listed building; provide new public open space; increase local spend in the area; and create additional employment opportunities.	The scheme for 867 homes was approved on appeal in October 2022. The scheme for 844 units was approved at Planning Committee in July 2023 and is pending the agreement of a S.106.
Printworks High Road West	THFC received full planning permission for a mixed-use scheme comprising a boutique cinema and 72 new homes. Following the loss of the cinema operator, THFC has revised the scheme and submitted a further planning application for 287 student accommodation units.	The original scheme would have brought a new boutique cinema to North Tottenham and contributed to the leisure offer, in addition to the benefits of new market and affordable housing. The revised scheme will provide accommodation for students in conjunction with teaching space that will bring the first higher education institution into Haringey.	The original cinema scheme was approved in August 2022. A planning application for the revised scheme was submitted in August 2023 and is expected to be determined in November. If approved, THFC intends to complete the development by January 2026 as part of a proposed deal with Middlesex University.

807 High Road	THFC received planning permission for the redevelopment of the site to provide 9 new homes and two commercial units. The scheme is being revised to provide additional student accommodation (24 units) in conjunction with the Printworks scheme.	<p>The original scheme would have added to the Borough's housing stock and provided new employment floorspace.</p> <p>The revised scheme will be developed in conjunction with the Printworks to provide new student accommodation.</p>	<p>The original scheme was approved in full on 9 September 2021.</p> <p>A planning application for the revised scheme will be submitted in November.</p>
Linear Building Paxton Place	THFC received full planning permission in April 2021 to build 35,000 sq.ft of new commercial and F&B space, along with new public realm to the rear of Northumberland Terrace.	The scheme contributes to the wider restoration of the Northumberland Terrace by providing new public realm and amenity. As part of a wider proposed deal with a leading London university, the scheme will provide teaching space for 800 students bringing the first higher education to the Borough and potential synergies with local schools, the LAET and F1.	<p>The original scheme was approved in April 2021.</p> <p>An application for change of use to facilitate the university will be submitted in November.</p>
Northumberland Tce High Road	THFC received full planning permission and listed building consent in April 2021 to refurbish, convert and extend Nos. 798-812 High Road.	Having renovated the front and rear of the terrace with grant assistance from the Council, THFC is gradually finding long term beneficial uses for each of the buildings to secure their futures and to provide a finer grain of cultural uses that will contribute to placemaking and the wider regeneration of North Tottenham.	<p>As noted in Table 4.3 above, the conversion of Grade II* Percy House into new headquarters for the Tottenham Hotspur Foundation was completed in February 2018. The conversion of Grade II listed 792-794 to provide a second site for the Sarabande foundation was completed in July 2023.</p> <p>THFC's new 'Heritage Trail', which includes a</p>

			scheme of blue plaques and information boards, was formally opened in September 2023 by Chair of Historic England, Lord Mendoza.
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4.8 The following table describes the various events, partnerships and inward investment that THFC has attracted to North Tottenham and how they too have contributed to the ongoing regeneration story.

Table 4.6: THFC Events and Initiatives

Activity	Description	Contribution	Status
NFL Games	THFC has a ten-year contract with the National Football League (“NFL”) to stage a minimum of two ‘regular season’ (i.e. competitive) games every year at the THS, which is the first purpose-built NFL stadium outside of the US.	All six games have been sell-outs attracting 360,000 visitors to North Tottenham from all over the World. The two games each year contribute circa £300m into the local economy.	Seven games* have been held at the THS with the next game taking place on 15 October 2023. The partnership has been recently extended by another year to 2030 and THS identified as the ‘Home of NFL in the UK’.
Third Party Events	In addition to association football and American football, the THS has staged a number of music concerts involving globally renowned artists (Beyonce, Guns’N’Roses, Lady Gaga); World championship boxing; Premiership rugby union; and the rugby league Challenge Cup final.	The various third-party events have brought different audiences from different parts of the World to North Tottenham.	THFC has planning permission to host up to 16 non-football Major Events each year in the THS.
‘The Skywalk & Edge’	The Skywalk is a visitor attraction that enables visitors to climb up the	Since opening in 2020, the Skywalk has attracted 115,000	The Skywalk opened in August 2020 and the Edge in June 2021.

	side of the THS and onto the roof. The Edge allows visitors to abseil down the rear of the south stand.	visitors and The Edge, nearly 20,000 since its opening in 2021. These attractions are bringing visitors to North Tottenham on non-Event days.	
'F1 Drive'	F1 Drive will be a new visitor attraction opening in Q4 2023 and comprising bespoke electric karts and London's longest indoor track.	F1 Drive is part of a 15 year partnership between THFC and Formula 1, which is intended to showcase sustainability and innovation and create apprenticeship and career opportunities for young people in the motorsport industry.	The attraction has been completed and will open in autumn/winter 2023.
Euro 2028	England, Scotland, Wales, Northern Ireland and the Republic of Ireland have submitted a joint bid to host the 2028 European Football Championships. The THS is one of the two host stadiums in London (along with Wembley Stadium).	Held every four years, the Euros is the second most watched football competition after the FIFA World Cup with the 2012 final watched by 300 million people globally. As a host stadium, the THS will raise the profile of North Tottenham and bring significant socio-economic benefits.	The joint bid is now unopposed with the winning bid being formally announced by UEFA on 10 October 2023.

*There were no games in 2020 because of the Covid pandemic

- 4.9 Attached as my **Appendix E** is *Tottenham Hotspur: An analysis of the Club's socio-economic contribution to the local area* (October 2023) produced by EY (Ernst & Young LLP). The report focuses on the 2021/22 season and analyses the socio-economic contribution of the Club's operations to Haringey; the tri-borough area of Haringey, Enfield and Waltham Forest; and London more widely.
- 4.10 In summary, the report concludes that THFC's activities generated £344m in GVA during the 2021/22 season and supported 3,700 jobs in the tri-borough area through the attraction of 1.6m visitors to the THS.

- 4.11 The report projects that by the 2026/27 season, THFC will be generating £585m in GVA and supporting 4,300 jobs in the tri-borough area.
- 4.12 THFC has contributed hundreds of new homes, thousands of new jobs and numerous education opportunities to North Tottenham over the last decade. It has invested over £1bn in a World-class new football stadium that has brought regular season NFL to Tottenham and attracted some of the World's most significant music artists, which in turn bring new audiences and associated investment into the area.
- 4.13 Through the various events that now take place at the new THS; the Skywalk and Edge attractions; and the forthcoming F1 Drive attraction, THFC has responded directly to one of the key TAAP principles of creating 'London's new premier leisure destination.'
- 4.14 The expected confirmation on 10 October that the United Kingdom and the Republic of Ireland will host the 2028 European Football Championships with the THS one of the host stadia, will further expose North Tottenham to the World.
- 4.15 The North Tottenham regeneration story however is still in its early stages. As the AA's SoR and SoC reaffirm, the majority of the socio-economic challenges that contributed to the August 2011 riots (high levels of poverty, unemployment and overcrowding; poor life expectancy and high crime rates) stubbornly remain in 2023.
- 4.16 By abandoning the key TAAP principles that have guided regeneration efforts so far and by disregarding the origins of the TAAP, The Scheme that underlies the Order will risk nullifying much of the progress and investment that has been made in North Tottenham.

5. Tottenham Hotspur Stadium

Introduction

- 5.1 In this section, I explain what the Tottenham Hotspur Stadium is; how it operates, and how it is served by public transport. This is to provide context to the evidence of Ms Camburn, Mr Bashforth and Mr Ancliffe's Proofs of Evidence.

Tottenham Hotspur Football Club

- 5.2 Tottenham Hotspur Stadium ("THS") is home stadium of Tottenham Hotspur Football Club ("THFC" or "The Club"). THFC is an association football club, which was founded in Tottenham in 1882 and has resided in area for its 141 year history. THFC currently plays in the Premier League, which is the highest division in English football.
- 5.3 In addition to the THS, THFC has a training centre which is located in the north of the London Borough of Enfield where training and medical facilities for the men's, women's and academy (junior) teams are sited.
- 5.4 THFC and its associated companies have various land interests around the THS, some of which are the subject of this Order.

The Tottenham Hotspur Stadium

- 5.5 THS staged its first competitive football match on 3 April 2019 and replaced the Club's previous stadium (White Hart Lane) which had become obsolete.
- 5.6 The stadium has a seating capacity of 62,850 making it the largest club football stadium in London and the second largest nationally after Manchester United FC's Old Trafford stadium. Approximately 3,000 staff are employed on a typical matchday across catering, stewarding and security functions. That figure includes approximately 300 (FTE) Club staff.
- 5.7 THS is regarded as one of the most technologically advanced stadiums in the World and since opening, has received 28 industry awards in the fields of architecture, accessibility, hospitality and fan experience, including the 2021 RIBA National Award.
- 5.8 The stadium features a World-first sliding pitch feature, which is at the heart of its versatility. The (grass) football pitch comprises three 3,000 tonne pallets that retract under the south stand of the stadium to reveal an artificial surface which forms the

NFL playing surface. It is the 'pitch pocket' where the retractable pitch is stored when not in use that will accommodate the F1 Drive visitor attraction.

- 5.9 The retractable pitch also enables the stadium to host a variety of third-party events, which have so far included 6 NFL games; 11 music concerts; and two World championship boxing matches. The stadium has also hosted various rugby league and rugby union matches.
- 5.10 The stadium hosts Tottenham Hotspur Women ("THW" the Club's women's first team) for higher profile fixtures. THW play in the Women's Super League, the highest division in women's football.
- 5.11 These events are classed within the THS planning permission and S.106 as Major Events, which is any event where there are more than 10,000 paying spectators.
- 5.12 The stadium is a significant conference and event venue in its own right. On non-Major Event days it typically hosts various conferences and exhibitions and is used for filming purposes.
- 5.13 The stadium is also put to non-commercial uses and plays an important civic function within Haringey and North Tottenham.
- 5.14 The Club's Tottenham Hotspur Foundation regularly holds jobs fairs at the stadium to bring employers from a wide range of sectors together to provide job and apprenticeship opportunities to local people.
- 5.15 During the Covid pandemic when professional football was suspended or being played behind closed doors, the Club partnered with nearby North Middlesex Hospital to provide women's outpatient services in order to release capacity at the hospital for Covid patients. It was also the first community hub to be used to distribute food to the most vulnerable in North Tottenham. The stadium also hosted three 'mass vaccination clinics' during the pandemic in addition to 'drive-through' Covid testing.
- 5.16 The stadium is one of the ten host stadia in the United Kingdom and Republic of Ireland bid to host the 2028 European Football Championships (the "2028 Euros"). Whilst the bid is now unopposed following the withdrawal of Turkey, a formal announcement on the winning bid is expected from UEFA on 10 October 2023.

THS Transport

5.17 THS is promoted as a 'public transport destination' and is heavily reliant on public transport. One of the principal objectives of the stadium S.106 was to reduce the private car mode share to a maximum of 23%.

5.18 THS is served by four Major Event Day stations:

- White Hart Lane station is the closest station to THS (a 5 minute walk) and located to the west of the stadium within HRW. It is served by a London Overground line, which connects London Liverpool Street station with Enfield Town and Cheshunt stations. On a Major Event Day there are typically four trains per hour in both directions. The station was redeveloped in 2019 and configured to accommodate larger crowds associated with Major Events at the THS. London Liverpool Street station provides an interchange with the newly opened Elizabeth line (Crossrail) and various other London Underground lines.
- Northumberland Park station is a ten minute walk to the east of the THS. It is served by Greater Anglia and Stansted Express services.
- Tottenham Hale station is a 25 minute walk south of THS and provides an interchange between Greater Anglia/Stansted Express and London Underground (Victoria line) services.
- Seven Sisters station is a 30 minute walk south of THS and provides an interchange between London Overground services and London Underground (Victoria line).

5.19 Although varying from event to event and between weekday and weekend, approximately 20% of Major Event Day spectators arrive at the THS via White Hart Lane station, equating to approximately 12,000 persons (averaged between 14,000 arriving and 10,000 departing). Mr Ancliffe's Proof of Evidence deals with the passage of these spectators through HRW.

5.20 In addition to rail transport and Transport for London buses, public transport is supplemented by a THFC funded shuttle buses linking the THS with Wood Green station (London Underground Piccadilly line) and Alexandra Palace station (Great Northern services). In partnership with Big Green Coach, THFC also provides a regional coach service to numerous destinations around the south-east of England that are less well served by rail.

- 5.21 The location of the shuttle bus stop and regional coach collection points to the west of the THS mean that there is additional pedestrian traffic passing through HRW beyond users of White Hart Lane station. This addressed in the evidence of Mr Ancliffe.
- 5.22 The operation of the THS is governed by a suite of documents that include the S.106, Local Area Management Plan and Operational Travel Plan.
- 5.23 As a sports stadia with a capacity greater than 10,000, the THS must be certified under the Safety at Sports Grounds Act 1975. In addition, the Football Spectators Act 1989 requires the Sports Ground Safety Authority (“SGSA”) to issue an annual licence as part of its statutory review function.
- 5.24 The THS is also subject to the issue of a ‘safety certificate’ by the Local Authority. For certain events (for example later finishing music concerts) the Club must discharge a condition by submitting a ‘bespoke transport plan’ for approval.
- 5.25 The Local Authority chairs the Safety Advisory Group (“SAG”) for the THS which meets several times each year and particularly ahead of the holding of third-party events. The SAG brings together all relevant stakeholders include the emergency services to provide the Local Authority with guidance in respect of the issuing of safety certificates.
- 5.26 There is a Major Event Day controlled parking zone in operation across the northern part of Haringey and the southern part of Enfield on Major Event Days. There are extensive road closures (including the High Road which is typically closed two hours before the start of a Major Event; during the Major Event; and up to an hour post the Major Event). Service buses are generally diverted to the east of the THS during the road closure period.
- 5.27 I mention this in respect of the operational impact of the THS on the local area including HRW. The Major Event Day stadium operation is summarised in a booklet that the Club produced for the local community ahead of the stadium opening (Events at the new stadium – a guide for local residents and businesses (Summer 2019) or ‘The Blue Book’), which is attached as my **Appendix F**). Although in the process of being updated to reflect forthcoming changes to the Local Area Management Plan, the Inspector may find this a useful reference.
- 5.28 I have tried to summarise what are complex and extensive transport and local area management operations for the Inspector’s benefit. These operations (although constantly under review) have been developed by the Club over a long period of time and in partnership with a great many stakeholders, including the Council.

- 5.29 The need for the Club to ensure that it is able to continue operating the THS safely cannot be overstated and as Mr Ancliffe demonstrates in his Proof of Evidence this critical point has not been proven in The Scheme that underlies The Order.
- 5.30 From the 2012 MoU (my **Appendix A**) onwards, the provision of an appropriate link between White Hart Lane station and the THS has been a requirement for this very reason. The Order Scheme simply does not achieve this.

6. LendLease Engagement with THFC

- 6.1 In this section I set out what substantive engagement has taken place between LendLease and THFC in respect of the Scheme that underlies the Order, particularly in relation to the form and content of the Scheme and how this addressed crowd flow/safety issues.
- 6.2 I note firstly that the Development Agreement (**CD5.5**) contemplated that a Major Landowners Group would be established to include representatives in the vicinity of High Road West, which expressly included THFC.
- 6.3 Clause 32.1 of the Development Agreement set out that the purpose of the Major Landowners Group was “to ensure the co-ordinated delivery of regeneration across North Tottenham and delivery of the vision set out in the Tottenham Area Action Plan”.
- 6.4 Clause 32.2 provided that the Major Landowners Group should meet every three months in the first year following completion of the Development Agreement and on a regular basis thereafter. It provides that the Group would use reasonable endeavours to agree solutions to a number of specific matters that affect High Road West, NDP (the Northumberland Development Project) and the now abandoned Haringey Development Vehicle proposals for Northumberland Park to the east of the Stadium. These matters included commercial uses, social infrastructure, public realm and open space, programme, co-ordination of socio-economic and cultural opportunities, co-ordination of highway and transport works, and the promotion of North Tottenham.
- 6.5 Notwithstanding the clear intention and obligations of the Development Agreement, the Club has never been invited to a meeting of the Major Landowners Group and to the best of my knowledge the Major Landowners Group has not been formed, nor has a single meeting of it ever taken place.
- 6.6 As I note at paragraph 5.29 in the preceding section of my Proof of Evidence, the need to ensure that crowds attending the THS from White Hart Lane station (and beyond) will be able to continue doing so safely during the construction and end state of HRW is of paramount importance to the Club.
- 6.7 Indeed, it is a matter that the Club drew to the Council’s attention even before the Council had selected its Development Partner for HRW. In July 2016 when LendLease were one of six bidding parties, the Club produced a document entitled ‘*Fixed Design Parameters for THFC Stadium/WHL Station Link*’. The document was jointly produced for the Club by the stadium architect (Populous); the Club’s strategic transport consultant (Tim Spencer & Co.); and crowd safety advisors (Movement Strategies). The

document was intended to provide initial guidance on crowd flow/safety matters, but as the covering email made clear, the issue could not be adequately addressed in a single document and would require “extensive engagement”. The document (which is attached as my **Appendix G** along with the covering email to the Council) was presented to each of the bidding parties.

- 6.8 The Club has been in dialogue with LendLease since they were first appointed as development partner on the now abandoned Haringey Development Vehicle (“HDV”) in March 2017. Part of the HDV incorporated the Northumberland Park estate lying immediately east of the THS and so was also of significant interest to the Club operationally.
- 6.9 As set out in Section 3 of my Proof of Evidence, LendLease were then formally approved as the Council’s preferred Development Partner in September 2017 and the Development Agreement was in turn completed in December 2017.
- 6.10 Dialogue between the parties between March 2017 and September 2017 related solely to the HDV. After September 2017, dialogue related to both HDV and HRW up until HDV was abandoned by the Council in July 2018.
- 6.11 Initial dialogue focused on attempts to build a long-term working relationship.
- 6.12 However in February 2018, LendLease objected to the Club’s Goods Yard planning application (LPA Ref: HGY/2018/0817) claiming that it would prejudice attempts to develop HRW in a comprehensive manner. The application was later allowed on appeal and eventually incorporated into the Order Scheme (as paragraph 6.16 below), but it signalled the extent to which LendLease were really prepared to collaborate with the Club.
- 6.13 Subsequent dialogue up to the point of LendLease submitting its planning application for the Order Scheme did not progress beyond preliminary matters and the potential establishment of a collaboration agreement between the parties. At no point has the Club had any input whatsoever into the design and composition of what is now the CPO scheme (“the Scheme”).
- 6.14 Mr Bashforth and I attended a short meeting on 28 July 2021 with LendLease and their planning advisor, DP9. The main purpose of the meeting was simply to update the Club that the proposed application intended to incorporate the schemes for which the Club had at that time secured planning permission for its sites north of White Hart Lane.
- 6.15 Beyond this headline explanation, no details of the design or composition of the scheme, or the proposed phasing were provided. Contrary to what the AA would have

the Inspector believe, the Club was not provided with the opportunity to provide any comments prior to submission of the planning application.

- 6.16 I draw the Inspector's attention to an email I sent to Mr McNaugher on 21 October 2021 (my **Appendix H**), which set out three complaints. First, that the Club had not been notified of a 'Development Management Forum'⁵ and therefore were not afforded the opportunity to attend. Secondly, to note the general lack of engagement by LendLease with the Club on its planning application and thirdly, to note that there had been no meaningful engagement with the Club in respect of crowd flow matters.
- 6.17 LendLease submitted the planning application in October 2021. Upon notification of the submission of the application, the Club and its professional advisors undertook a detailed review of the application.
- 6.18 The consequences of LendLease's lack of meaningful pre-application engagement with the Club became immediately apparent. Upon review of the application material it became clear that no information or assessment had been provided regarding the impact of the proposals on the management of crowds attending the Tottenham Hotspur Stadium. It was not until this was pointed out by the Club that LendLease instructed Buro Happold to produce a study.
- 6.19 Buro Happold had previously been engaged by the Club in respect of crowd flow and transport matters generally and to the best of my knowledge, were not instructed by LendLease to advise in respect of crowd flow matters until after the submission of the planning application in October 2021.
- 6.20 From this chronology alone it is clear that crowd flow matters were simply not taken into account to any meaningful degree in the design of the scheme or the proposed phasing arrangements prior to submission of the application. Mr Ancliffe addresses the consequences of this in his Proof of Evidence.
- 6.21 I find this particularly surprising as LendLease had previously been made aware of the importance of THS crowd flows/safety matters (please see my **Appendix G** and paragraph 6.7 above).
- 6.22 Following the submission of the planning application, Lendlease belatedly approached the Club to discuss crowd flow matters. Quod, on behalf of the Club wrote to the Council on 20 December 2021 (my **Appendix I**) to highlight its concerns regarding the absence of any proper assessment of the impact of the application on crowd flow, and indicated

⁵ A public forum commonly used by Haringey Council ahead of the submission of a major or potentially controversial planning application that enables a developer to present its scheme and take questions.

its willingness to work with the applicant to ensure a proper assessment was undertaken.

- 6.23 The first meeting took place on 24 January 2022, with LendLease’s advisors and representatives from the Council also in attendance. At the meeting the Club was advised that modelling work was still ongoing that the results of the assessment would be provided to the Club shortly thereafter.
- 6.24 The Club was provided with an initial Crowd Flow Study Report prepared by Buro Happold on 9 February 2022 and was invited to attend a subsequent meeting on 11 February 2022 when LendLease presented the report.
- 6.25 On 4 March 2022 the Club wrote to the Council setting out its objection to the planning application (my **Appendix J**). The letter addressed a number of issues, including crowd flow matters, but concluded by inviting the Council and LendLease to pause determination of the planning application and to undertake a wholesale review of the scheme. The letter confirmed that the Club was very willing to work with LendLease and the Council as part of this process. Neither Lendlease nor the Council responded to this request.
- 6.26 A subsequent updated report was provided to the Club on 4 March. On 9 March the Council advertised its intention to consider the planning application at its meeting on 17 March 2022. The published officer report to committee contained a recommendation to approve the application.
- 6.27 On 14 March, the Club’s solicitors, Richard Max & Co, wrote to the Council (my **Appendix K**) highlighting that the Club was still reviewing the Crowd Flow Study Report and that the Council had not properly consulted upon the report as required by the Town and Country Planning Environmental Impact Assessment Regulations 2017.
- 6.28 On 16 March, Richard Max & Co wrote again to the Council (my **Appendix L**) setting out the Club’s response to the officer report. The letter highlighted that the Club had been provided with only very little time to properly consider the Crowd Flow Study Report and noted that it had only been provided four days prior to publication of the Officer Report. The letter appended a report from Movement Strategies setting out its concerns with the Crowd Flow Study Report. Movement Strategies concluded that the Crowd Flow Study Report did not provide sufficient detail to enable the Club (or the Council) to have confidence that safe and efficient crowd flow operations could be provided both during the construction period and also in the completed development. Mr Ancliffe addresses this point in his Proof of Evidence.

- 6.29 Due to the Club's representations, the Council deferred consideration of the planning application at its March meeting.
- 6.30 Following the deferral a revised Crowd Flow Study was prepared by Buro Happold and submitted on 22 May 2022.
- 6.31 Further limited engagement took place in the form of a meeting between the Club and LendLease and their respective solicitors to discuss access provisions on 31 May 2022. A technical meeting was held between Movement Strategies and Buro Happold on 22 June 2022.
- 6.32 The Club maintained that further information and assessment was required and submitted further letters of objection on 30 June (**Appendix M**) and 20 July (**Appendix N**) but notwithstanding its concerns the Council resolved to approve the planning application in July 2022. A further meeting took place regarding the access provisions in July 2022 prior to the Council granting planning permission upon conclusion of the S.106 Agreement on 31 August 2022.
- 6.33 Rather inexplicably, LendLease have chosen not to engage meaningfully with the Club on the production of the Scheme. As a consequence, THFC will be appearing as an objector to a CPO that relates to the delivery of (part of) HRW – the concept of HRW first being raised by the Club in 2012 as part of the 2012 MoU (my **Appendix A**).
- 6.34 Mr Bashforth in his Proof of Evidence explains why the Scheme fails to meet planning policy and in particular the TAAP.
- 6.35 In his Proof of Evidence, Mr Ancliffe describes the residual position in respect of crowd movements through HRW and why the Club still has fundamental concerns.

7. An Alternative Approach

Introduction

- 7.1 The Club believes that the objectives of the TAAP and its predecessor documents can be better achieved through an alternative approach. The importance of adhering to key principles in the TAAP and the Club's desire to avoid another failed regeneration attempt is set out in Section 3 of this Proof of Evidence.
- 7.2 The Club commissioned ARUP (as original authors of the 2014 HRWMF) to produce an Alternative Masterplan for the Order land. The Alternative Masterplan sits within an alternative phasing plan for the whole of HRW. This is collectively the Club's Alternative Approach.
- 7.3 In accordance with the strategic objectives of the TAAP, the Club has agreed binding heads of terms with one of the World's leading theatre and entertainment groups with the intention of forming a joint venture partnership for the development and operation of a multi-purpose cultural venue.
- 7.4 In accordance with the second ITAR critical recommendation, the venue would create an architectural landmark and be an anchor to the wider HRW redevelopment, complementing THFC's Stadium. It would attract a programme of events that would not otherwise be attracted to Tottenham, enhancing the borough's existing cultural offer and contributing significantly to the TAAP objective of creating a leisure destination for London.
- 7.5 Ms Camburn's Proof of Evidence sets out how the multi-purpose cultural venue can be accommodated within the Alternative Masterplan.
- 7.6 Her evidence also describes how the Alternative Approach better responds to the TAAP than the Scheme through the delivery a larger, reconfigured Moselle Square to address the Club's crowd safety concerns; and rephasing to deliver Moselle Square and its associated placemaking benefits at the beginning rather than the end of the HRW development.
- 7.7 In accordance with THFC's SoC (**CD 7.2 and 7.3**) and Supplemental SoC (**CD 7.4 and 7.5**), the Club has begun engaging with key stakeholders and the wider community on the Alternative Approach.

Engagement on the Alternative Approach

- 7.8 The table below summarises both the engagement that has taken place so far and what is still planned.

Table 7.5: Engagement on the Alternative Approach

Stakeholder	Date	Summary of Feedback
Business and Community Liaison Group (BCLG) , which included representatives from various local residents' associations, local businesses; Ward Councillors; and Council officers.	11 July and 15 August 2023	Feedback has generally been positive. Specific queries were raised about the housing decant numbers (since provided by THFC) and whether The Grange would be an appropriate building to accommodate the Library Learning Centre (from a profile perspective and the ability to install IT into a listed building). The Club has continued to discuss the Alternative Approach informally with individual members of the BCLG, responding to further queries as necessary.
Tottenham Traders Partnership (TTP) The TTP is the primary business networking forum in North Tottenham and its stated aim is to create a safe and attractive shopping area around Tottenham High Road.	27 September 2023	THFC organised a special meeting of the TTP on 27 September to rehearse the Alternative Approach with the local business community. Feedback during the meeting was positive and the Club has subsequently had further positive feedback, particularly around the additional footfall that the new cultural venue will bring on THS non-Major Event days. TTP meetings are normally minuted although we are yet to receive them from the TTP secretariat.
Jackson's Lane Arts Centre (JLAC) , Archway Road, Highgate	7 September and 5 October 2023	Feedback was positive and the proposed cultural venue and considered an exciting addition to the Borough's cultural offering. There is also a follow up meeting between JLAC and Tottenham Hotspur Foundation on 6 October.
Bernie Grant Arts Centre , Tottenham Green	8 September 2023	Feedback was neutral but with an intention to continue engagement with the Club on this and other projects.
Haringey Shed , Irish Centre, Tottenham	14 September and 29 September 2023	Feedback was positive and there was a request that the Club liaise with their youth forum, which the Club is in the process of arranging.
Alexandra Palace	12 October 2023	Feedback to be provided.
Public Exhibition To be held in the Club's M Cafe	25 October 2023	Residents will be invited via the Club's local email and SMS alert service which has 3,000 residents signed up to. Information about the event will also be disseminated via the BCLG, the Club's primary local engagement forum.

- 7.9 Subject to GDPR requirements, notes, dates and times of meetings and correspondence can be provided if required.
- 7.10 The Club's Alternative Approach has generally been well received so far, but the Club acknowledges that the engagement is at a very early stage.
- 7.11 I would like to reserve the opportunity to provide the Inquiry with any further feedback received following the exchange of Proofs of Evidence.
- 7.12 The Club takes its relationship with the local community very seriously, not least as it is a long-term relationship that will outlast this CPO process. The Club can only operate the THS successfully with the support of its local community. By way of example, there were 45 objections to the THS planning application and 98 representations in support⁶.
- 7.13 If the opportunity to pursue the Alternative Approach arises, the Club would ensure that the dialogue it has started through this process would continue and play a meaningful part in the development of any proposals.

⁶ Committee Report dated 16 December 2015 for applications HGY/2015/3000-3002

8. Summary and Conclusions

- 8.1 I have set out a more complete chronology of HRW and why the regeneration principles established in the aftermath of the August 2011 riots are so important (Section 3). One of those principles is a that HRW should be a genuine mixed-use scheme that contributes to the creation of “London’s next premier leisure destination.”
- 8.2 I have set out how THFC has responded to those same regeneration principles through its own development and other activities. I have explained what contribution I believe those developments and activities have and are making to the ongoing regeneration of North Tottenham, with particular emphasis on the THS and its contribution (Section 4 and 5).
- 8.3 I have demonstrated that there has been a lack of genuine engagement by LendLease since their appointment as the Council’s Development Partner for HRW (Section 6).
- 8.4 Mr Bashforth and Mr Ancliffe describe the consequences of this lack of engagement in terms of The Scheme not meeting adopted planning policy and nor demonstrating that THS spectators can safely traverse HRW, particularly during the ten plus years construction duration.
- 8.5 Ms Camburn describes the Alternative Approach/Masterplan and how it provides a better and more appropriate response to the TAAP. My Section 7 summarises community feedback to the Alternative Approach/Masterplan, which has been largely positive.
- 8.6 In conclusion, the Scheme that underlies the Order has been conceived in relative isolation of the local area and in particular, the second largest football club stadium in the United Kingdom, which has an operational footprint extending some way beyond the Order Scheme.
- 8.7 It has been conceived with apparent disregard to the fundamental regeneration principles that were rigorously established in the aftermath of the August 2011 riots and enshrined by the public and private sectors specifically to avoid a repetition of those riots.
- 8.8 THFC for its part has attempted to adhere to those principles over the 12-year intervening period. The socio-economic and physical benefits of the THS and related developments are now well documented and summarised in my evidence.

- 8.9 Notwithstanding the investment by the Club and others in North Tottenham, the AA's own SoR and SoC rightly acknowledge that the majority of the area's socio-economic challenges (high unemployment, overcrowding, child poverty and high crime rates) that were factors in the August 2011 riots, still persist.
- 8.10 The regeneration story of North Tottenham has undoubtedly started and is slowly becoming more tangible. In this context, the Club believes it is imperative that regeneration efforts continue in accordance with the regeneration principles enshrined in ITAR, HRWMF and adopted TAAP.
- 8.11 The Scheme departs markedly from these regeneration principles. A scheme containing 94.3% housing and only 0.2% leisure uses is neither mixed-use nor a contributor to "London's next premier leisure destination."
- 8.12 In this context, the Scheme is not only a missed opportunity. It is far worse than that. With adherence to longstanding and commonly shared regeneration principles and with genuine engagement, the Inspector should have been considering an Order that had the wholehearted support of the Club and the community.
- 8.13 We present the Alternative Approach and Masterplan in good faith as the basis for genuine engagement with the AA and LendLease and in the hope that it is still not too late to continue the regeneration story.

9. Statement of Truth and Declaration

Statement of Truth

- 9.1 I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Declaration

- 9.2 I confirm that my proof of evidence has drawn attention to all material facts which are relevant and have affected my professional opinion.
- 9.3 I confirm that I understand and have complied with my duty to the inquiry as an expert witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.
- 9.4 I confirm that I am not instructed under any conditional or other success-based fee arrangement.
- 9.5 I confirm that I have no conflicts of interest.
- 9.6 I confirm that I am aware of and have complied with the requirements of the rules, protocols and directions of the inquiry.
- 9.7 I confirm that my report complies with the requirements of RICS – Royal Institution of Chartered Surveyors, as set down in the RICS practice statement *Surveyors acting as expert witnesses*.



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Richard Serra BSc(Hons) DipSurv RICS RTPI

9 October 2023.....
Dated