

**Appendices**  
to  
Proof of Evidence of  
Richard Serra BSc (Hons) DipSurv MRICS MRTPI  
**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



## **Appendix A**

Memorandum of Understanding between Haringey Council and THFC (January 2012)

**MEMORANDUM OF UNDERSTANDING  
GUIDING THE TRANSFORMATION OF NORTH TOTTENHAM AS A PREMIER  
LOCATION**

**PARTIES:**

- (1) London Borough of Haringey ("LBH"); and
- (2) Tottenham Hotspur Ltd and Tottenham Hotspur Football & Athletic Co Ltd (together "THFC")

**INTERPRETATION:**

The "North Tottenham Regeneration Programme" comprises the following phases:

**Northumberland Development Project ("NDP Scheme") – 2012-16:-**

- Phase 1 – the Northern (Supermarket and Mixed-Use) Development;
- Phase 2a – the Stadium Development (including the northern and southern public podium and the restoration of heritage buildings);
- Phase 3 – the Southern Residential/Mixed-Use Development.

**"High Road (west)" (subject to consultation with residents and businesses) :-**

- Phase 2b (2012-2014) – hotel, retail and residential units including a new public square and pedestrian link between the High Road and a new White Hart Lane Station entrance; and
- Phase 4 (2014-2020) – comprehensive improvement and redevelopment of the remainder of the 9.9 has. High Road (west) area in a mixed-use development with the potential to provide up to 2,000 homes, new retail and employment space and transformed public space.

**"Infrastructure Improvements"** in and beyond the immediate area to support this regeneration programme (as well as regeneration in other parts of Tottenham) include:-

- Passenger capacity improvements at Tottenham Hale Station (to provide additional gateline capacity, ticket hall improvements and a third escalator);
- Access and operational works at Northumberland Park Station;
- West Anglia Mainline passenger capacity and service frequency improvements to both the Northumberland Park line and White Hart Lane line;
- Provision of a new entrance and southern ticket hall at White Hart Lane Station directly accessible from the western end of Whitehall Street.

**"The Mayor"** means the Mayor of London

The NDP scheme is as proposed in THFC's planning and listed building applications HGY/2010/1000-1003 but will be subject to scheme content/design changes for which planning applications will be made as necessary.

The High Road (west) masterplan proposals relate to the area as shown on the plan attached as Appendix 1.

Given the passage of time between the signing of this memorandum and regeneration funding being provided

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under paragraph 12.1, the impact of inflation on the amount made available will be kept under review to ensure the funding retains maximum impact.

**BACKGROUND:**

- (A) A key objective of the regeneration strategy for Tottenham is the transformation of North Tottenham spearheaded by the NDP Scheme promoted by THFC. Providing homes, new public space, employment and community facilities with a new international standard Tottenham Hotspur Stadium as its centrepiece, as well as a 'premier' standard visitor experience this transformation – the North Tottenham Regeneration Programme – will focus on improving the quality of life of existing residents, attracting new residents and new facilities and encouraging the growth of local businesses. The aim is to enable residents, businesses, investors and visitors to have confidence and pride in Tottenham.
- (B) Subject to consultation with local people and businesses and to formal approval by the Council, the following 10 'Transformation Principles' are proposed to guide the preparation of the details of the North Tottenham Regeneration Programme:
1. *Phased redevelopment and improvement focused on enabling existing residents to stay in the area in better quality homes*
  2. *Expanding housing choice and supply*
  3. *Social and economic development programmes to increase educational attainment, job skills and opportunity for local people*
  4. *Fostering the growth of new and existing businesses in appropriate locations and, where moves are necessary, supporting firms to remain in Haringey*
  5. *Increasing jobs*
  6. *Sustainable development with access to new public spaces for community and cultural events*
  7. *Phased provision of supporting community infrastructure, including school places and healthcare facilities*
  8. *Increasing residents' and visitors' perceptions of safety*
  9. *Catering for the needs of visitors, maximising spend in North Tottenham while minimising adverse impacts on residents and businesses*
  10. *Maintaining strong public transport links with the wider area and modernising rail infrastructure*
- (C) THFC has invested in excess of £60m towards land purchases within the wider development and in excess of £25m towards planning applications in order to bring forward the NDP Scheme. THFC owns in excess of 90% of the land needed to implement the NDP Scheme. THFC also owns 3 properties in the site proposed for the Phase 2b development and other properties in Phase 4.
- (D) North Tottenham is a highly sustainable location for a new Stadium and mixed-use development with the potential to accommodate over 2,400 new homes. White Hart Lane Station is only 20 minutes from Liverpool Street Station and 4 minutes from a direct connection with the Victoria Line.
- (E) LBH granted planning permission and listed building consent for the NDP Scheme on 20 September 2011.
- (F) LBH owns in the region of 35% of the land within the High Road (west) area and currently manages 297 dwellings in that area.
- (G) THFC has provided financial information which has been reviewed on behalf of LBH by Grant Thornton and their subsequent report has confirmed that the NDP Scheme is not currently financially viable.

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- (H) The Mayor is proposing to provide appropriate strategic support for the North Tottenham Regeneration Programme, as set out in a letter to THFC dated 8 December 2011 and to LBH dated 16 January 2012.

**OBJECTIVES:**

- (A) The Parties have agreed to collaborate to secure the delivery of the North Tottenham Regeneration Programme.
- (B) This memorandum of understanding sets out the Parties' joint and respective contributions and obligations to each other with the aim of achieving this objective.

**THE PARTIES AGREE:**

1. To act in good faith with each other and third parties and use best endeavours to secure the expeditious delivery of the North Tottenham Regeneration Programme as set out in this memorandum.
2. This memorandum is not legally-binding and nothing in it shall constitute a fetter on the discretion of LBH, future decisions that it might make or in any other way override its public law and local government duties.

**THFC WILL:**

3. Immediately following the completion of this memorandum, commit publicly to the NDP Scheme as its preferred site for a new stadium and publish (jointly with LBH) a press statement to confirm this commitment in the form attached as Appendix 2.
4. Prior to signing this memorandum, THFC has commenced the necessary restructuring to ensure it is in a position to start the process of fund raising. Commitment to the scheme will result in THFC's commercial team presenting the scheme to potential partners to unlock naming rights and the club will recommence discussions with banks and advisors to evaluate the most effective way to fund the NDP scheme.

THFC has completed prior to signing this memorandum a bank compliant financial model (issued to LBH on 15 December 2011) (including estimated costs and income of the NDP Scheme and all funding sources) that THFC anticipates can be used by institutional lenders and more specifically by LBH to demonstrate that the NDP Scheme is viable, fundable and deliverable, and to :

- amend the terms of the s106/278 agreement dated 20 September 2011;
- make and progress a Compulsory Purchase Order; and/or
- use its powers under Section 237 Town and Country Planning Act 1990.

This financial information will also be used to support the preparation and presentation of the case for compulsory purchase at any Public Inquiry and THFC will appear (at its own cost) if requested by the Council to present and be cross-examined on that evidence at the Inquiry.

5. Continue to use best endeavours to acquire the remaining plots of 3<sup>rd</sup> party land needed for the NDP Scheme and start, and progress diligently, construction of each phase of the NDP Scheme as follows:

Phase 1 – within 9 months of satisfaction of all of the following matters:

- (i) securing title in all the land needed for Phase 1;

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- (ii) planning permission being granted for the contemplated revisions to Phase 1 that are required to support NDP Scheme viability;
- (iii) LBH committing to a programme for the delivery of the Phase 1 highway, parking, and pedestrian route improvement works (in accordance with the proposed revisions to the S106 Agreement dated 20 September 2011) linked to the anticipated construction timetable for Phase 1 of the NDP Scheme; and
- (iv) Bank and other financing having been agreed for Phase 1.

Phase 2a - within 9 months of satisfaction of all of the following matters :

- (i) securing title in all the land needed for Phase 2a;
- (ii) LBH committing to a programme for the delivery of the Phase 2a highway, parking and pedestrian route improvement works (in accordance with the proposed revisions to the S106 Agreement dated 20 September 2011) linked to the anticipated construction timetable for Phase 2a of the NDP Scheme;
- (iii) the completion of a development agreement with LBH (as contemplated in paragraph 13.2);
- (iv) the resolution of all other issues (for example road closures and Rights of Light) to deliver a legally implementable scheme;
- (v) planning permission being obtained for Phase 2b;
- (vi) all land for the Phase 2b site having been acquired (including by CPO if necessary);
- (vii) a commitment to implement the public sector works within Phase 2b (comprising the boulevard, community space and works to White Hart Lane Station);
- (viii) and all reasonable endeavours have been taken to secure a programme of delivery of phases 2b and 4
- (ix) Bank and other financing having been agreed for Phase 2a.

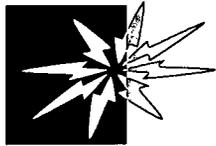
Phase 3 - within 9 months of satisfaction of all of the following matters:

- (i) the opening of the Completed Stadium;
- (ii) planning permission being obtained for the contemplated revisions to Phase 3;
- (iii) the resolution of all other issues (for example Rights of Light) to deliver a legally implementable scheme; and
- (iv) Bank and other financing having been agreed for Phase 3.

6. Reimburse LBH for all costs incurred in the detailed design and carrying out of the Phase 1 highway, parking and pedestrian route improvement works (to a maximum liability of £1.39m.) if THFC abandons its plans for a new Stadium.
7. Prepare and submit planning applications for amendments to Phases 1 and 3 by the end of December 2011 (for the avoidance of doubt THFC shall only be required to pay the statutory planning fees in respect of these applications).
8. Prepare and submit a planning application for Phase 2b at an appropriate time to be agreed with LBH following consultation with tenants of Council owned properties and private owners affected by the proposals and use reasonable endeavours to acquire necessary properties within Phase 2b by agreement offering, where possible, relocation to the owners/occupiers.
9. Prepare and submit a planning application for Phase 4 at a time to be agreed with LBH following consultation with existing residents and businesses and subject to an appropriate

## **Appendix B**

Extracts from Proof of Evidence of Ms Garner to the 2012 CPO inquiry



**Haringey** Council

Document No.: AA/LG/1

**TOWN AND COUNTRY PLANNING ACT 1990  
ACQUISITION OF LAND ACT 1981**

**Inquiry into:**

**THE LONDON BOROUGH OF HARINGEY  
(NORTHUMBERLAND DEVELOPMENT PROJECT) (No. 1)  
COMPULSORY PURCHASE ORDER 2012**

**Proof of Evidence**

**of**

**Lyn Garner**

**Haringey Council**

PINS Ref.: APP/NPCU/CPO/Y5420/70787

Inquiry start date : 12 March 2013

- 5.35 The scheme will involve the restoration of heritage buildings owned by THFC and this will uplift the appearance of the High Road Conservation Area.
- 5.36 A greater proportion of match day spectators at the new stadium are projected to come by non-car modes. The planning permission for the NDP Scheme (and the corresponding s106 obligations on THFC)<sup>16</sup> is based on 77% of Stadium spectators using non-car modes – bus, train, cycle or walk. Currently 43% of fans come by car<sup>17</sup>. The s106 agreement requires THFC to take a range of measures to secure this mode shift. To complement this, the Council is pursuing the extension of the existing match day Controlled Parking Zone around the current Stadium.

*New public space*

- 5.37 The 11,900sqm of new publicly-accessible space around the Stadium will transform the appearance of the area and is a major environmental benefit. The area currently lacks high quality public space. This new space, at ground and podium level, will be publicly-accessible 364 days a year (enshrined in the s106 Agreement) and will be a significant benefit for safe and secure pedestrian east-west movement and for community events and activities. Together with the expected provision of new food and beverage premises in the area, this will be a new vibrant meeting place for local people.

*Bring vacant land back into use*

- 5.38 Given that most third party owners have sold their land to THFC and most of those buildings have been demolished, the construction of the NDP Scheme will ensure that those tracts of land not part of the Phase 1 Northern Development will have an effective use. If the new Stadium could not proceed, those plots cannot be developed effectively given the location and impact of the existing Stadium. This re-use of vacant land will transform the current appearance of what are highly prominent sites close to the High Road and will improve the visual appearance for local residents.

***Potential for the NDP Scheme to be a Catalyst for Wider Regeneration***

- 5.39 The NDP Scheme brings significant social, economic and environmental benefits in its own right for North Tottenham. However, it is anticipated that it will also provide a springboard for further private sector investment that will bring greater and sustained regeneration in the wider area.
- 5.40 Sir Stuart Lipton, in the same recent report I referred to earlier, acknowledges the importance of the THFC investment:

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<sup>16</sup> Fifth Schedule of the s106 Agreement 29 March 2012 (AA Document No CDD6)

<sup>17</sup> Officers Report to Planning Committee on the NDP Scheme 30 Sept 2010 page 54 (AA Document CDD1)

*'We applaud Tottenham Hotspur FC's decision to stay in the area. The football club gives Tottenham global recognition, and the decision to redevelop White Hart Lane is a strong sign of confidence in the area. It carries significant regeneration potential with the promise of new housing and retail units that bring jobs, as well as the opportunity to serve as a catalyst for wider change in the area. Public realm improvements, estate renewal and a new railway station are all critical to capture the benefit of this investment.*

*'We look forward to a new vision for developments around the approved stadium, incorporating high quality architecture, greater density, and more retail units adjoining the new Sainsbury's supermarket site, providing even more local jobs.'*<sup>18</sup>

- 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

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<sup>18</sup> 'It Took Another Riot' – Report of the Mayor of London's Independent Panel on Tottenham Dec 2012 (AA Document CDG1)

Stadium itself, will make this part of Northumberland Park a key leisure and entertainment destination. Marc Dorfman 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'.

- 5.44 In due course the Council will promote estate renewal in the areas to the east of the NDP Scheme, eg Northumberland Park Estate, and diversify the tenure mix with new private sector investment. But, unless there is a change in perception, it will be very difficult to get private buyers interested in coming to North Tottenham.
- 5.45 Crucially, the NDP Scheme is about showing confidence in North Tottenham. Confidence breeds confidence. Confidence will bring new opportunities for local people. New opportunities will bring the chance for people to achieve their potential. Confidence will enable everyone to feel proud to be a part of Tottenham.
- 5.46 That clear signal of new confidence will also create the potential for new investment in the wider area. As I have already said, the Council is putting in place detailed plans, consistent with its existing policy framework, for the next phases of regeneration and new development in North Tottenham. The NDP Scheme is critically important for the Council's and the community's ambitions for transformational change in North Tottenham.

## **6. The Need for Compulsory Acquisition of the Order Land**

- 6.1 Most of the interests needed to deliver the NDP Scheme have been acquired. Paul Phillips' evidence discusses the need to acquire what remains.
- 6.2 As his evidence makes clear, THFC has taken all reasonable steps to acquire the land by agreement including the purchase of a relocation site and the securing of a suitable planning permission for the main objectors.
- 6.3 I have set out the benefits of the NDP Scheme and set them in the context of the substantial social, economic and environmental deprivation in North Tottenham. The NDP Scheme will, in my view, contribute significantly to the social, economic and environmental well-being of the area. These benefits present a compelling case in the public interest for the last remaining plots of land to be acquired and for the NDP Scheme to be realised.
- 6.4 As I said earlier, the extent of disadvantage in North Tottenham is clear. The need for action is obvious and urgent. The Council has long been determined to take all possible action to alleviate this high level of deprivation and the NDP Scheme presents a first major stride in helping achieve that and to realise wider transformation. The Council's ambitions for Tottenham

## **Appendix C**

Memorandum of Understanding between Haringey Council and THFC (January 2013)

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**MEMORANDUM OF UNDERSTANDING  
GUIDING THE TRANSFORMATION OF NORTH TOTTENHAM AS A PREMIER LOCATION**

**PARTIES:**

- (1) London Borough of Haringey ("LBH"); and
- (2) Tottenham Hotspur Limited and Tottenham Hotspur Football & Athletic Co Limited (together "THFC")

**INTERPRETATION:**

The "North Tottenham Regeneration Programme" comprises the following phases:

**Northumberland Development Project ("NDP Scheme") – 2012-18:-**

- Phase 1 – the Northern (Supermarket and Mixed-Use) Development;
- Phase 2 – the Stadium Development;
- Phase 3 – the Southern Residential/Mixed-Use Development.

"Phase 4" (subject to consultation with residents and businesses) in accordance with the masterplan to be agreed between the parties and subject to public consultation:-

- Food & beverage, leisure, hotel, retail and residential units including a new public square and pedestrian link between the High Road and a new White Hart Lane Station entrance; and
- Comprehensive improvement and redevelopment of the remainder of the 12 has. Phase 4 area (shown on the plan attached as Appendix 1) in a mixed-use development with the potential to provide up to 2,000 homes, new retail and employment space and transformed public space.

"Infrastructure Improvements" in and beyond the immediate area to support this regeneration programme (as well as regeneration in other parts of Tottenham) include:-

- Passenger capacity improvements at Tottenham Hale Station (to provide additional gateline capacity, ticket hall improvements and a third escalator);
- Access and operational works at Northumberland Park Station;
- West Anglia Mainline passenger capacity and service frequency improvements to both the Northumberland Park line and White Hart Lane line;
- Provision of a new entrance and ticket hall at White Hart Lane Station accessible from the western end of Whitehall Street.

"The Mayor" means the Mayor of London

The NDP scheme is as proposed in planning permissions HGY/2010/1000-1003 and HGY/2011/2350-2351 subject to any approved detailed design changes.

Given the passage of time between the signing of this memorandum and regeneration funding being provided under paragraph 8.1, the impact of inflation on the amount made available will be kept under review to ensure the funding retains maximum impact.

*Handwritten signature and initials:*  
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JPC

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**BACKGROUND:**

- (A) A key objective of the regeneration strategy for Tottenham is the transformation of North Tottenham spearheaded by the NDP Scheme promoted by THFC. Providing homes, new public space, employment and community facilities with a new international standard Tottenham Hotspur Stadium as its centrepiece, as well as a 'premier' standard visitor experience this transformation – the North Tottenham Regeneration Programme - will focus on improving the quality of life of existing residents, attracting new residents and new facilities and encouraging the growth of local businesses. The aim is to enable residents, businesses, investors and visitors to have confidence and pride in Tottenham.
- (B) Subject to consultation with local people and businesses and to formal approval by the Council, the following 10 'Transformation Principles' are proposed to guide the preparation of the details of the North Tottenham Regeneration Programme:
1. *Phased redevelopment and improvement focused on enabling existing residents to stay in the area in better quality homes*
  2. *Expanding housing choice and supply*
  3. *Social and economic development programmes to increase educational attainment, job skills and opportunity for local people*
  4. *Fostering the growth of new and existing businesses in appropriate locations and, where moves are necessary, supporting firms to remain in Haringey*
  5. *Increasing jobs*
  6. *Sustainable development with access to new public spaces for community and cultural events*
  7. *Phased provision of supporting community infrastructure, including school places and healthcare facilities*
  8. *Increasing residents' and visitors' perceptions of safety*
  9. *Catering for the needs of visitors, maximising spend in North Tottenham while minimising adverse impacts on residents and businesses*
  10. *Maintaining strong public transport links with the wider area and modernising rail infrastructure*
- (C) THFC has invested in excess of £60m towards land purchases within the wider development and in excess of £30m towards planning applications to bring forward the NDP Scheme. THFC owns in excess of 90% of the land needed to implement the NDP Scheme and 47% of the land within the whole of the North Tottenham Regeneration Programme Area
- (D) North Tottenham is a highly sustainable location for a new Stadium and mixed-use development with the potential to accommodate up to 2,000 new homes. White Hart Lane Station is only 20 minutes from Liverpool Street Station and 4 minutes from a direct connection with the Victoria Line.
- (E) LBH granted planning permission and listed building consent for the NDP Scheme on 20 September 2011 and for the amendment applications on 29 March 2012.
- (F) LBH owns in the region of 35% of the land within the Phase 4 area and currently manages 297 dwellings in that area.
- (G) THFC has provided financial information in respect of the NDP scheme which has been reviewed on behalf of LBH by Grant Thornton. The assessment, based on the revised planning permission granted and S106 agreement relating to the revised scheme, concludes that the NDP Scheme can be financially viable.
- (H) The Mayor is providing appropriate strategic support for the North Tottenham Regeneration Programme, as set out in a letter to THFC dated 8 December 2011 and to LBH dated 16 January 2012.

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**OBJECTIVES:**

- (A) The Parties have agreed to continue to collaborate to secure the delivery of the North Tottenham Regeneration Programme.
- (B) This memorandum of understanding sets out the actions and programme of each party that will lead to delivery of the phased programme managed by LBH and THFC and delivered by best in class developers and agencies.

**THE PARTIES AGREE:**

1. To act in good faith with each other and third parties and use best endeavours to secure the expeditious delivery of the North Tottenham Regeneration Programme as set out in this memorandum.
2. This memorandum is not legally-binding and nothing in it shall constitute a fetter on the discretion of LBH, future decisions that it might make or in any other way override its public law and local government duties.

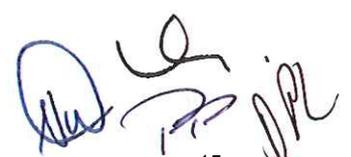
**THFC WILL:**

3. Continue its commitment to the implementation of all 3 phases of the NDP Scheme conditional only upon securing the required land and satisfactory development funding for each phase and to ensuring no legal impediment to implementation.
4. Continue to use best endeavours to acquire the remaining plots of 3<sup>rd</sup> party land needed for the NDP Scheme and start, and progress diligently, construction of each phase of the NDP Scheme as follows:
  - Phase 1 – commenced on 15 October 2012
  - Phase 2 - within 9 months of satisfaction of all of the following matters :
    - (i) securing title in all the land needed for Phase 2;
    - (ii) the resolution of all other issues (for example road closures and Rights of Light) to deliver a legally implementable scheme;
    - (iii) Bank and other financing having been agreed for Phase 2.
  - Phase 3 - within 9 months of satisfaction of all of the following matters:
    - (i) the opening of the Completed Stadium;
    - (ii) the resolution of all other issues (for example Rights of Light) to deliver a legally implementable scheme; and
    - (iii) Bank and other financing having been agreed for Phase 3.
5. Strengthen and extend existing commitments to provide employment for local people in the NDP Scheme and provide skills training and apprenticeship opportunities targeted to Tottenham residents and endeavour to offer jobs at, as a minimum, the 'Living Wage'

**LBH WILL:**

**6. Infrastructure Matters**

- 6.1. Subject to:
- the approval of the LBH Cabinet, Planning Sub-Committee or other Committees as appropriate;
  - not breaching State Aid regulations or any other legislation;
  - the stadium construction contract being let; and
  - compliance with procurement regulations and LBH standing orders.



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LBH will contribute:

- a) £3m for improvement works to heritage buildings, new public space directly accessible from the High Road frontage (including the Heritage Public Access Space – as defined in the S106 Agreement dated 29 March 2012) and other façade renovation to heritage buildings in the North Tottenham Conservation Area (2012-2014)
  - b) £5m for the creation of new community event and public space within the NDP Scheme that will be used by and will benefit Tottenham residents and community groups (2015-2016); and
  - c) subject to the receipt of funds from the Mayor, £2.5m towards the installation of a District Energy Network with sufficient capacity to serve the North Tottenham Regeneration Programme area including all necessary infrastructure connections to the NDP Scheme (2013-16).
- 6.2. Make and/or support appropriate partners (including THFC) in applications to London, national or European governmental or quasi-governmental organisations for grant or other funding to enable the delivery of the North Tottenham Regeneration Programme.
  - 6.3. Having due regard to the emerging proposals under the Local Government Resource Review, explore with the Treasury, Mayor and other organisations as appropriate the potential use and implications of a Tax Increment Financing scheme linked to the additional business rates income to be generated by the North Tottenham Regeneration Programme.
  - 6.4. Engage with and, subject to assessing any financial implications for LBH, support THFC and other appropriate partners in submitting an application to the European Investment Bank for funding towards the North Tottenham Regeneration Programme.
  - 6.5. Work with the Mayor and/or Central Government in bringing forward any planned or required infrastructure works within or in the immediate vicinity of the North Tottenham Regeneration Area.
  - 6.6. Support a bid by THFC for up to £2m. grant funding from the Heritage Lottery Fund towards improvements to heritage buildings owned by THFC.

**7. Property, Compulsory Purchase and Section 237/Right of Light Matters**

- 7.1. Subject to:
  - approval of the LBH Cabinet, Planning sub-committee or other committees as appropriate
  - not breaching State Aid regulations;
  - compliance with procurement regulations and LBH standing orders.

Enter into a Land Transaction Agreement for the NDP Scheme with THFC to ensure that the NDP Scheme has the protection provided by Section 237 Town and Country Planning Act 1990 in respect of Rights of Light claims in accordance with the Cabinet resolution of November 2010 subject to an appropriate indemnity agreement (to ensure the timeframes set out in paragraph 5 above are achieved) and set out the compensation model to be used by THFC in calculating the compensation offer to Rights of Light claimants.

- 7.2. Assist THFC in its negotiations over Rights of Light compensation (on the basis of a compensation model to be set out in the Land Transaction Agreement) with any tenants (whether under Right to Buy or other tenancies) of LBH owned properties.
- 7.3. If necessary in advance of the installation of a District Energy Network, work with THFC to identify appropriate land within Phase 4 of the North Tottenham Regeneration Programme area that could

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accommodate a Combined Heat & Power plant of sufficient capacity to serve the North Tottenham Regeneration Programme.

- 7.4. Following consultation with local residents and agreement by the LBH to detailed regeneration proposals, give full consideration to the use of CPO powers as may be necessary to secure the delivery of Phase 4.
- 7.5. Subject to consultation with local residents, support the principle of constructing a new public boulevard and square linking to a new White Hart Lane Station entrance within Phase 4 (2013-2015) and work with the Mayor in securing the acquisition of required land and properties and also make appropriate Council-owned land available as may be agreed.
- 7.6. Following consultation with residents and businesses and agreement by LBH to detailed regeneration proposals work with THFC and GLA (and other appropriate partners) to agree a mutually acceptable and legally deliverable structure to achieve land to be combined and thereby the sustainable and comprehensive development of Phase 4 to be delivered in a timely fashion.

**8. Planning and Regulatory Matters**

- 8.1. Expeditiously process all planning applications related to the North Tottenham Regeneration Programme.
- 8.2. Give due consideration to any application by THFC for necessary extended working hours during the construction phase of the Stadium recognising the need to protect the amenity of residents and the environment for businesses.
- 8.3. If appropriate, and subject to the agreement of all parties, support the establishment of a suitable Delivery Vehicle to assist the delivery of the North Tottenham Regeneration Programme.
- 8.4. Subject to consultation and determination by the Licensing Sub-Committee and assessment of the potential impacts (including the positive impacts of attracting additional visitors to the area) on residents, businesses and public safety, give due consideration to an application from THFC to increase the number of Stadium related non-football events, in particular additional concert licences.

**9. Road Closure, Street Naming and Transport Matters**

- 9.1. Subject to statutory procedures use all reasonable endeavours to secure the re-naming (to a name as may be agreed with THFC) of White Hart Lane from the junction with the High Road to White Hart Lane Station
- 9.2. Subject to statutory procedures, endeavour to secure the re-naming (to a name as may be agreed with THFC) of Whitehall Street (west from its junction with High Road to the railway line) following the completion of improvements to provide a new public square as part of the Phase 4 proposal and the construction of a new ticket hall entrance to White Hart Lane Station.
- 9.3. Work actively with the Mayor, TfL, the Dept. for Transport, Network Rail and the rail franchise operator to secure the delivery by TfL of improvement works at Tottenham Hale Station ticket hall, and create additional gateline and escalator capacity (including for the avoidance of doubt the provision of a third escalator) by 2016.
- 9.4. Work actively with the Mayor and THFC in seeking the agreement of Network Rail to the re-naming of White Hart Lane Station to a name to be agreed with THFC.
- 9.5. Seek Network Rail's agreement to fund selective door opening at Northumberland Park Station to facilitate stopping by longer trains.

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**PRIVATE & COMMERCIAL IN CONFIDENCE  
SUBJECT TO LEGAL PRIVILEGE**

- 9.6. Actively promote with Network Rail and the Department for Transport the upgrade of the West Anglia Mainline to provide enhanced match day rail services to be run to Northumberland Park Station.
- 9.7. Acknowledging that White Hart Lane is only 20 minutes from Liverpool Street Station and 4 minutes from the Victoria Line, promote with Network Rail, the Department for Transport and any future train operator the replacement of the existing rolling stock on the White Hart Lane Line (similar to the rolling stock used on the East London Over Ground Line) as part of the forthcoming franchise tender for that train operator with such upgrade to provide an increase in excess of 20% to capacity on match days and non-match days (to address growth in commuter demand).
- 9.8. Work with the Mayor and THFC to identify and provide appropriate access arrangements on adopted public highways, including the use of bus lanes, to encourage the fullest possible use of the Stadium Coach Shuttle service on match days.
- 9.9. Work with TfL to expeditiously complete the works to analyse existing and predicted traffic flows (taking into account the planned removal of the Tottenham Hale one-way gyratory system) and, depending on the results, implement a scheme to optimise traffic signalling and flows in the A10/1010 corridor from the North Circular to Monument Way taking all transport modes into account.
10. **Delivery Matters**
- 10.1. Establish a senior level North Tottenham Regeneration Programme Group with representatives of THFC, the Mayor and LBH that shall meet on a monthly basis and that shall be supported by a multi-disciplinary Project Team to detail and secure the implementation of the regeneration programme. THFC to first propose the Chair of the Programme Group for approval by LBH (in consultation with the Mayor).
- 10.2. Work with THFC in the preparation and delivery of a planning strategy for the public boulevard within Phase 4 between the proposed new White Hart Lane Station entrance and the High Road at an appropriate time to be agreed with THFC following consultation with tenants of Council owned properties and private owners affected by the proposals and use reasonable endeavours to acquire necessary properties within Phase 4 by agreement offering, where possible, relocation to the owners/occupiers.
- 10.3. Subject to the agreement of a suitable delivery structure, engagement and consultation with stakeholders and partners (including THFC) and in accordance with the agreed masterplan, agree a planning strategy to lead to a planning application for the balance of Phase 4 at a time to be agreed with THFC following consultation with existing residents and businesses and subject to an appropriate planning policy framework having been prepared and adopted taking into account the principles listed in para. B on page 2.

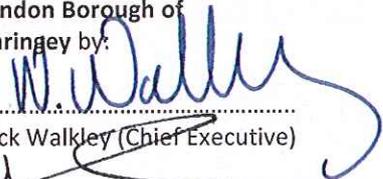
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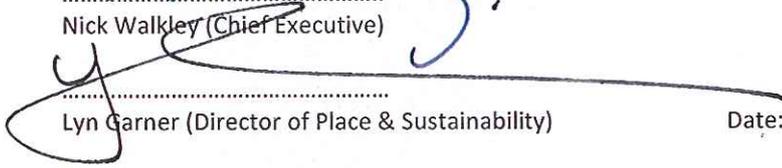
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Appendix 1  
Area Regeneration Phasing Plan

**PRIVATE & COMMERCIAL IN CONFIDENCE  
SUBJECT TO LEGAL PRIVILEGE**

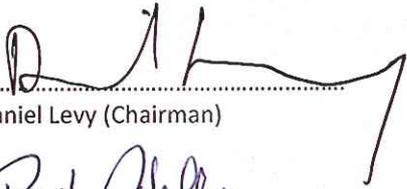
Signed on behalf of the  
London Borough of  
Haringey by:

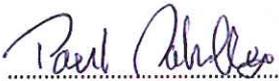
  
.....  
Nick Walkley (Chief Executive)

  
.....  
Lyn Garner (Director of Place & Sustainability)

Date: 16/01/13

Signed on behalf of Tottenham  
Hotspur Limited and Tottenham  
Hotspur Football & Athletic  
Co Limited

  
.....  
Daniel Levy (Chairman)

  
.....

Paul Phillips (Project Director)

Date: 16/01/13

3/2



Health and Safety Information  
Work started on this drawing phase was the following  
Completion

Maintenance / Cleaning / Operation

Documentation / Drawings

DATE	ISSUED
A 18/01/12	ISSUED
B 18/01/12	ISSUED
C 25/01/12	ISSUED
D 25/01/12	ISSUED

FOR INFORMATION

TOTTENHAM HOTSPUR FOOTBALL CLUB  
NORTHUMBERLAND DEVELOPMENT  
PROJECT MASTERPLAN

SITE PLAN  
OS MAP SITE BOUNDARIES

**KSS**

Scale: 1:1250

Client: Tottenham Hotspur Football Club

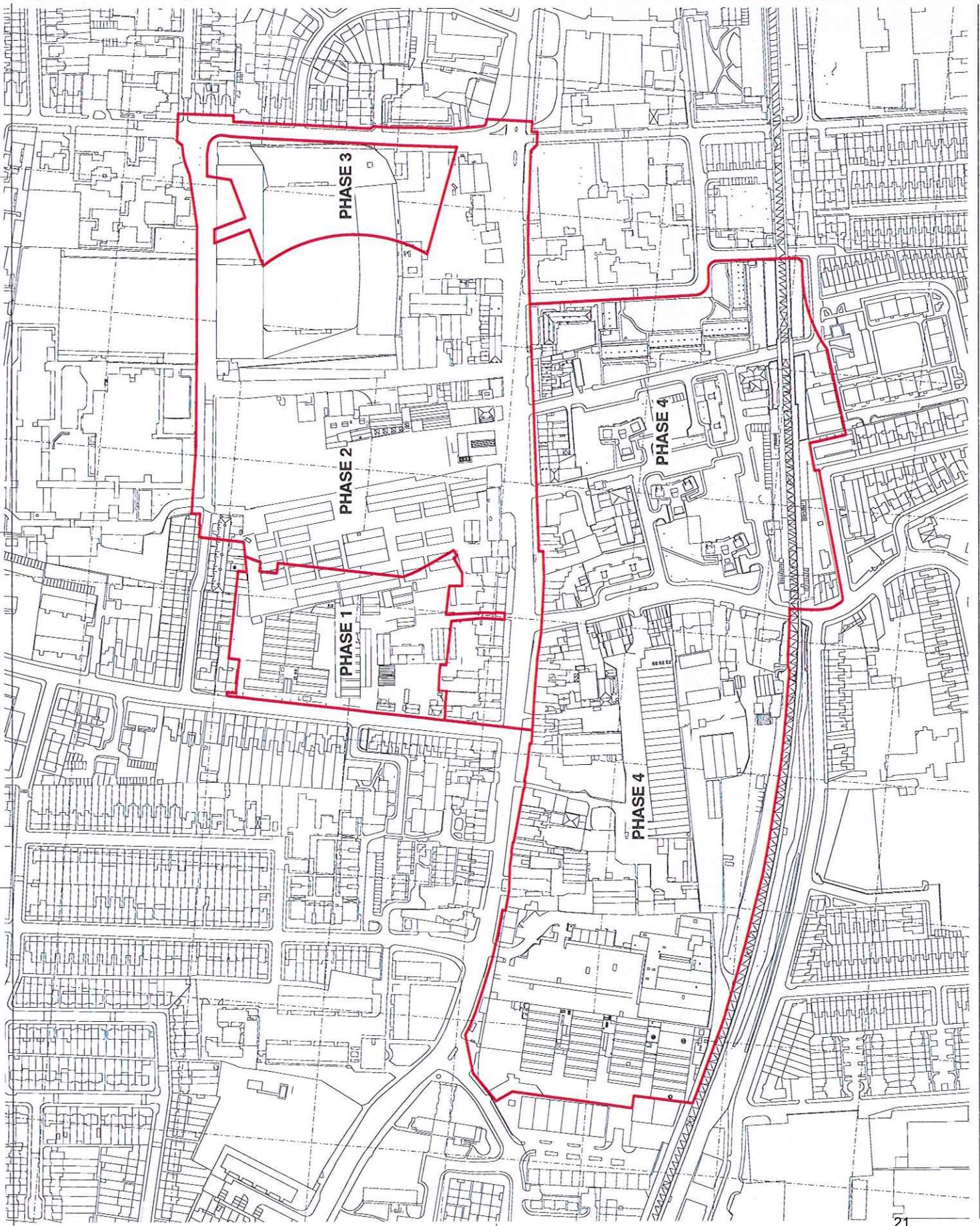
Project: Northumberland Development Project Masterplan

Date: 25/01/12

Author: [Name]

Check: [Name]

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## **Appendix D**

Plan showing location of THFC Regeneration Schemes

# THFC REGENERATION SCHEMES

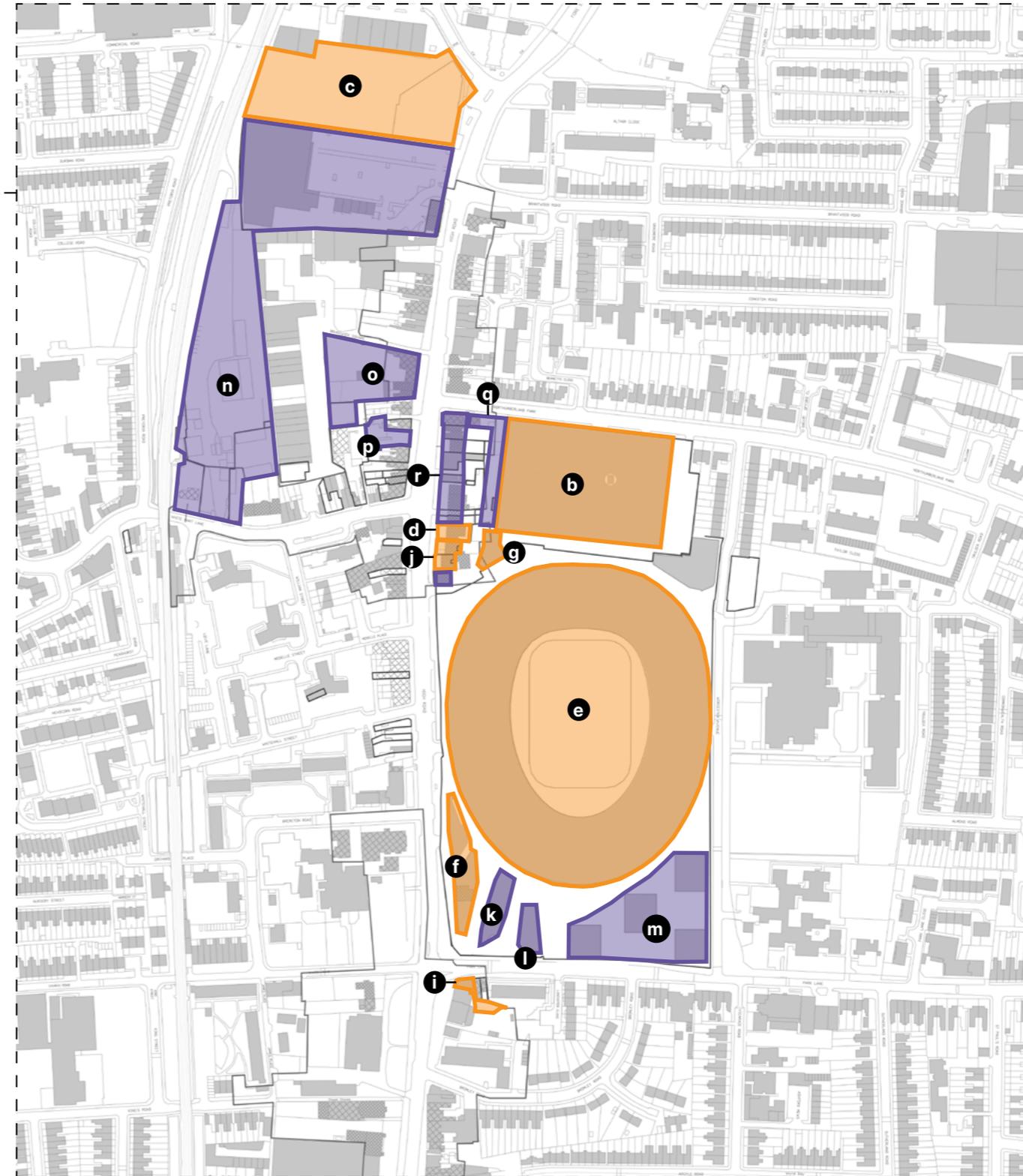
## KEY

### COMPLETED SCHEMES

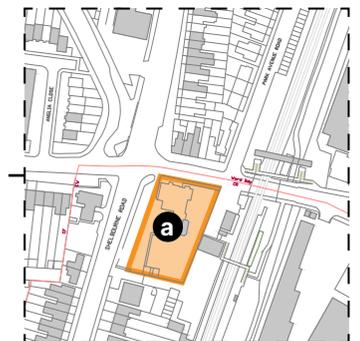
- a Berland Court
- b Lilywhite House
- c Cannon Road
- d 796 High Road (Percy House)
- e TH Stadium
- f Tottenham Experience
- g Paxton Building
- h 500 White Hart Lane
- i Corner Pin Public House
- j 792-794 High Road (Sarabande)

### PLANNING APPROVED/IN DEVELOPMENT

- k NDP - Hotel. Revised scheme submitted August 2023
- l Extreme Sports Building. Planning granted April 2016
- m NDP - Residential. Planning granted April 2016
- n Goods Yard and The Depot. Planning granted July 2023
- o Printworks 819-829 High Road. Revised scheme submitted August 2023
- p 807 High Road. Planning granted September 2021
- q Linear Building. Planning granted April 2021
- r Northumberland Terrace (remaining). Planning granted April 2021



NTS



## **Appendix E**

*Tottenham Hotspur: An analysis of the Club's socio-economic contribution to the local area*  
(EY, October 2023)

# Tottenham Hotspur

An analysis of the Club's  
socio-economic contribution  
to the local area

**October 2023**



# In this report

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1. Executive summary	4
2. Tottenham in context	7
3. Economic contribution	13
4. Social contribution	17
5. Future economic contribution	25
6. Appendix: study methodology	27

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# Foreword



**Peter Arnold**  
Chief Economist and Partner, EY

I am extremely pleased to introduce this report on the economic and social impact of Tottenham Hotspur. The opening of the Club's state of the art Tottenham Hotspur Stadium in 2019 has formed part of a wider ongoing regeneration of the area. The results are impressive – Tottenham Hotspur can be justifiably proud of the increasing impact it generates for the local economy and community.

Our analysis focuses on the 2021/22 season, which saw the return of fans after they had been unable to attend the vast majority of matches the previous season, as a result of the COVID-19 pandemic. Tottenham Hotspur makes a significant economic contribution within the local area and beyond. Overall, the Club's economic activity contributed a total of £344m in Gross Value Added (GVA) and supported over 3,700 jobs in the tri-borough area,<sup>1</sup> whilst generating £159m of tax in the UK via direct and indirect channels.

Tottenham Hotspur invests a great deal in its local community, both through its Foundation and through wider initiatives undertaken by the Club. The report highlights how the Club and Foundation harness

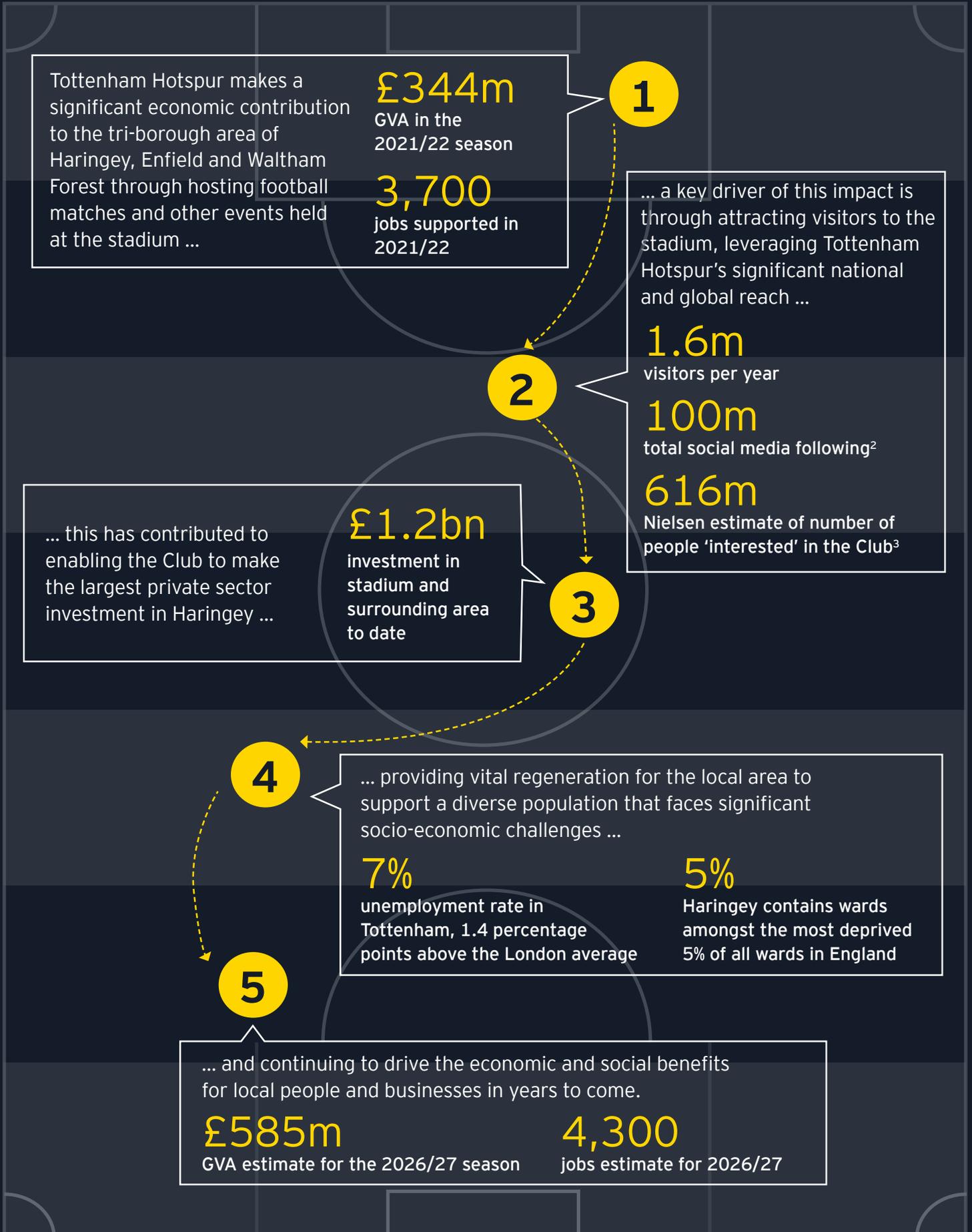
the power of football to improve the lives of youth, foster employment, develop skills, and promote sport participation, health and wellbeing.

Since the report was carried out, Tottenham Hotspur Stadium has further established itself as a leading sport, leisure and entertainment destination in London. It became the only venue to host five nights during Beyonce's Renaissance World Tour 2023 – grossing \$42.2m, the highest-grossing engagement ever by a woman, a Black artist or any American artist – as well as hosting Red Hot Chili Peppers and Wizkid shows in 2023. The stadium is also included as one of 10 host venues for the UK & Ireland's joint bid to host UEFA EURO 2028.

The Club is passionate about Tottenham and committed to improving the lives and aspirations of those on its doorstep – whether that's through free sporting activity, support for local foodbanks or sponsoring a high-performing Sixth Form College on its stadium campus. The wider stadium development has already delivered benefits within the local area and with increased footfall and further regeneration to come – this is just the start.

1. The tri-borough area is comprised of the London Boroughs of Haringey, Enfield and Waltham Forest. This area is the focus of the analysis in this report, to enable ease of comparison with the impact report commissioned by Tottenham Hotspur in 2015.

# Executive summary



2. Tottenham Hotspur.

3. Nielsen 2019/20 Premier League Club Interest study.



Tottenham Hotspur has been an integral part of the community in Haringey for over 140 years, contributing significantly both socially and economically to the Borough and the wider tri-borough area that includes Enfield and Waltham Forest.

## A significant contribution to the tri-borough economy ...

Tottenham Hotspur made a £344m GVA contribution to the economy of the tri-borough area in 2021/22 through the hosting of football matches and other events at the Stadium. This contribution was driven by attracting over 1.6 million visitors to the stadium, benefitting a significant number of local businesses.<sup>4</sup> This, in combination with the many people employed directly by the Club, saw a total of over 3,700 jobs supported by Tottenham Hotspur.

Tottenham Hotspur Stadium is versatile, hosting a wide variety of events, including football matches, NFL games, rugby matches and concerts, as well as serving as a civic building and community hub. This enables the Club to deliver socio-

economic benefits to the tri-borough area that it would not otherwise be able to.

The Club's impact is generated by direct operations, spending in supply chains, wider economic spill-over effects, and the economic benefits of attracting visitors to Haringey and the tri-borough area. Overall, Tottenham Hotspur supported 11 full-time equivalent (FTE) jobs in the tri-borough area for every 10 FTE jobs employed directly. The majority of economic benefits were realised in Haringey, the London Borough in which the Club is based.

When aggregated across Greater London, the total contribution increases to £478m and 5,100 jobs, with this activity generating £159m of tax revenues for the Government.

### London Borough of Haringey .....



### Tri-borough area .....



### Greater London .....



4. Tottenham Hotspur's economic impact was also supported by generating commercial revenues, including broadcast income of £144m.

## ... and the wider community

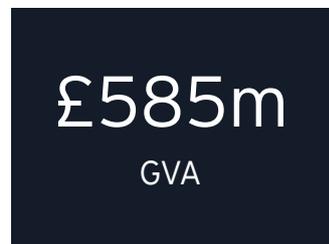
In addition to its economic impact, Tottenham Hotspur also delivers substantial social benefits to the tri-borough area, through the work of its Foundation and wider community programmes. This work is of vital importance, given the level of deprivation in the area: for example, in 2019/20, 25% of children were living in poverty, compared to 19% across London.<sup>5</sup> The Club supports positive change across the areas of health and wellbeing, education and skills, sustainability, and diversity, equality and inclusion. The Club uses football as a tool for engagement with a diverse range of people and to address issues in the community.

The Street Soccer Academy, Premier League Kicks and To Care Is To Do are examples of programmes that aim to make a positive impact in the community by mentoring disadvantaged young people who are experiencing homelessness, have grown up in the care system or are not in education, employment or training.

## Plan to expand impact

Over the next four seasons, Tottenham Hotspur projects there will be increased in-stadium and visitor expenditure as a result of an increased number of events at the stadium. This, in addition to a projected increase in commercial revenue, means that the Club's contribution to the tri-borough economy is expected to nearly double over the next five years, with GVA of £585m in 2026/27,<sup>6</sup> supporting over 4,300 jobs.

### Tottenham Hotspur's expected economic contribution to the tri-borough area in 2026/27<sup>7</sup>



5. Greater London Authority.

6. The estimated increase in GVA contribution for 2026/27 is in nominal terms, i.e. reflects projected price increases during the period between now and then.

7. Projected GVA and jobs supported figures are based solely on stadium and event impacts (including visitor tourism), and increases in commercial revenues. Wider development activities are excluded and would have impacts additional to these projections.

# 2

## Tottenham in context

### 2.1. Introduction

2.1.1 This report evaluates the socio-economic impact of Tottenham Hotspur, focusing on a tri-borough area of London which comprises Haringey, Enfield and Waltham Forest, and the wider Greater London region.

2.1.2 The tri-borough area is selected as the geographical area of focus to enable comparison to the 2015 socio-economic impact report commissioned by Tottenham Hotspur. EY's analysis is based on the 2021/22 season and informed by information provided by Tottenham Hotspur, in addition to other sources.

#### Scope of this report

The report covers the following:

##### 2.1.3 Economic impact:

**Club operations:** Tottenham Hotspur's day-to-day operations support economic activity directly, as well as local supply chains.

**Tourism:** Tottenham Hotspur attracts visitors from across the UK and abroad, for football matches, third-party events and visitor attractions hosted at Tottenham Hotspur Stadium.

##### 2.1.4 Social impact:

**Activities in the community:** various programmes that deliver improved outcomes across health, education and community cohesion.

**Key partnerships:** Tottenham Hotspur's partnerships with the local community drive important benefits for individuals engaging with the Club and associated programmes.

##### 2.1.5 Future impact:

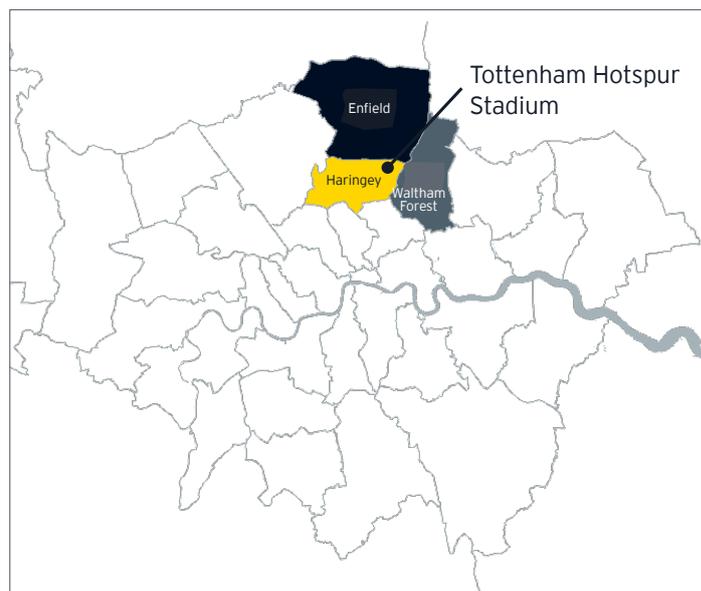
Following the opening of the Stadium in 2019, Tottenham Hotspur's impact has continued to grow. This analysis forecasts the Club's economic impact in five years' time, during the 2026/27 season.

### 2.2 Tottenham Hotspur overview

#### Tottenham Hotspur within the tri-borough area and London

2.2.1 Greater London has a population of nine million, 0.9 million of whom reside in the tri-borough area (including 0.3 million in Haringey).<sup>8</sup>

**Figure 1: Tottenham Hotspur Stadium and the tri-borough area within Greater London<sup>9</sup>**



8. ONS (2021) Estimates of the population for the UK, England and Wales, Scotland and Northern Ireland.

9. By TUBS – This vector image includes elements that have been taken or adapted from this file: CC BY-SA 3.0, <https://commons.wikimedia.org/w/index.php?curid=17530397>

## Tottenham Hotspur Football Club

2.2.2 Founded in 1882, Tottenham Hotspur is one of Europe's leading football clubs having won 14 major domestic trophies (including two league titles) and three European trophies. It is one of only six teams to have competed in the Premier League since its inception in 1992 and competed in the European showpiece Champions League final as recently as 2019.

2.2.3 Its women's team, founded in 1985, has played in the Women's Super League since the 2019/20 season, having secured promotion and gained professional status in 2019.

2.2.4 Off the pitch, the Club does a significant amount of work to benefit the local community. A core part of this is its contribution to the regeneration of the Tottenham area, led by the recent completion of Tottenham Hotspur Stadium. The Club also has a number of initiatives to promote environmental sustainability, diversity and inclusion, and to support charities and good causes. In addition, Tottenham Hotspur Foundation delivers a number of programmes for the benefit of a wide range of participants. Section 4 of this report provides an in-depth assessment of Tottenham Hotspur's social impact.

## Tottenham Hotspur Stadium

2.2.5 Tottenham Hotspur played its matches at White Hart Lane stadium from 1899 until the 2016/17 season. The Club announced plans to build a new ground (Tottenham Hotspur Stadium) in 2008, which opened towards the end of the 2018/19 season.<sup>10</sup>

2.2.6 Tottenham Hotspur Stadium has a capacity of 62,850, significantly more than the 36,300 capacity of White Hart Lane. This enables more fans to watch matches live, generating economic benefits to local businesses, as more visitors are attracted to the area to spend money. The expansion has also formed part of the London Borough of Haringey's ongoing planning aspiration to create London's next premier sports and entertainment destination.<sup>11</sup> The Stadium is multi-purpose, allowing the Club to host a number of third-party events, including NFL games, boxing matches, and concerts, bringing football and expenditure outside of matchdays, further boosting the local economy and increasing revenue coming into the Club.

## A global brand

2.2.7 Tottenham Hotspur is a globally recognised brand, with an estimated 54 million fans across the world.<sup>12</sup> The Club regularly plays pre-season matches outside of Europe to connect with its fanbase in different countries, most recently travelling to Perth, Bangkok and Singapore for matches in 2023. The club also has a combined global social media following of 100 million across all platforms.<sup>13</sup>

2.2.8 This global popularity enables Tottenham Hotspur to welcome fans from across the world for its matches. As one of only 20 Premier League clubs, Tottenham Hotspur's global profile puts the area of Tottenham on the map, and has the potential to create opportunities for inward investment that would otherwise not exist.



10. Matches were played at Wembley Stadium, the England national team's home stadium in north-west London, in the interim.

11. Tottenham Hotspur.

12. Tottenham Hotspur; Nielsen.

13. Tottenham Hotspur.

## 2.3 Socio-economic context

### Deprivation

2.3.1 Both Tottenham and the wider tri-borough area face more challenging socio-economic conditions than much of London and the UK as a whole. In 2019, Haringey contained wards amongst the 5% most deprived wards in England.<sup>14</sup> This creates a risk that parts of the local community are disenfranchised, which in turn increases the relevance of the Club's community programmes.

2.3.2 Median gross weekly pay in the tri-borough area was £631 in 2020, 17% and £130 below the London average. Tri-borough earnings increased by 21% from 2014<sup>15</sup> to 2020, by comparison to 15% for London (in nominal terms<sup>16</sup>).

2.3.3 12 years after the Tottenham Riots, North Tottenham remains the most deprived area of the London Borough of Haringey and is within the top 10% most deprived neighbourhoods in England. In addition, 20.7% of households in Haringey are considered to be overcrowded – the sixth highest in London.<sup>17</sup>

**17%**

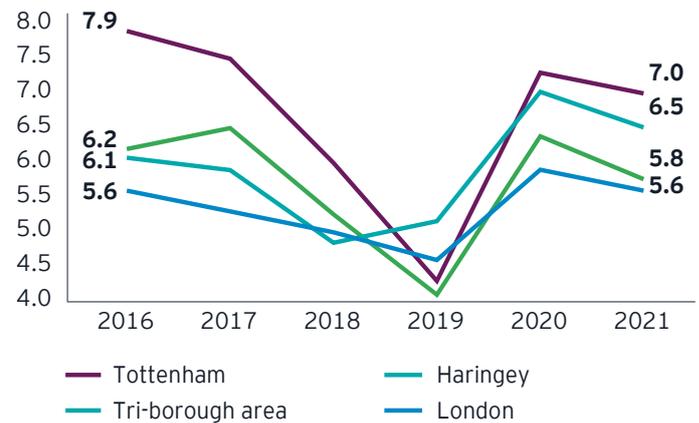
Earnings gap between the tri-borough area and London average

### Unemployment

2.3.4 Figure 2 shows that the unemployment rate has been higher in the tri-borough area than London as a whole, with the exception of 2018.

2.3.5 The COVID-19 pandemic and resulting lockdowns in 2020 meant unemployment increased throughout London. However, the tri-borough area was harder hit, leading to an increase of 1.6 percentage points (pp) – compared to 1.3pp in London generally – to a peak unemployment rate of 6.7% in 2020.<sup>18</sup>

**Figure 2: Unemployment rate, proportion of residents, 2016-2021 (%)**



Source: Office for National Statistics (ONS) UK



14. English Indices of Multiple Deprivation 2019; <https://data.london.gov.uk/blog/indices-of-deprivation-2019-initial-analysis/>

15. 2014 was the final year of the period examined in the equivalent analysis in the previously commissioned socio-economic impact of Tottenham Hotspur.

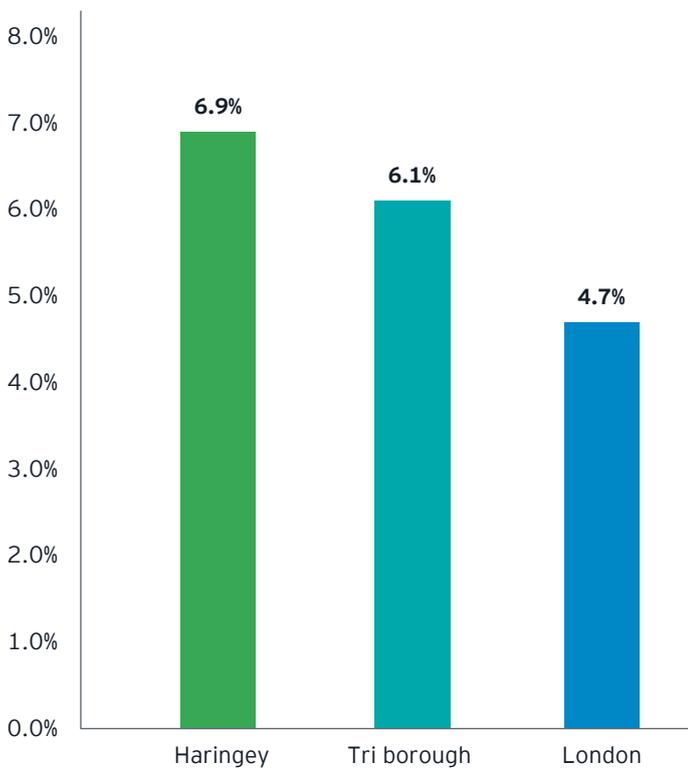
16. The stated earnings increases have not been adjusted for inflation.

17. OCSI – Census 2021.

18. Office for National Statistics (ONS) UK.

2.3.6 The number of people claiming unemployment related benefits can be reflective of a level of poverty and lower standards of living. Figure 3 shows that there is a higher proportion of the population claiming job seekers allowance and universal credit in Haringey than the rest of the tri-borough, which in turn is higher than the London average, illustrating one aspect of a challenging socio-economic environment.

**Figure 3: Claimant Count of Job Seekers Allowance and some Universal Credit Claimants (%)**

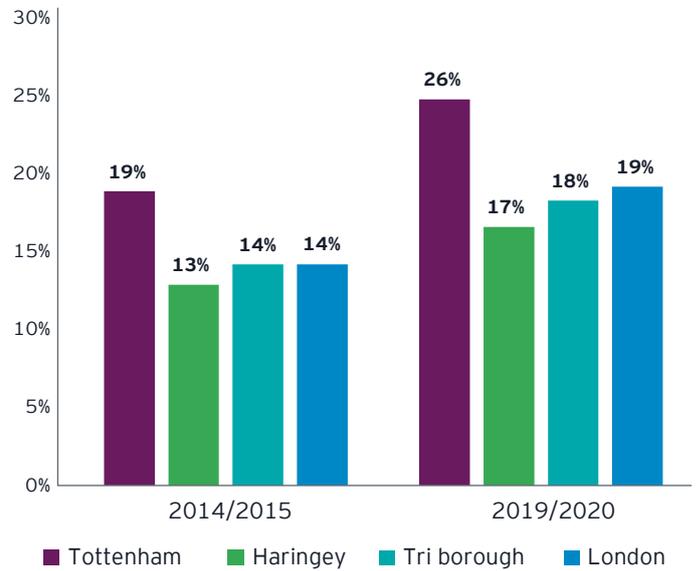


Source: ONS

### Child poverty

2.3.7 Figure 4 shows that child poverty<sup>19</sup> in Tottenham<sup>20</sup> was 26% in 2019/20, seven percentage points above the figure for London. This gap appears to be widening: in 2014/15, 19% of children in Tottenham lived in poverty, compared to 14% in London as a whole.<sup>21</sup>

**Figure 4: Child poverty (%), 2014/15 vs 2019/20**



Source: Greater London Authority

2.3.8 Tottenham Hotspur contributes to the education of children in the local area through its investment in the London Academy of Excellence Tottenham (LAET) school. LAET has had an immediate impact, increasing educational standards and attainment. Refer to Section 4.3 for further details of LAET.

### Crime

2.3.9 Crime in North Tottenham is 78% higher than the London average, including a 92% and 45% higher 'violence against the person rate' compared to London and Haringey respectively.

2.3.10 Several surveys of Haringey residents suggest that crime is prevalent enough to damage perceptions of public safety:

- ▶ 15% of residents say they feel unsafe when outside in their local area after dark.<sup>22</sup>
- ▶ Residents of North Tottenham (49%) and West Green & Bruce Grove (24%) are most likely to say they feel unsafe after dark.<sup>23</sup>
- ▶ 11% of Year 8 and 10 students in Haringey report having been a victim of violence or aggression in the area where they live in the last 12 months.<sup>24</sup>

19. Child poverty is defined as children under 16 living in low income families.

20. Tottenham is defined for the purposes of this comparison as covering the wards of Tottenham Green, Tottenham Hale, Northumberland Park, White Hart Lane and Bruce Castle.

21. Greater London Authority.

22. Haringey at a glance – State of the Borough December 2021.

23. Haringey Residents Survey 2018.

24. Health Related Behaviour Survey 2017.

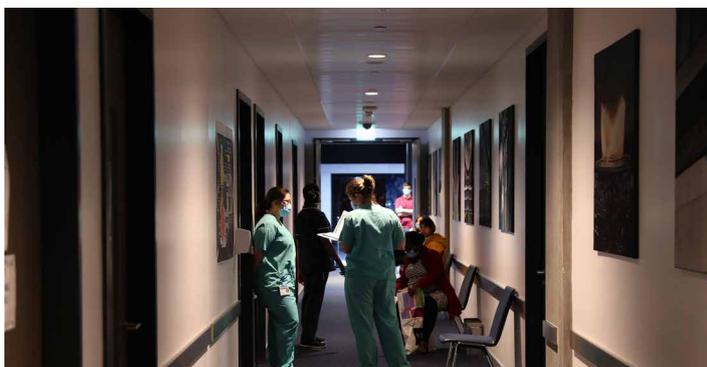
## 2.4 Regeneration: Tottenham Hotspur Stadium

### Overview

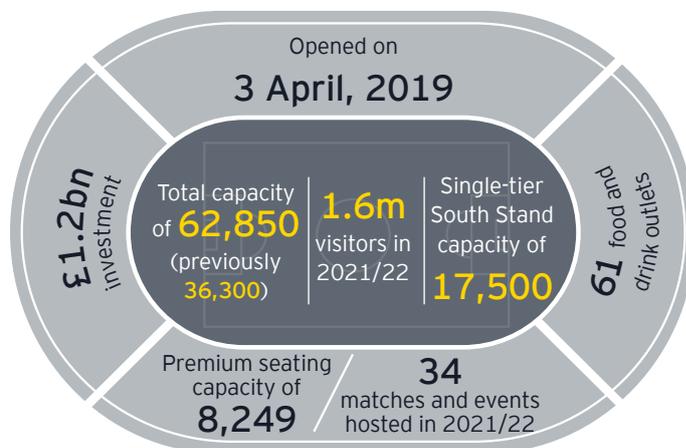
2.4.1 Tottenham Hotspur has long been embedded in the Tottenham community, having called the area home for over 140 years.

2.4.2 Following the riots of August 2011, which originated in Tottenham, the Club pushed forward with the construction of the new stadium as well as a host of associated infrastructure, including new Club offices, a new supermarket, new schools, a permanent home for the Tottenham Hotspur Foundation, and the Tottenham Experience – a seven-day-a-week leisure destination that includes the Spurs Shop, Stadium Tours and the Dare Skywalk.<sup>25</sup>

2.4.3 The new stadium forms part of the wider ongoing Northumberland Development Project (NDP), which totals £1.2bn investment by the Club to date. As well as the stadium itself, this includes development of residential, commercial and public realm elements on the surrounding land.<sup>26</sup> This represents the largest private investment Tottenham has seen.<sup>27</sup>



### The new Stadium in numbers



2.4.4 The stadium provides a civic building and community asset that extends beyond the world of sport, entertainment and leisure. Since opening:

- ▶ Nearly **9,000** local people received COVID-19 jobs at the stadium.
- ▶ **41,500** appointments were held by the North Middlesex Hospital, having temporarily transferred its Women's Outpatient Services to the stadium during the first COVID lockdown.
- ▶ The stadium accommodated drive through **COVID-19 testing** from April 2020 – February 2021.
- ▶ **A blood donation event** was held in June 2021, encouraging more people from the Black community to become blood donors.
- ▶ The stadium was Haringey **Council's hub** for the general election vote count in December 2019 and local Council elections in 2022.

“

We did not just want to build a stadium. We wanted to change the prospects for those that live in this part of London. We see it as bringing hope, prosperity and uplift to Tottenham, embracing the local community. If you live here, you should be able to study, work and play here.

Daniel Levy, Chairman, Tottenham Hotspur

25. Tottenham Hotspur, To Care Is To Do.

26. The southern end of the site is still to be developed, including a hotel, leisure facilities and residences.

27. Tottenham Hotspur.

## Northumberland Development Project<sup>28</sup>

2.4.5 The NDP is a mixed-use development project that centres around the new Tottenham Hotspur Stadium, built on the site of the old White Hart Lane stadium in 2019.

2.4.6 Phase 1 of the NDP was the Northern Development, a new five-storey building accommodating the largest central London Sainsbury's store and Gym, with 402 undercroft parking spaces in use on matchdays and non-matchdays. The upper levels are home to the award-winning London Academy of Excellence Tottenham and Tottenham Hotspur's offices.<sup>29</sup>

2.4.7 The development also includes the Tottenham Experience – home to Europe's largest Club Shop, Stadium Tours, the Dare Skywalk and Dare Skywalk Edge. Future plans include 585 new homes and a 180 room hotel, and F1 DRIVE – London, the world's first in-stadium electric karting facility, in partnership with Formula 1.

## Wider regeneration of the Tottenham area

2.4.8 The Club's history is closely intertwined with the heritage of its local area, much of which has been restored and incorporated into the wider stadium development scheme. This includes Warmington House – home to the OOF Gallery;<sup>30</sup> Percy House – the headquarters of the Tottenham Hotspur Foundation, Northumberland Terrace (home of the Sarabande

Foundation);<sup>31</sup> and the Corner Pin pub – now operated by Tottenham-based Beavertown brewery.

2.4.9 The scheme has facilitated the delivery of 400 new homes in the local area, over 70% of which is affordable housing.<sup>32</sup>

## Concerts at Tottenham Hotspur Stadium<sup>33</sup>

Tottenham Hotspur Stadium hosted five concerts from Beyoncé's Renaissance World Tour from 29 May to 4 June 2023 attracting both tourism and investment into Tottenham:

- ▶ During the week of the concerts, figures from Haringey Council show an increase in footfall on Tottenham High Road of over 104,000, an increase of 60% on the previous week.
- ▶ Chuku's, a Nigerian tapas restaurant situated on the High Road, received an £8,000 funding grant from the Beyoncé's BeyGOOD foundation in advance of the concerts.
- ▶ 500 tickets were distributed by the Club to community groups, local projects and residents.



28. Northumberland Park is a ward in the Tottenham area of London Borough of Haringey, in Greater London, England.

29. KSS Group, Northumberland Development, Haringey – Project Details.

30. OOF Gallery is a contemporary art gallery focused on football, located in Warmington House at Tottenham Hotspur Stadium.

31. The Sarabande Foundation, established by the late designer Lee Alexander McQueen, provides scholarships and studio space for artists and hosts various events.

32. Tottenham Hotspur, To Care Is To Do.

33. Tottenham Hotspur.

# 3

## Economic contribution

### 3.1 Approach to measuring economic contribution

3.1.1 Tottenham Hotspur makes a significant economic contribution to Haringey, the tri-borough area and Greater London. This is driven by the stadium's major events and visitor attractions bringing an increased number of people to the area throughout the year.<sup>34</sup> The impact of these activities can be broken down into three categories:

<b>Direct impact</b>	Resulting from the Club and the Foundation's activities, and visitors' expenditure in the stadium and at local businesses on event days. <sup>35</sup>
<b>Indirect impact</b>	The additional economic activity in the region that occurs through the Club's supply chains.
<b>Induced impact</b>	The additional activity supported by employment incomes received by Club employees and those in the Club's supply chain.

3.1.2 This report considers the economic footprint of Tottenham Hotspur, the activities of the Club and its contribution to the wider economy through visitor spending. Figure 5 overleaf presents an overview of Tottenham Hotspur's key impact drivers, which inform the analysis. It is likely that there are further impacts resulting from the Club's activities, such as through connections with the retail and media sectors, which are not fully captured within this report.

3.1.3 In addition, the analysis provides a comparison with the results within the last socio-economic impact report commissioned by Tottenham Hotspur in 2015.

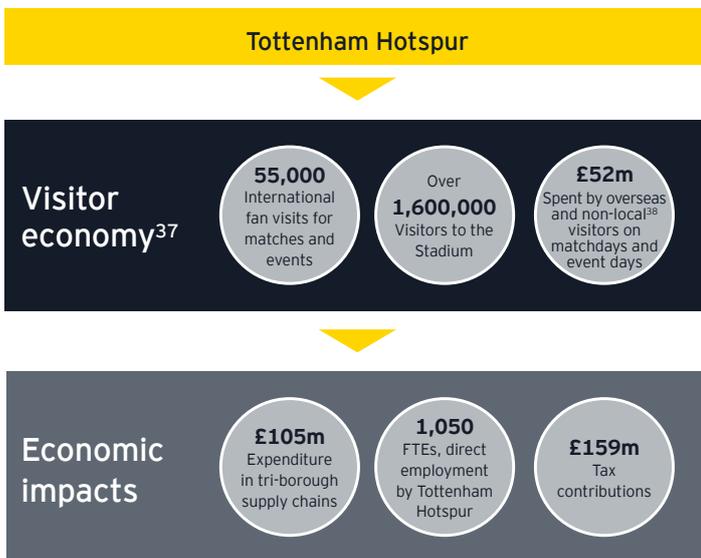
Gross value added	Employment	Tax receipts
<ul style="list-style-type: none"> <li>▶ Gross Value Added (GVA) reflects the additional value to the economy that is created from Tottenham Hotspur's presence.</li> <li>▶ This broadly equates to profits and employee salaries generated at each stage of the supply chain.</li> </ul>	<ul style="list-style-type: none"> <li>▶ The total number of full time equivalent (FTE) jobs created or supported by the total direct, indirect and induced effects of Tottenham Hotspur's presence.</li> </ul>	<ul style="list-style-type: none"> <li>▶ The revenue generated for the Exchequer as a result of the economic activity (direct, indirect and induced).</li> <li>▶ Taxes include employee income tax and National Insurance, VAT and corporation tax.</li> </ul>

34. Whilst the 2021/22 season was largely unaffected by the COVID-19 pandemic, there may have been some impact of the emergence of the Omicron variant in November and December. Many people were forced into isolation and therefore may not have attended events at the Stadium that they otherwise would have.  
 35. Direct activity also includes the activities of Tottenham Hotspur Foundation, Northumberland Park Sainsbury's Superstore, and The London Academy of Excellence Tottenham (LAET).

## Drivers of impact

3.1.4 Tottenham Hotspur's operations contribute to economic activity in Haringey and across the tri-borough area and the wider London region. The graphic provides an overview of some of the key statistics which feed into the economic impact analysis.

**Figure 5: Tottenham Hotspur, economic impact drivers in the tri-borough area<sup>36</sup>**



36. EY figures: based on analysis of Tottenham Hotspur's information, UK national accounts data and various other sources.

37. Visitor economy contributions form part of the wider GVA and employment economic impact figures reported throughout this report. All figures presented in this section relate to the 2021/22 season, unless stated otherwise.

38. Additional spend is undertaken by international visitors and 'non-local' visitors, being those who reside in the UK but outside of the tri-borough area.

39. NFL game impacts are relatively high compared to other types of third-party event, driven by significant levels of visitor spend (including hotel expenditure) and commercial activity.

## Economic impact of third-party events at Tottenham Hotspur Stadium

As well as Tottenham Hotspur football matches, Tottenham Hotspur Stadium has hosted a wide range of third-party events since opening in April 2019, including NFL, rugby, boxing and concerts.

Third-party events drive significant economic benefits to the local area surrounding the stadium, enabling greater contribution to the local economy through money spent by visitors to the stadium on accommodation, transport, food and drinks.

In addition, third-party events drive economic impacts through:

- ▶ Salaries of stadium employees
- ▶ Hire fees
- ▶ In-stadium visitor expenditure

The estimated impacts of each type of event (per event) are:

**Figure 6: GVA contribution per third-party event type (£m)<sup>39</sup>**



**Figure 7: Jobs supported per third-party event type (FTEs)**



During 2021/22 (and the following summer), the Stadium hosted two NFL games, two rugby matches, four concerts and a boxing match, generating £47m of GVA and over 700 jobs across London.

## 3.2 Gross value added

3.2.1 Tottenham Hotspur and its wider activities drive significant contributions to the local economy. These are quantified by GVA, which captures the additional economic value generated at each stage of the Club's impact.

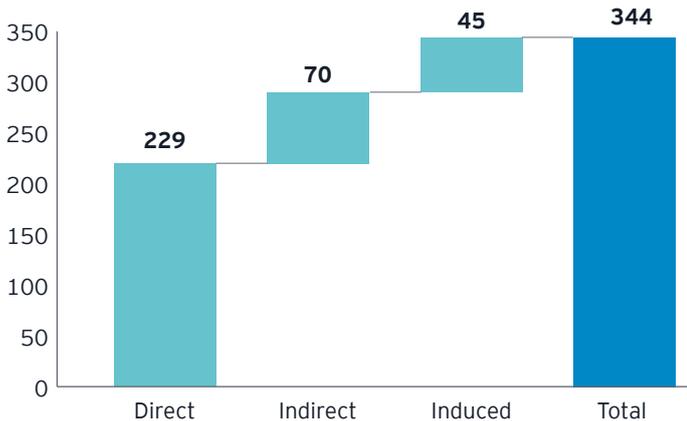
3.2.2 The starting point of our analysis is the direct GVA generated by the Club. This has two components: (i) 'onsite' activity, based on the expenditure of visitors within the stadium<sup>40</sup> and the profits earned by the Club; and (ii) 'offsite' activity, direct visitor expenditure outside the stadium in the local economy.<sup>41</sup> Each of these has knock-on indirect and induced impacts.

3.2.3 Tottenham Hotspur generated a total GVA contribution of £344m in the tri-borough area in 2021/22, including both onsite and offsite activity. £229m of this relates to the direct (onsite and offsite) impact of Tottenham Hotspur's activities. A further £70m is stimulated by spending within the Club's local supply chains and £45m from spending of employment incomes.

3.2.4 Within the London Borough of Haringey, Tottenham Hotspur contributed GVA of £296m.

3.2.5 Across Greater London, Tottenham Hotspur generated £478m in GVA.

**Figure 8: GVA contribution of Tottenham Hotspur in the tri-borough area, £m**



London Borough of Haringey	Tri-borough area	Greater London
<b>£296m</b> GVA in 2021/22	<b>£344m</b> GVA in 2021/22	<b>£478m</b> GVA in 2021/22



## 3.3 Employment

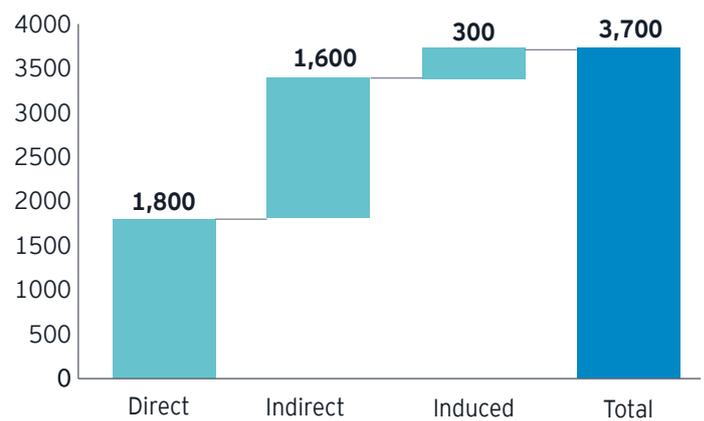
3.3.1 Tottenham Hotspur supported 3,700 FTE jobs in the tri-borough economy in 2021/22, increasing to 5,100 FTE jobs across Greater London.

3.3.2 1,800 FTE jobs were directly employed by the Club, with 1,600 supported throughout supply chains (the indirect effect) and a further 300 as a result of induced effects.

3.3.3 In Haringey specifically, the Club contributed 2,800 jobs.

3.3.4 Overall, Tottenham Hotspur supported 11 FTE jobs in the tri-borough area in total for every 10 FTEs employed directly by the Club.

**Figure 9: Total employment impact of Tottenham Hotspur, FTE jobs in the tri-Borough area**



London Borough of Haringey	Tri-borough area	Greater London
<b>2,800</b> jobs in 2021/22	<b>3,700</b> jobs in 2021/22	<b>5,100</b> GVA in 2021/22

40. Onsite activity also includes the activities of Tottenham Hotspur Foundation, Northumberland Park Sainsbury's Superstore, and LAET.

41. EY analysed data from the ONS and VisitBritain on spending patterns of domestic and international tourists in the UK to derive an estimated spending profile for visitors.

## Economic impact of NFL games at the Stadium

During the 2021-22 season, Tottenham Hotspur Stadium hosted two NFL games, generating significant economic impacts for Haringey and for Greater London. Approximately 116,000 spectators attend NFL games at the Stadium each season; around 26% of these reside in London, 51% travel from elsewhere in the UK, and 23% are from overseas (with 5% of the total travelling from the US).

Visitor expenditure assumptions were estimated based on a spectator's origin (i.e. reside in the UK or overseas) and whether or not they stayed overnight, using survey data provided by the NFL and corroborated with data from the ONS and VisitBritain on spending patterns of domestic and international tourists in the UK.



## 3.4 From White Hart Lane to Tottenham Hotspur Stadium

### GVA

3.4.1 Tottenham Hotspur's 2021/22 GVA tri-borough contribution of £344m represents a 129% real terms increase on its 2015 contribution, when the Club played its matches at White Hart Lane stadium. The increase is primarily driven by:

- ▶ Greater numbers of visitors to the area, due to the increased stadium capacity and third-party events.
- ▶ Renewed broadcast arrangements.

### Employment

3.4.2 Tottenham Hotspur's 2021/22 employment tri-borough contribution of 3,731 FTEs represents a 103% increase on its 2015 contribution. This increase is primarily driven by:

- ▶ An expansion of the Club's direct employment.
- ▶ Increased activity driven throughout the local economy as a result of more visitors coming to the area to visit the stadium.

### Tax

3.4.3 Tottenham Hotspur's 2021/22 tax contribution of £159m represents a 308% real terms increase on its 2015 contribution.<sup>42</sup> The increase is primarily driven by:

- ▶ Increased taxation paid by Tottenham Hotspur.
- ▶ Increased taxation paid by local businesses, due to a greater number of visitors to the tri-borough area and Greater London.
- ▶ Increased taxation paid throughout Tottenham Hotspur's supply chain.

Figures 10-11: Tottenham Hotspur's economic impact over time<sup>43</sup>

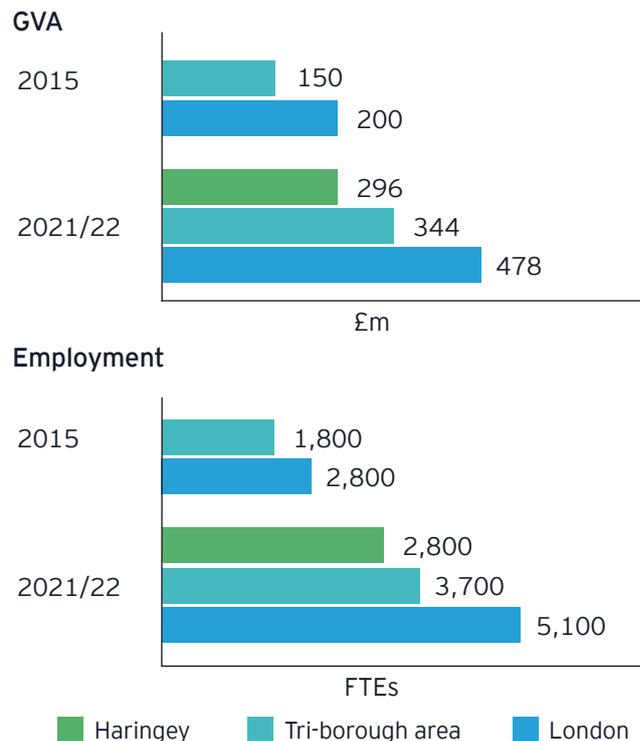


Figure 12: Tottenham Hotspur's tax contribution over time<sup>44</sup>



42. A nominal tax contribution consistent with the aggregate level of activity in the tri-borough area has been calculated. This entails using UK national accounts to estimate tax-to-GVA ratios for each tax, and applying these to Tottenham Hotspur's direct tax contributions to estimate indirect and induced tax generated by the Club's operations. The indirect and induced estimates are then added to the direct tax figure to arrive at a total tax contribution.

43. 2015 GVA figures are presented in constant 2022 prices, to remove the effects of inflation. The 2015 nominal terms GVA contribution was estimated to be £123m, in the tri-borough area and £163m across London.

44. The 2015 tax figure is presented in constant 2022 prices. The 2015 nominal terms figure was estimated to be £32m.

# 4

## Social contribution

### 4.1 To Care Is To Do

4.1.1 As a Premier League football Club with a global fanbase of millions, Tottenham Hotspur has the ability to use its unique platform to inspire and drive positive social change, advocate and raise awareness for good causes, instil a sense of pride and belonging amongst its fans, and contribute to prosperity and wellbeing to those living within the local community.

4.1.2 The Club recognises this responsibility and has a wide-ranging Corporate Social Responsibility programme at its core, focusing around the following areas:

- ▶ The Stadium-led regeneration of Tottenham
- ▶ The work of the Club's charitable Foundation
- ▶ Environmental sustainability
- ▶ Diversity & Inclusion
- ▶ Support for charities and good causes



## 4.2 Foundation programmes

**4.2.1 Established in 2007, the Tottenham Hotspur Foundation is committed to creating life-changing opportunities for people across North London.**

4.2.2 The Tottenham Hotspur Foundation has a long established and valued partnership with its local communities where there are significant socio-economic challenges. The Foundation delivers a range of creative, innovative and engaging programmes for people across the Club's local communities, strategically linked with national and local government agendas across two key areas: Youth, Employment and Skills, and Football, Sports, Health and Wellbeing. Examples of existing programmes include:



### National Citizenship Service

Tottenham Hotspur Foundation is the delivery partner in Haringey, Enfield and Barnet for a two-week programme that aims to engage, unite and empower young people, building confidence and life skills to drive achievement, regardless of background, involving a residential trip followed by social impact project planning.

“

I can whole heartedly say NCS is the best programme I've ever participated in, in my whole entire life. I completed NCS with the Tottenham Hotspur Foundation from the 1st of August to the 12th of August. Our wave leaders were incredibly nice, they came with great vibes and energy, but were also empathetic. I was feeling poorly on the first night of the residential, and immediately the next day Tayo and Jadon did what they could to help me out and I was back to feeling 100% in no time. The people that I met on this wave were amazing and I am definitely not going to forget any of them. I am grateful to the Tottenham Hotspur Foundation for hosting the NCS programme that I attended and I know my life will be better because of it. Thank you!

Crystall, National Citizenship Service participant



### Jobs Fairs

Hosted at Tottenham Hotspur Stadium, employers from a wide range of sectors are invited to exhibit job and apprenticeship opportunities to local people. The stadium held two Jobs Fairs in 2021/22, attended by over 3,500 people.

“

I was at the lowest point I could possibly be at — I thought my life was over and that nobody was going to employ someone with a criminal record. Approaching the end of my sentence, I saw that Tottenham Hotspur were recruiting in the prison I was at. I secured day-release to come to an interview and was put on a 2-week Customer Service course — from there, it's just been amazing. I've achieved so much and I'm now a Supervisor — I absolutely love it. If it wasn't for Tottenham Hotspur, I'd probably be back in jail.

Samantha, employed in the stadium on matchdays following a Tottenham Hotspur Foundation Jobs Fair



## Street Soccer Academy

Street Soccer Academy is a personal development (Mindset coaching) and soft skills improvement programme delivered over ten consecutive weeks (one session per week), typically for 17-25-year-olds who are currently experiencing homelessness. They may include previous young offenders, long term unemployed and young people Not in Education, Employment or Training (NEET).

The programme aims to improve the mindset of participants, help to identify employability areas of both capability and interest, and develop key essential soft skills so individuals taking part will be ready and able to move into work, education or further training after successfully completing the programme. The emphasis is on fun, inclusion and wellbeing with the overarching aim to help make a difference to communities and the lives of disadvantaged young people.

### Stats and Outcomes (2021-22)

- ▶ Two academy groups supported
- ▶ Total supported young participants: 24
- ▶ Total hours of support and education delivered: 80
- ▶ 92% of participants felt more positive and hopeful about their immediate future after successfully completing the Street Soccer Academy programme
- ▶ 83% of participants said they were more motivated to make a change in their life for the better as a result of successfully completing the Street Soccer Academy programme

- ▶ 100% of participants confirmed that by completing the Street Soccer Academy programme it had helped to improve their physical and mental health

Jonathan's story has been a prime example of what the programme fully represents from start to finish. He joined Street Soccer during the summer programme of 2021, initially seeming disinterested and quiet having previously been released from a football Club Academy. His interest in football was his main motivation in joining the programme. Jonathan's progression throughout his time with Street Soccer has been transformational, from being reserved and withdrawn to showing great leadership and even assisting with delivering football sessions. This year, Jonathan was offered a Traineeship with the Tottenham Hotspur Foundation, learning the different roles across all departments in the Foundation as well as continuing with the Street Soccer Academy Programme as a coach.



Jonathan, Tottenham Hotspur Foundation Trainee and Street Soccer Academy Programme coach

“

[Being released from a football club] destroyed me — I didn't know how to feel good. I fell out with my Nan, who I was living with, and ended up homeless. Imagine waking up every day thinking 'where am I going to sleep tonight?' — no-one should live like that. After spending a year on the Street Soccer programme, I've completely changed — I'm talkative and bubbly again. I realised I needed those life skills that it teaches to get myself back on my feet. I don't know where I'd be without it because I was crushed. Now I'm back to dreaming of becoming a professional footballer, or at least getting into coaching.

Jonathan Mady, Street Soccer participant

## Premier League Kicks

Through the Premier League Kicks programme, Tottenham Hotspur Foundation works with young people at risk of becoming victims or perpetrators of serious youth violence, empowering participants through the delivery of bespoke workshops and activities based on individual needs. The programme inspires children and young people to achieve their potential and improve their wellbeing; working together to build stronger, safer and more inclusive communities.

“

I have been a part of this programme since the age of 14 and it has helped me become the person I am today. I have loved the journey from a Kicks participant, all the way through to now being a coach and I look forward to running more sessions with many more incredible young people.

Jadon Anderson, came through the Kicks programme and is now employed as a Global Football Development coach



## NHS Health Checks

Based at community venues such as sports centres and libraries, delivered by our 'Spurs Nurse' with the aim of using the appeal of football to target men aged 45+ who are reluctant to visit a GP.

“

If it wasn't for the Spurs Nurse getting me to stop smoking, I'd have lost my leg.

Peter, a beneficiary of NHS Community Health Checks

## To Care Is To Do

Flagship programme supporting children growing up in care, young adults leaving the care system and those who have left it, through mentoring, work experience and extra-curricular activities such as days out and cookery classes.

This programme is needed as children in care are statistically less likely than their peers to achieve top grades throughout all years of school. Research shows that 40 per cent of care leavers aged 19 to 21 are not in education, employment or training (NEET), compared to 13 per cent for this age group overall.

In 2021, the number of children looked after (CLA) by local authorities in England rose to 80,850, up 1% on the previous year and continuing the rise seen in recent years. Approximately 400 of these children reside in the local borough of Haringey.

To Care Is To Do delivers a range of personal development and enrichment activities including money management courses, social events and days out, cultural visits and counselling. In 2021/22, this programme achieved:

- ▶ 135 nominations for the Haringey Academic Achievement Awards (based on learning achievements and community engagement)
- ▶ 20 referrals for 1-2-1 mentoring based on a 12 week model of confidence building, public speaking, career development and transition into college/school.
- ▶ 83 individuals engaged in group sessions
- ▶ 63 1-2-1 and group sessions delivered

“

Going into care was tough but Spurs supported me along my journey. I'm now in the Sixth Form and hoping to go to University.

Wisdom, To Care Is To Do participant



Tottenham Hotspur Foundation has delivered To Care Is To Do for more than 15 years as it aims to help reduce the gap in educational achievement between children in care and their peers.

## Shape Up With Spurs

A free health and activity programme delivered at community centres within Haringey and Enfield to promote health and wellbeing amongst local residents. Sessions include boxercise, yoga, pilates and cardio classes.

“

I never miss a session. The first time I came here, I was very nervous as I hadn't done anything for myself for such a long time, but the group was so welcoming. I left feeling so good that I just wanted more. We're all of different abilities and you don't worry about coming here — it's all inclusive. If I had to pay for these sessions, I wouldn't be able to afford it — it's fantastic and long may they continue.

Dawn, Shape Up With Spurs participant



4.2.3 The table below highlights additional Tottenham Hotspur Foundation programmes across its focus areas.

Programme	Overview
<b>Premier League Primary Stars</b>	Using appeal of football to inspire children to learn, be active and develop important life skills, Foundation coaches deliver educational sessions to help build students' confidence in the classroom, using examples from football to improve communication.
<b>Premier League Inspires</b>	A 10-week educational programme aimed at inspiring and motivating young people aged 11-16 who are disengaged at school, using the theme of football and sport to improve their attitude, relationships, and behaviour.
<b>Move 4 You</b>	Supports those living with and beyond cancer to remain active during and after treatment through a 12-session programme delivered by a specialist rehabilitation instructor, tailored to individual needs.
<b>Employment Drop-in sessions</b>	Hosted every Thursday at Percy House to allow residents to meet with an employment advisor who can support with CVs and interview preparation.
<b>Spurred 2 Coach</b>	A 6-week project which offers individuals the opportunity to get into football coaching and gain an FA Level 1 Qualification.

## 4.3 The London Academy of Excellence Tottenham

4.3.1 As part of the development of Lilywhite House, adjacent to the stadium, the Club decided to create an elite educational facility to sit alongside its new Club offices.

4.3.2 LAET is a state-funded Sixth Form, sponsored by the Club and Highgate School – the principal academic sponsors – who together with support from other leading independent schools, deliver expert teaching.

4.3.3 It prioritises local students most likely to benefit from an academically-rigorous curriculum and those from disadvantaged socio-economic backgrounds, giving Tottenham's brightest students the best possible chance of accessing top universities.

4.3.4 This is in the context of the school being situated within one of the 2% most deprived wards in the country, with 63% of its student body coming from the lowest two social groups, – being described as living in “struggling estates” or “difficult circumstances” – using the ACORN tool for socio-economic analysis.



## Key Achievements

1

LAET was named the **Sunday Times Sixth Form College** of the Year, 2020 by Parent Power, The Sunday Times School Guide

2

In 2022, LAET achieved an '**Outstanding**' Ofsted rating across all areas

3

A-Level results have continued to improve year-on-year, with 2023 seeing an incredible **37% of grades** either A\* or A with 72% A\*-B – both significantly above national averages

4

Nearly **three quarters of students** have gone onto **Russell Group Universities** compared to 1% of Tottenham school leavers the year before LAET opened, with 45 students winning places at the Universities of Oxford or Cambridge since the school opened in 2017 and others electing to undertake prestigious apprenticeships

5

The achievements put LAET within the **top 2%** of state Sixth Forms nationally



# 5

## Future economic contribution

number of events at the stadium

### 5.1 Future economic impact

5.1.1 This section of the report assesses the economic impact that Tottenham Hotspur is anticipated to deliver for Haringey, the tri-borough area and across London over the next five seasons.

#### GVA

5.1.2 Tottenham Hotspur's GVA tri-borough contribution is forecast to grow to £585m by the 2026/27 season, an increase of 70% over five seasons (in nominal terms). The increase is primarily driven by:

- ▶ Increased in-stadium visitor expenditure
- ▶ Wages and salaries paid to an increased number of local non-playing staff
- ▶ Renewed sponsorship and commercial arrangements.

5.1.3 The Club's GVA impact in the London Borough of Haringey is anticipated to grow from £296m in 2021/22 to £549m in 2026/27. Across London, the GVA impact during this period is forecast to increase from £478m to £748m.

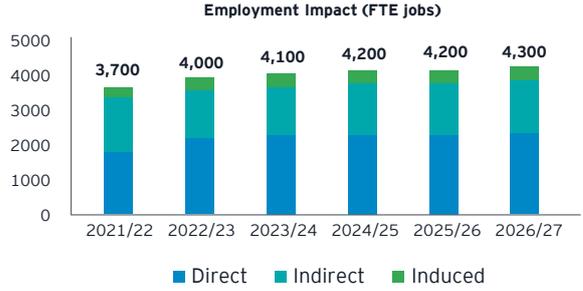
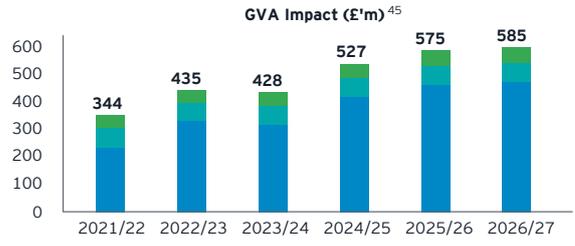
#### Employment

5.1.4 Tottenham Hotspur's tri-borough contribution in terms of employment is forecast to grow to nearly 4,300 FTEs by the 2026/27 season, an increase of 16% over five seasons. This increase is primarily comprised of an expansion of the Club's non-playing staff employment.

5.1.5 The number of jobs supported by Tottenham Hotspur in the London Borough of Haringey is forecast to grow from 2,800 in 2021/22 to 3,100 in 2026/27. Across London, the Club's employment may increase from 5,100 to 5,700 in the same period.

Figures 13-14: Tottenham Hotspur's forecast tri-borough economic impact over time

London Borough of Haringey	Tri-borough area	Greater London
<b>£549m</b> GVA in 2026/27	<b>£585m</b> GVA in 2026/27	<b>£748m</b> GVA in 2026/27
<b>3,100</b> jobs in 2026/27	<b>4,300</b> jobs in 2026/27	<b>5,700</b> jobs in 2026/27



45. The reduction in GVA in 2023/24 reflects reduced revenue growth as a result of not playing European football in that season.

## 5.2 Future development plans

5.2.1 In addition to the significant investment that has been made in developing the Tottenham area to date, Tottenham Hotspur plans to develop nearly 1,500 new homes, a 180-bed hotel, leisure and cultural facilities.

5.2.2 These developments will drive economic activity in the tri-borough area through several channels:

- ▶ An increase in the population, with new homes likely to attract residents from outside the tri-borough area, thereby helping increase demand for local business.

- ▶ Increased local tourism, as visitors to the area make use of the hotel. This would generate income for the hotel itself, as well as increasing footfall for local businesses.
- ▶ New leisure and cultural facilities would have a similar impact, generating income directly and attracting more visitors to the tri-borough area. Fresh guidance from the Department for Levelling Up, Housing and Communities values the amenity impact of placemaking as part of a wider urban regeneration scheme.

### Planned future developments

#### Goods Yard

Providing up to 500 new homes, including affordable homes, delivered across seven buildings. It will also include new public green spaces for the community to enjoy.

#### The Depot

Providing up to 400 new homes, including affordable homes, across four new buildings. It will also include well-designed new green spaces and a public realm, including a brand-new park, and the sensitive restoration of the Grade II listed building at 867-869 High Road.

#### Printworks

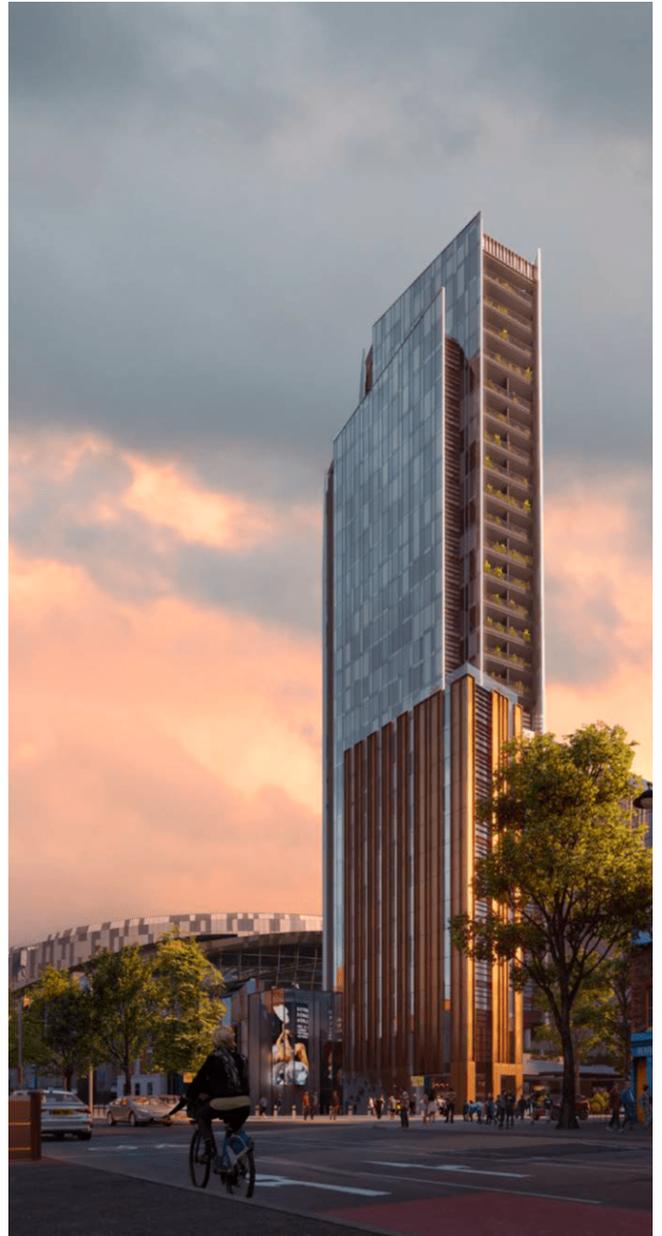
Providing a new purpose built high-quality student accommodation supported by commercial units and associated amenity spaces.

#### PAXTON17

The vision is for a vibrant commercial quarter where an infrastructure of restored and new buildings facilitates the development of a creative eco-system. PAXTON17 is already home to the Sarabande Foundation as well as F3 Architects, who were commissioned to design the internal spaces within Tottenham Hotspur Stadium. Future plans include the arrival of further arts and culture organisations building on Tottenham's reputation for producing some of the most prominent artists in the music industry today, fundamental to the London grime scene.

#### Hotel

The Club submitted a revised planning application in August 2023 for a circa. 180-room, 29-storey hotel, with 49 residential serviced apartments and 80 car park spaces.





# Appendix

## Study methodology

### Economic impact

This report assesses the economic footprint of Tottenham Hotspur, based on the range of activities the Club undertakes. These activities include day-to-day commercial operations, matchday activities, hosting third-party events at Tottenham Hotspur Stadium,<sup>46</sup> and delivering community programmes. The impact of visitors attracted to the tri-borough area and their incremental spending is also captured in our analysis.

We have considered the economic impact of both 'onsite' and 'offsite' activity. Onsite activity comprises the expenditure of visitors across the Tottenham Hotspur Stadium campus, as well as the profits earned by the Club, whilst offsite activity relates to visitor expenditure outside the stadium with local businesses.<sup>47</sup> Across this activity, direct, indirect and induced impacts have been estimated. These impacts are described below.

#### Direct economic impacts

The direct impacts are based on information provided by Tottenham Hotspur and the NFL regarding operational costs, investment, tax liabilities, income, employment and event attendance. This information supports an assessment of the economic activity generated directly by Tottenham Hotspur. That is, the activity that results most immediately from Tottenham Hotspur's activities. This includes:

- ▶ Employment within Tottenham Hotspur, as measured by full time equivalents (FTEs).
- ▶ GVA of Tottenham Hotspur, measured using the income approach (the sum of gross operating surplus, compensation of employees and net taxes on production).
- ▶ Tax revenue generated, including income tax and national insurance contributions.

Direct employment and GVA impacts are broken down by geography based on the primary location of the underpinning

activity to provide impact estimates across the tri-borough area and London as a whole.

#### Indirect and induced impacts

The impact assessment includes not only the direct economic impact resulting from Tottenham Hotspur's activities, but also the economic activity stimulated through its supply chains (i.e., the indirect impacts) and additional activity supported by employment incomes and consumer spending (i.e., the induced impacts). This assessment is informed by a breakdown of Tottenham Hotspur's supply chain expenditure, which is categorised by major economic sector.

Indirect and induced impacts are estimated using EY's economic impact model, which estimates the GVA and employment 'effects' driven by direct sector spending. These effects show the further rounds of impact on the local or national economy for each £1 of supply chain expenditure.

The effects are driven by the structure of the local economy, including the extent to which the local economy relies upon imports from abroad and from elsewhere in the UK. This follows the input-output framework pioneered by Wassily Leontief and is based on national and local economic accounts.

#### Additionality

The economic footprint analysis presents a snapshot of Tottenham Hotspur's impact at a point in time. The analysis does not therefore seek to make adjustments or allowances for the additionality of impact, other than to attribute impacts to the geography within which they are expected to take place.

#### Future impacts

The future impact assessments in Section 5 of this report are calculated by applying EY's economic model to Tottenham Hotspur's forecast financials.

46. The direct impacts for visitor spending are based on: (1) event delivery (Stadium campus spend): for all events, revenue data provided by THFC; and (2) wider visitor expenditure, using third-party data. For concert impacts, EY analysed existing research on visitor spending from UK Music's flagship report, Music by Numbers 2020 and a third-party study for assessing the economic impact of concerts. For NFL and boxing impacts, EY analysed data from the ONS and VisitBritain on spending patterns of domestic and international tourists in the UK, to derive an estimated spending profile for visitors. EY verified and refined NFL inputs using data from the NFL. For operational event delivery, the costs incurred by THFC are included as part of the impacts.

47. EY analysed data from the ONS and VisitBritain on spending patterns of domestic and international tourists in the UK to derive an estimated spending profile for visitors.

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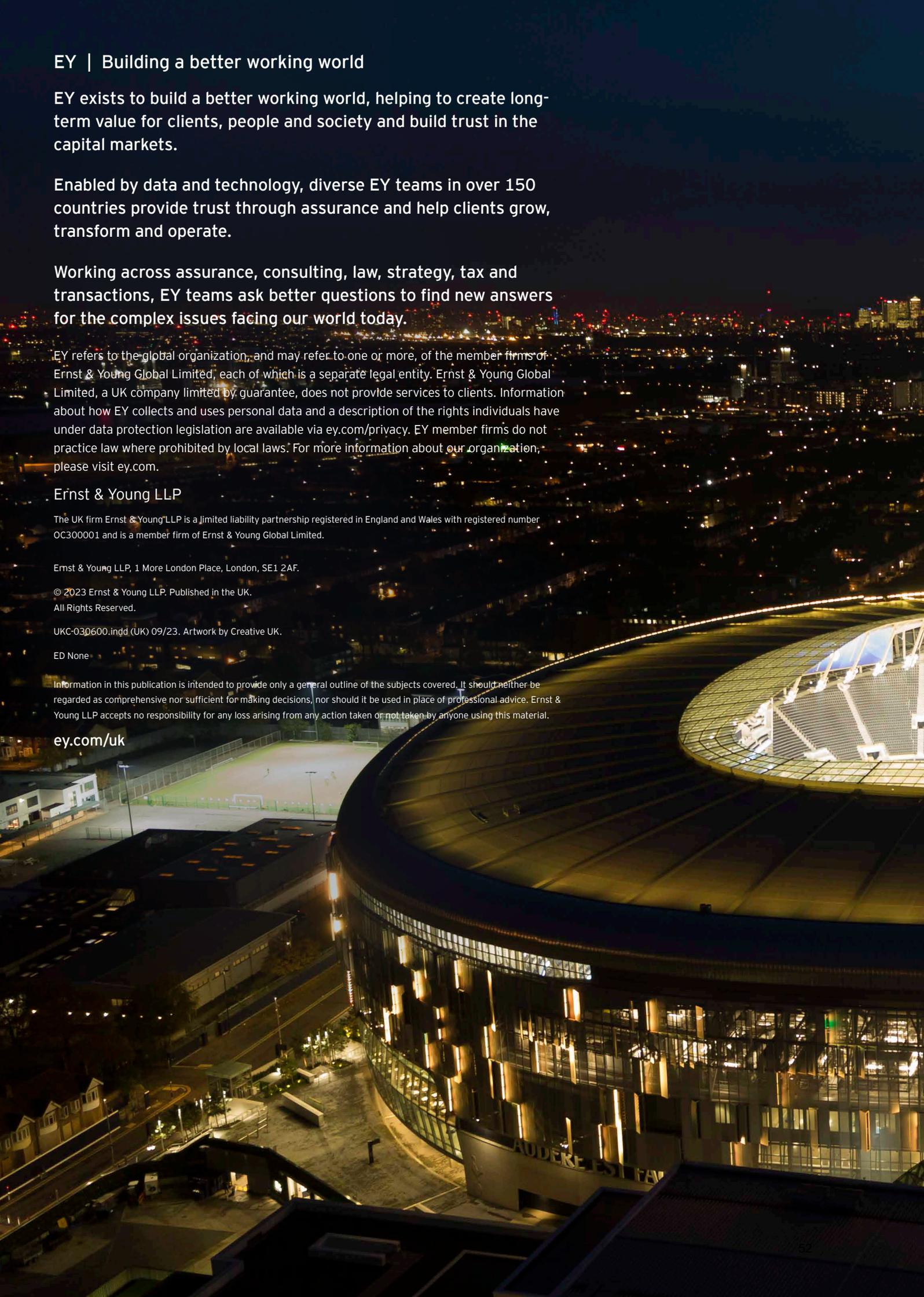
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ED None

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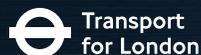


## **Appendix F**

Events at the new stadium – a guide for local residents and businesses (Summer 2019)

# TOTTENHAM HOTSPUR STADIUM

Events at the new stadium – a guide for local residents and businesses





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# INTRODUCTION

Tottenham Hotspur Football Club is proud to be part of Tottenham's vibrant community and the new stadium development continues to be a catalyst for positive change and regeneration in North Tottenham, creating a new sports, leisure and entertainment destination for London. You will have seen the new stadium emerge around the old ground and we are now in the final stages of the construction programme before moving back home for the 2018/19 season.

The new stadium will have a capacity of just over 62,000 and will be a multi-purpose sports, leisure and entertainment destination hosting Tottenham Hotspur home matches alongside a minimum of two NFL matches per year and a number of other events and concerts.

It will also sit alongside the Tottenham Experience and once both are complete, we shall also begin work on the new hotel, an extreme sports hub and new homes.

Much of the enhanced public transport infrastructure for the new stadium is already in place. It will be a public transport destination, well served by bus routes and within walking distance of four rail stations. Tottenham continues to benefit from significant investment in its public transport infrastructure, which will provide improved services every day of the year.

#### THIS INCLUDES:

- **An upgraded Victoria line** – completed in 2017 with new signalling and rolling stock providing one of the highest frequency underground services in the world, serving both Seven Sisters and Tottenham Hale stations.
- **Works to improve Tottenham Hale station** – with the creation of a new combined train and tube station entrance to be completed during 2019.

- **An upgraded White Hart Lane station** – with additional stairs and lift access, making the station step-free, due for completion during summer 2019. Alongside this, a fleet of new high capacity, air conditioned trains will be introduced from spring 2019. There will also be an enhanced timetable for every event day.
- **A redeveloped Northumberland Park station** – with improved accessibility due for completion during autumn 2018 and increased service frequencies from summer 2019 as part of the three-tracking project between Stratford and the new Meridian Water station.
- **The opening of the Elizabeth line (Crossrail) in 2019** – which will improve connectivity to the new stadium with another transport choice via Liverpool Street station.

London Borough of Haringey and the Club are also improving footways and road surfaces leading up to the new stadium, and the Club is helping to make travel on event days even better, with a host of new measures including new shuttle buses, regional coaches, additional staff, traffic and pedestrian signage, cycle parking and more.

#### 'BEDDING-IN'

Supporters and local residents are well-used to travelling to and around Tottenham on event days. However, there will naturally be a 'bedding-in' period for the first few home games as we understand how and when supporters choose to travel and the remaining public transport works are completed. There are more options for supporters so it may take time for them to research and change their travel habits.

The Club has been working closely with the London Borough of Haringey (LBH), the London Borough of Enfield (LBE), Transport for London (TfL), Abellio Greater Anglia Trains (GA), the Metropolitan Police (MPS), the British Transport Police (BTP), the National Football League (NFL) and others to agree how we best manage crowds and the impact on local transport during this 'bedding-in' period and beyond.

This includes developing various event day plans, as well as committing to new measures for the opening of the new stadium.

One of the most significant of these is an ambition to increase the proportion of people who travel to an event by public transport.

This booklet has been produced to provide you with information regarding travel and road traffic management for events at the new stadium. Please keep it so that you can refer to it in the future. The Club is committed to publicising details of each event in advance.

Please see details of how you can stay informed at the back of this booklet and visit the Club's website [tottenhamhotspur.com/local](http://tottenhamhotspur.com/local). We shall of course be closely reviewing and monitoring how the stadium operates over the course of the next three to five years and making any changes when they are needed.

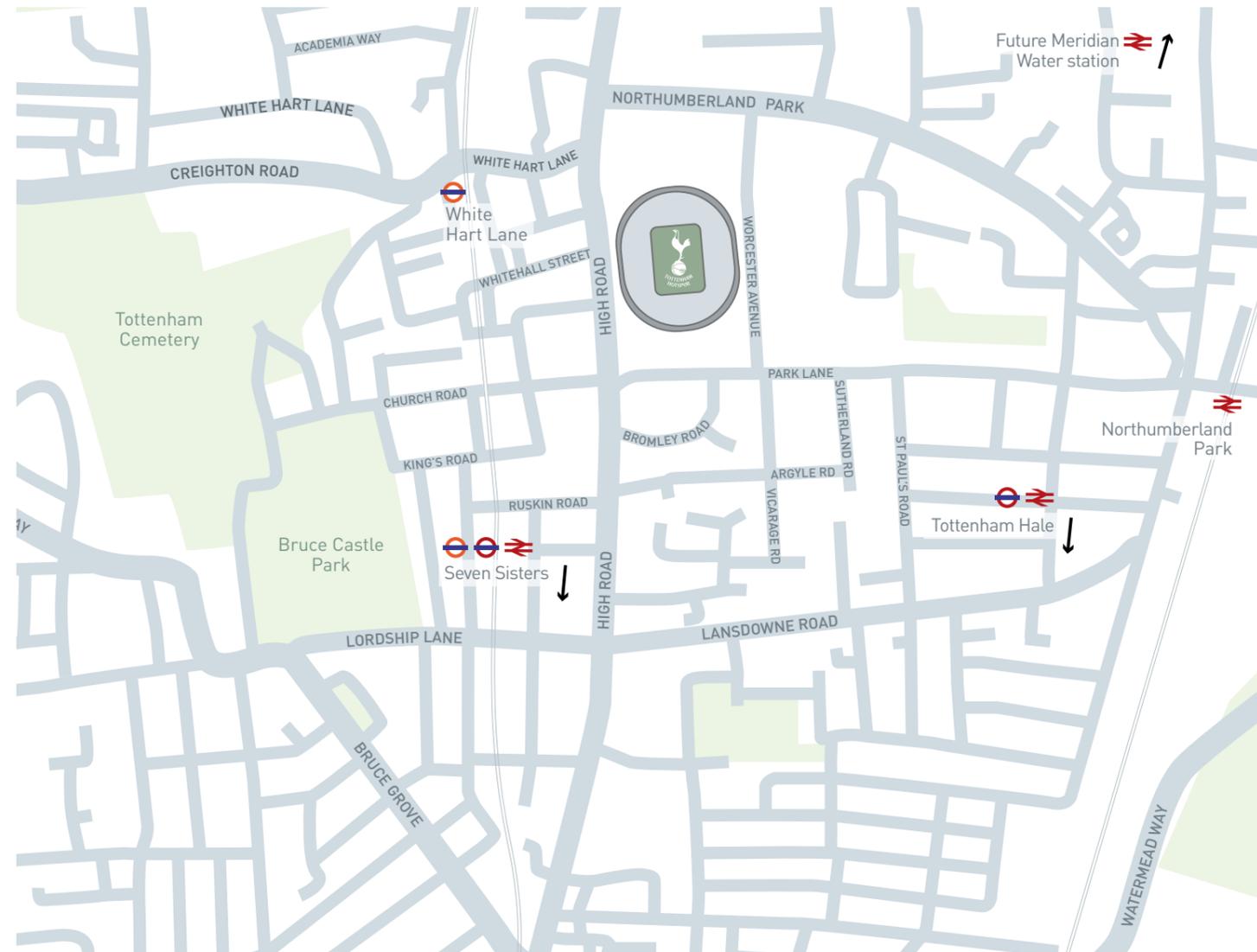
If you need to report any issues with the stadium's operation, or anti-social behaviour and litter, you can do so via our website [tottenhamhotspur.com/feedback](http://tottenhamhotspur.com/feedback).



## WHERE IS TOTTENHAM HOTSPUR STADIUM?

Tottenham Hotspur Stadium is located between Tottenham High Road, Park Lane and Worcester Avenue.

It is a public transport destination, well served by bus routes and within walking distance of four stations – White Hart Lane, Northumberland Park, Seven Sisters and Tottenham Hale – with a fifth, Meridian Water, opening in spring 2019.



## HOW WILL WE MANAGE EVENT DAY IMPACTS?

The new stadium will be Tottenham Hotspur's home for generations to come and we want to ensure that it is both safe and secure whilst any impact on the local area is minimised and managed as carefully as possible.

Many of you are well-used to living and working alongside the old stadium, however the new stadium is much larger and there are additional safety and security challenges, so we have had to make a number of changes to our event day operations. This includes new national and safety guidance on how quickly a venue should be able to evacuate in the event of an emergency.

This means extended road closures, new crowd management measures between the stadium and our local stations, bus diversions and parking controls will be put in place.

We are also introducing new, free pre-booked shuttle bus services to the stadium from Alexandra Palace and Wood Green stations to provide even more travel choices for supporters.

Local train stations will face greater impacts, especially during the 'bedding-in' period and whilst station upgrades are completed.

Seven Sisters, White Hart Lane and Northumberland Park stations will continue to be primary stations for supporters and Tottenham Hale will be used more frequently as works near completion.

A new regional coach network and improved coach parking facilities, as well as greater cycle parking will help ease any queuing at the four main stations.

The stadium itself will also host more event day activities, even after an event or match has finished. This will help spread the flow of supporters exiting the area and encourage more spending at local businesses.

The Club will provide additional marshals and 'Fanbassadors' to manage supporters every step of the way and are working closely with the Metropolitan Police Service, London Borough of Haringey and TfL to ensure more staff than ever are at stations and other key areas.

These measures and those detailed over the next few pages will all help to minimise disruption to the local area and ensure you are well aware of how the stadium will work so that you can plan your travel.

You may wish to avoid the busiest times before and after events as your journey will be quicker and less crowded if you do. For example, the Victoria line and Overground services will be particularly busy. Please check TfL's journey planner [tfl.gov.uk/plan-a-journey](https://tfl.gov.uk/plan-a-journey) before travelling.

If you do need to travel and are using your vehicle, you should plan ahead to avoid the areas affected by road closures. Please allow plenty of time for your journey.

To help you plan ahead please keep an eye on the Club's website [tottenhamhotspur.com/matches](https://tottenhamhotspur.com/matches) for home games and any other events programmed. Please note the current fixture list could change as broadcast selections are made and cup fixtures are confirmed. You can register for updates via [tottenhamhotspur.com/local](https://tottenhamhotspur.com/local).



# WHICH LOCAL ROADS WILL BE CLOSED?

As before, we shall need to close some roads closest to the stadium before, during and after an event to make it safe for visitors, residents and businesses, and for emergency access to the area.

However, because of the enhanced facilities offered at the new stadium, we are expecting supporters to arrive earlier than they have done previously, with approximately 80% potentially in or around the stadium an hour before the start of an event.

More rigorous safety requirements for modern stadiums have also been introduced, leading us to reduce the time it takes to evacuate all supporters. In the event of an emergency evacuation, a greater area (including the High Road) will be required, which means extending the timeframes of the existing road closures.

During event days, general traffic will not be able to access parts of the High Road between White Hart Lane and Lordship Lane/Lansdowne Road from two hours before and one hour after the event and will be diverted along the routes marked on the plans on page 9.

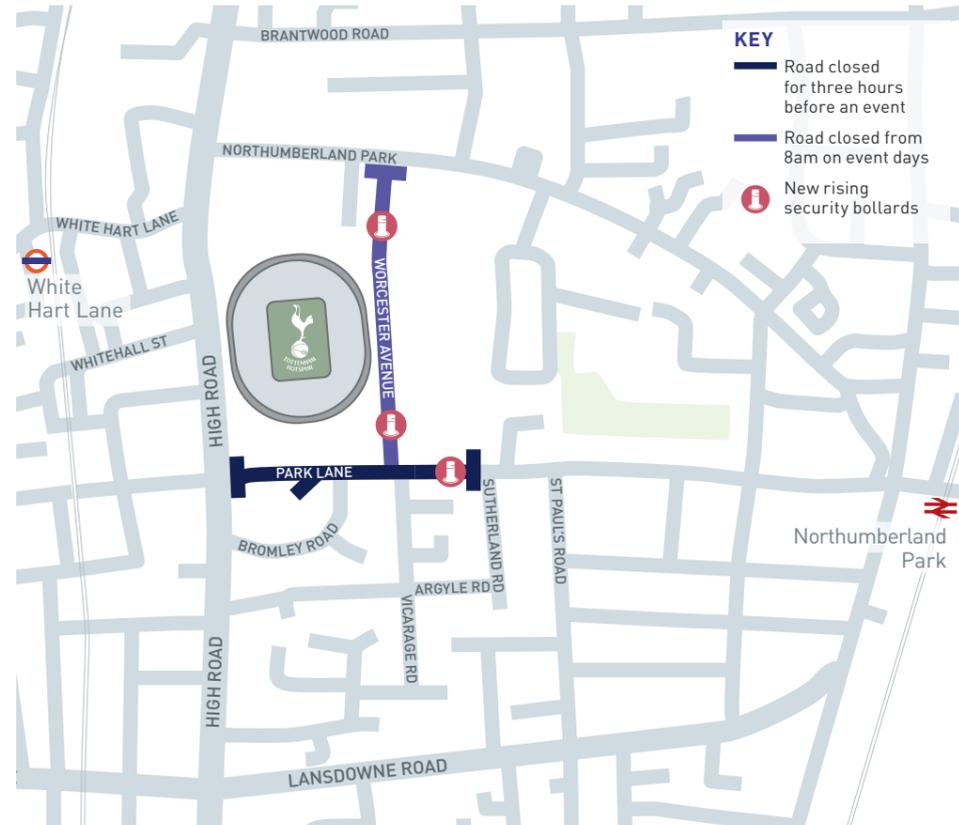
Worcester Avenue will also be closed from 8am on event days and Park Lane for three hours before an event. Parking bays will be suspended on both Park Lane and Worcester Avenue during these times.

If access to your home or business is directly affected by the road closure and you have either a Controlled Parking Zone (CPZ), Homes for Haringey (HfH) or Blue Badge parking permit, traffic marshals will allow you to pass at vehicle permit check points. Details of how to apply for a CPZ, HfH or Blue Badge can be found on page 12. Pedestrians will be able to walk along local roads at all times.

The next five maps show each phase of the road closures and how they might affect you. Similar measures will be in place for any event with a capacity of 10,000 or over. Details for NFL events will be communicated separately nearer to the first event.

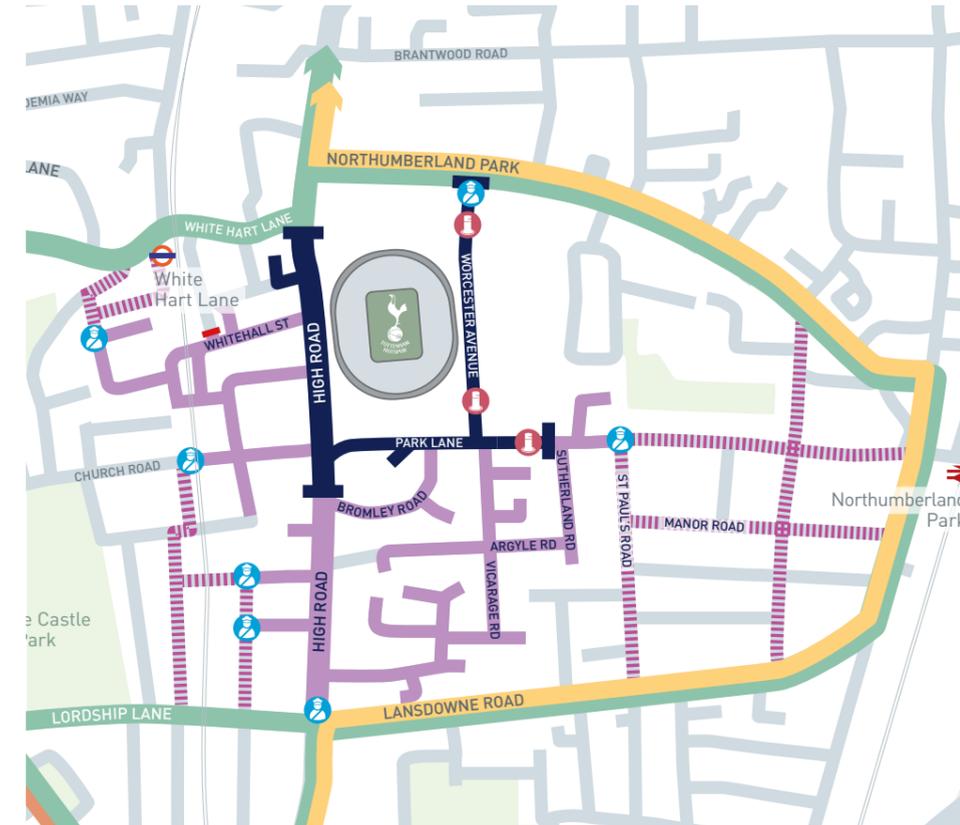
## SECURITY BOLLARDS

As part of the planning permission and to aid security checks around the stadium, three sets of vehicle rising-bollards are to be installed on Worcester Avenue (2) and Park Lane (1). These will only be operational on event days and will be manned by Club traffic marshals. The operation of these bollards has been discussed with the London Borough of Haringey and will be aligned with the road closures in place on event days.



### PRE-EVENT OR MATCH

From 8am on event days, Worcester Avenue will close. This is to allow early security checks of staff and vehicles going into the stadium's basement car park. Park Lane will also be closed three hours before an event and all parking bays on Worcester Avenue and Park Lane will be suspended during event days.



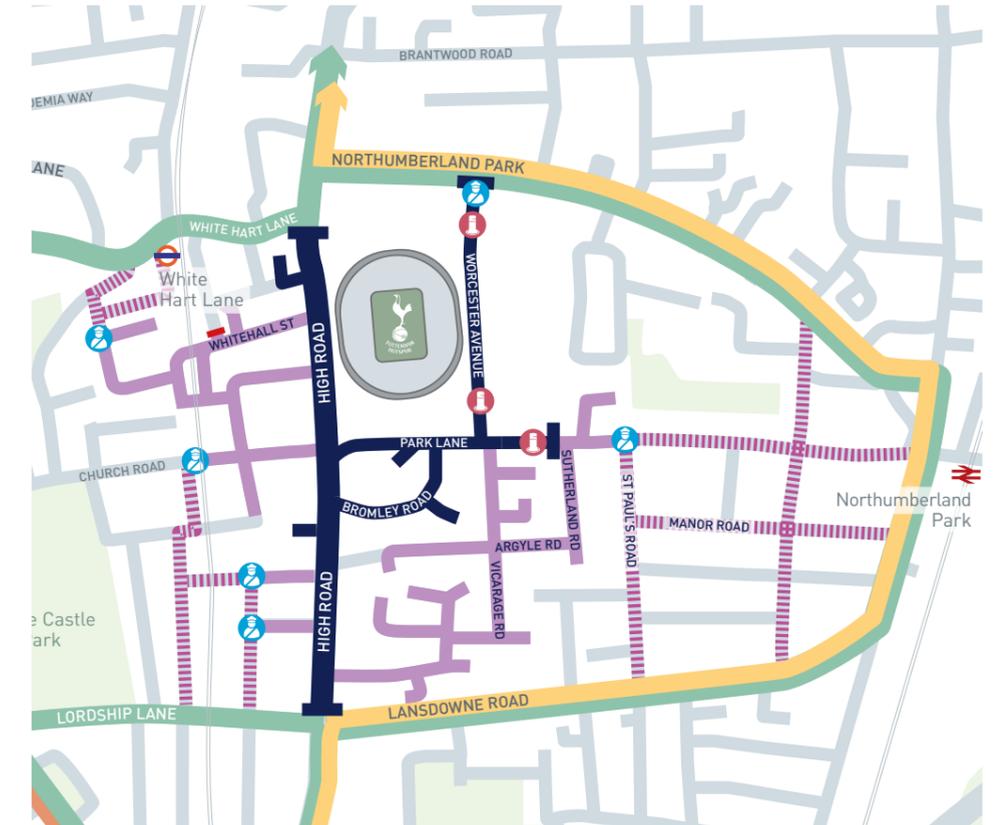
### PHASE 1: TWO HOURS TO ONE HOUR BEFORE AN EVENT OR MATCH

Two hours before any match or event, traffic marshals will close the northern section of the High Road from White Hart Lane to Bromley Road. General traffic and TfL buses will be on diversion to the east and west of the stadium.

Residents and businesses who want vehicular access to their properties will need to enter via a vehicle permit check point (see map above). Access will be permitted using their CPZ, Homes for Haringey or Blue Badge parking permit.

## KEY

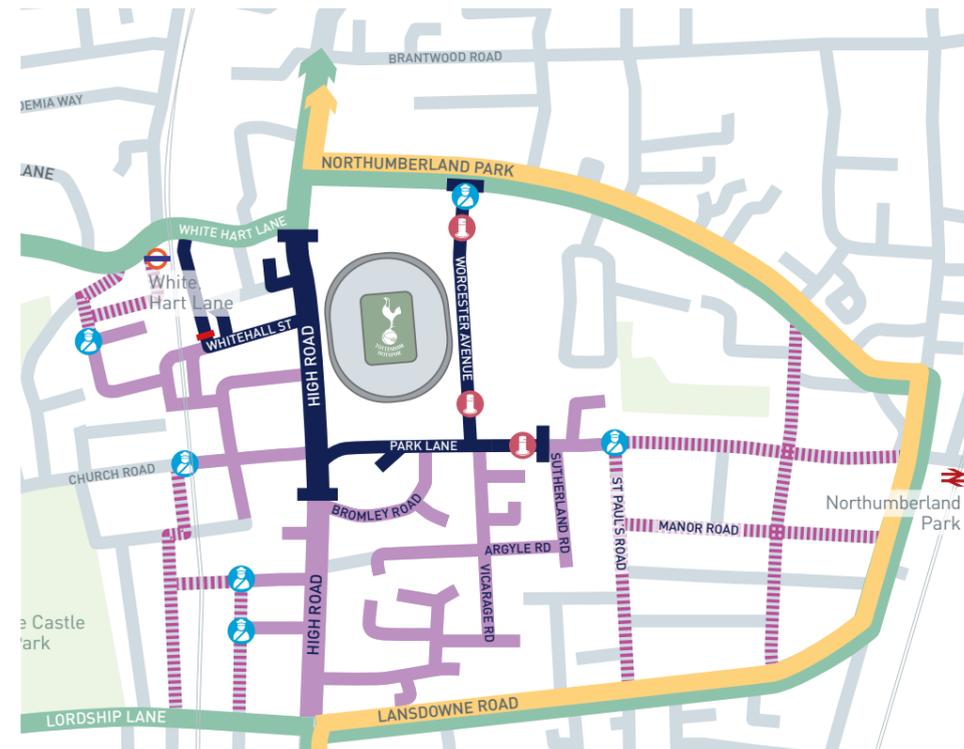
- Road closed
- Resident and business access permit zone
- Resident and business access route
- Vehicle permit check point
- New rising security bollards
- New eastern bus diversion route
- Local traffic diversion route
- Existing west bus diversion route
- Firegate



### PHASE 2: ONE HOUR PRIOR TO THE START OF AN EVENT OR MATCH AND UP TO 15 MINUTES AFTER

During this period, no vehicles (except emergency services) are permitted in the roads that are highlighted in navy blue on the map above. This is to ensure safety and security is maintained around the stadium. Residents and businesses displaying a valid CPZ, Homes for Haringey or Blue Badge permit will be able to drive through the check points into the roads highlighted purple. Traffic marshals will close the remaining southern section of the High Road to Lordship Lane/Lansdowne Road.

# ...WHICH LOCAL ROADS WILL BE CLOSED?



**PHASE 3: DURING AN EVENT OR MATCH**  
 Once an event or match has started, the southern section of the High Road will open for local resident and business access. The northern section (highlighted in navy blue) will remain closed to allow for the safe evacuation of the stadium in an emergency.

Worcester Avenue and Park Lane remain closed to all traffic.



**PHASE 4: 15 MINUTES PRIOR TO FINAL WHISTLE AND UP TO ONE HOUR POST-EVENT OR MATCH**  
 The roads surrounding the stadium are at their busiest after an event. Around 15 minutes before the end of an event, the Club traffic marshals will close the High Road from White Hart Lane to Lordship Lane/Lansdowne Road to all traffic. Worcester Avenue and Park Lane will remain closed to allow people to leave the stadium and make their way home. These roads will be closed for up to an hour but the MPS Match Commander may reopen them more quickly. On event days, Love Lane and Whitehall Street will have all parking bays suspended and will be closed for up to one and a half hours after an event to cater for queues at White Hart Lane station. For one to two hours after an event, Leaside Road will be one-way eastbound and Willoughby Lane will be one-way northbound to facilitate leaving the stadium efficiently.

# STRATEGIC TRAFFIC DIVERSION

On event days, a new strategic traffic diversion will be in place to enable traffic to avoid passing through the local area, helping to ease any local congestion (see map adjacent).

Freight and delivery vehicles travelling through the area will find it quicker to follow these routes and avoid the roads closest to the stadium on event days.

**ADVANCED WARNING**  
 Around 40 new advanced warning signs will be installed from Seven Sisters to the North Circular to raise awareness of event days.



# HOW WILL THE EVENT DAY CPZ WORK?



Managing car use and minimising congestion in the local area is one of our key objectives. The stadium is a public transport destination and one of our messages to supporters is that they should not drive to the stadium. Over the years we have been successful in significantly reducing the number of people driving to events through fan communication, enhanced public transport information and the introduction of the event day Controlled Parking Zones (CPZ) and we shall continue to work hard on this.

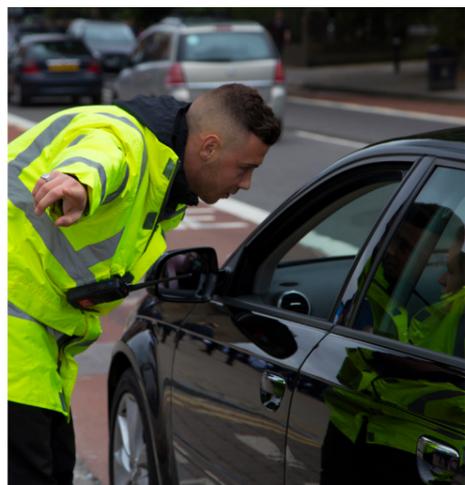
Following consultation with local residents, the existing event day CPZ has been extended by London Boroughs of Haringey and Enfield. It will be in force for the first event and will cover a larger area than before, helping to ensure residents can park as long as they have a valid CPZ, HfH or Blue Badge permit. A map is included on the next page.

If you do not have a valid CPZ, HfH or Blue Badge permit, or now live in a property included in the event day CPZ and park on-street, you will need to apply for one. You can do so using the details below:

**LONDON BOROUGH OF HARINGEY**  
[www.haringey.gov.uk/parking-roads-and-travel/parking/parking-permits](http://www.haringey.gov.uk/parking-roads-and-travel/parking/parking-permits)

**HOMES FOR HARINGEY**  
[www.homesforharingey.org/parking](http://www.homesforharingey.org/parking)

**LONDON BOROUGH OF ENFIELD**  
<https://new.enfield.gov.uk/services/parking/parking-permits>



## OFF-STREET PARKING

If you have off-street parking, live on a road affected by closures and do not require a permit, or you are a Blue Badge holder, you will need to show stewards or marshals at road closure vehicle permit check points a valid proof of address.

For example, this could be your driver's licence or a utility bill. You will then be permitted access. Visitors will be able to park using a visitor parking voucher but they will need to travel **before** the road closures come into effect.

As before, a small number of resident parking bays in very close proximity to the stadium will be suspended to ensure pedestrian safety. These suspensions will last all day so please check before you park. Advanced notices will be put in place seven days before each event to inform you when suspensions are in effect.

If you leave your car parked in these suspended spaces, it will be relocated to a neighbouring street.

You will need to contact Trace (Towed Vehicle Tracing services) on 0845 206 8602 or <https://trace.london> for information.

## OPERATIONAL HOURS OF THE EVENT DAY PARKING ZONES

### LONDON BOROUGH OF ENFIELD

**South Edmonton Event Day**  
 12 noon to 9pm

**North Middlesex Hospital**  
 Monday to Sunday  
 9am to 8.30pm

### LONDON BOROUGH OF HARINGEY

**Tottenham North**  
 Monday to Saturday  
 8am to 8.30pm  
 Sunday and Public Holidays  
 12 noon to 8pm

**Tottenham Event Day**  
 Monday to Friday  
 5pm to 8.30pm  
 Saturday, Sunday and Public Holidays  
 12 noon to 8pm

**White Hart Lane**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm

**Tottenham Hale North Event Day**  
 Monday to Friday  
 5pm to 8.30pm  
 Saturday, Sunday and Public Holidays  
 12 noon to 8pm

**Bruce Grove North**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm

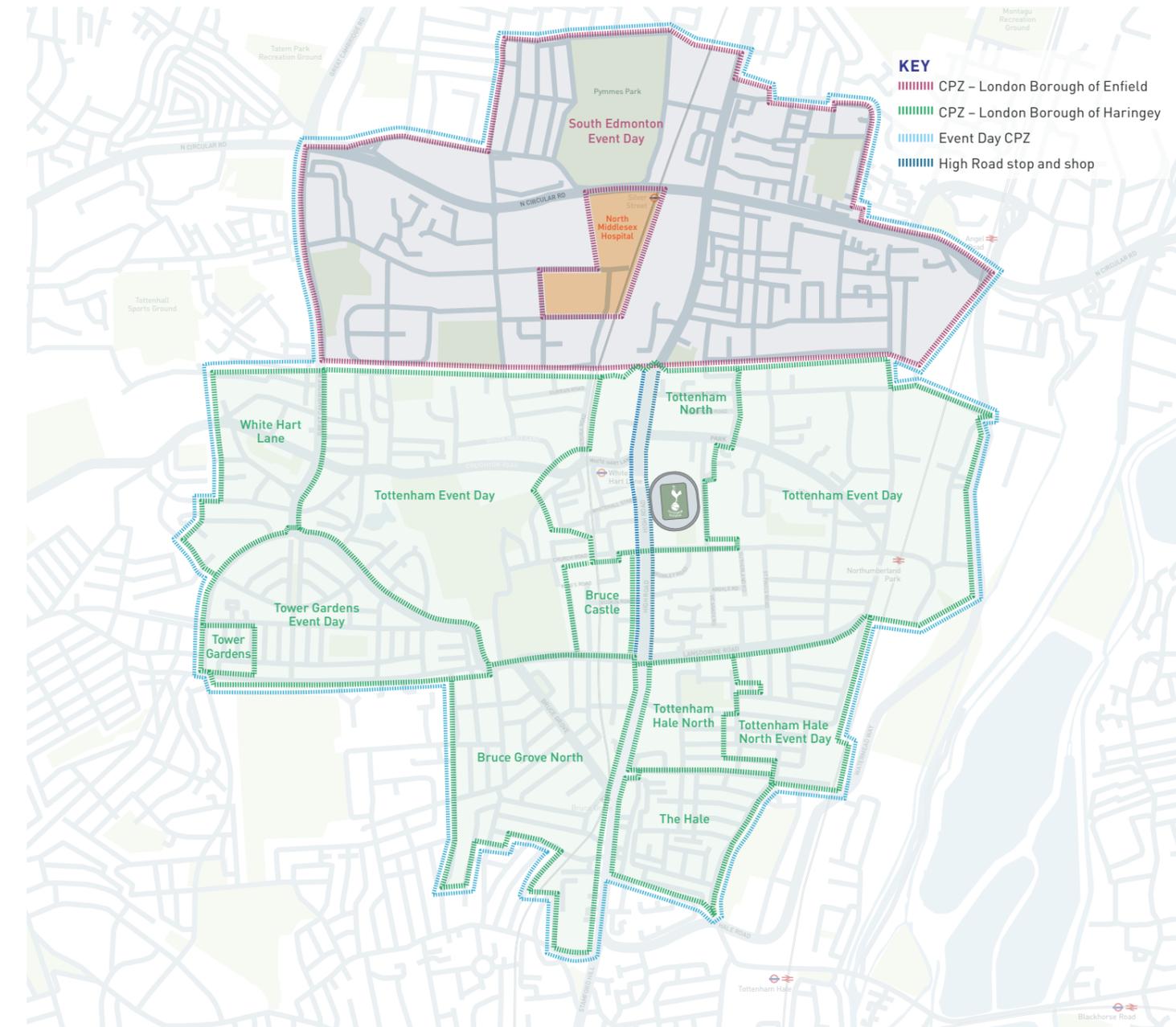
**Bruce Castle**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm

**Tower Gardens**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm

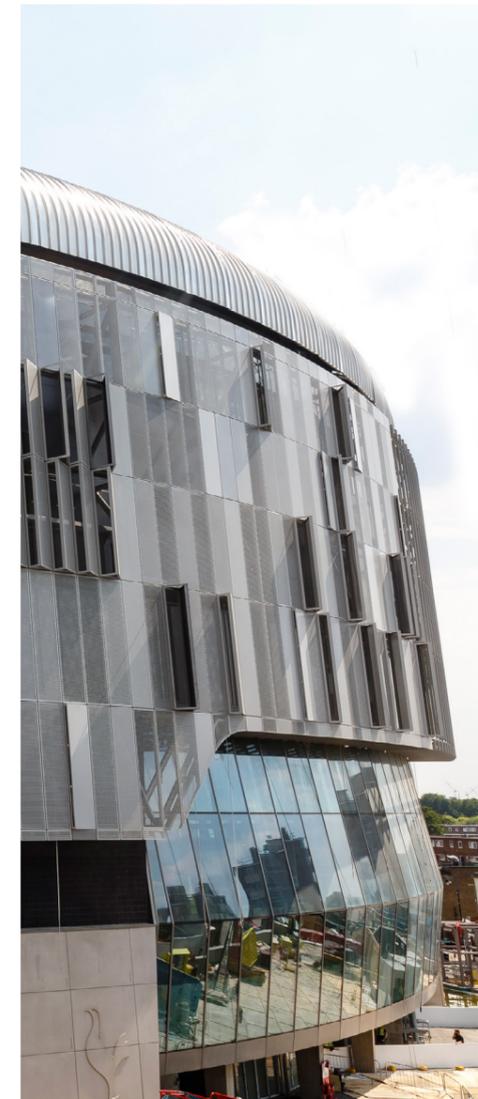
**Tower Gardens Event Day**  
 Monday to Friday  
 5pm to 8.30pm  
 Saturday, Sunday and Public Holidays  
 12 noon to 8pm

**Tottenham Hale North**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm

**The Hale**  
 Monday to Friday  
 8am to 8.30pm  
 Saturday and Sunday  
 8am to 8pm  
 Public Holidays  
 12 noon to 8pm



## CPZ AND ROAD CLOSURE FAQs



Here is a list of frequently asked questions about the event day Controlled Parking Zone (CPZ) and road closures which you may find helpful.

### Q. Why are you closing local roads for longer?

A. The increased numbers of people visiting the stadium and updated safety and security requirements mean we shall need to close the roads closest to us to general traffic for longer. This allows pedestrians and local communities to travel around the stadium safely on event days and means we can evacuate the ground quickly in the event of an emergency.

### Q. I can't drive to my home if the High Road is closed. Do I need to apply for a new CPZ permit?

A. We know there are a number of properties that will have their access affected by this necessary road closure. All you will need to do is display your existing CPZ or Homes for Haringey (HfH) parking permit and traffic marshals will let you pass. If you have off-street parking, and do not need a permit, or you are a Blue Badge holder, you can show stewards or marshals at road closure points a valid proof of address, which could be a driver's licence or utility bill, and they will give you access.

### Q. I need a new CPZ permit or Homes for Haringey parking permit. How do I get one?

A. You can apply for a permit using the details below:

**London Borough of Haringey:**  
[www.haringey.gov.uk/parking-roads-and-travel/parking/parking-permits](http://www.haringey.gov.uk/parking-roads-and-travel/parking/parking-permits)

**Homes for Haringey:**  
[www.homesforharingey.org/parking](http://www.homesforharingey.org/parking)

**London Borough of Enfield:**  
<https://new.enfield.gov.uk/services/parking/parking-permits>

### Q. What happens if friends want to visit?

A. Visitors will need to arrive and park before road closures come into effect. If they do so, they will be able to park using a visitor parking voucher which can be applied for via your relevant local authority's website.

### Q. When does the new scheme start?

A. The new road closures and CPZ will be operational for the first major event (10,000 spectators or more) in order for the Club and the local authorities to identify and resolve any issues. The Club will communicate this event and we strongly recommend you to register for updates via [tottenhamhotspur.com/local](http://tottenhamhotspur.com/local).

### Q. What happens if I have an incident at my home and I need emergency help?

A. Emergency access will be maintained at all times.

### Q. How will I know when events are being held?

A. We shall advertise our match days or any other events via our website, social media, at CPZ entry points and through advanced warning signs. During the season, Premier League or other fixtures can often change due to broadcasting requirements but we shall always do our best to ensure our supporters and neighbours are aware. You can register for updates via [tottenhamhotspur.com/local](http://tottenhamhotspur.com/local).

### Q. Will these arrangements change for the NFL or other events?

A. The principles of the arrangements detailed in this information booklet are the same for all event days. Some changes may be required for the NFL – for example due to increased security, to facilitate the Fan Zone or Tailgate party. These will always be communicated with the local community and local authorities well in advance.

### Q. I am a local business owner on the High Road. How will I get access?

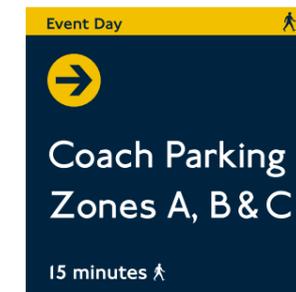
A. If you are a business owner and have a valid CPZ permit, you will be able to park on one of the side roads. Pedestrian access to your business will be maintained at all times.

### Q. What if I have a delivery coming on an event day?

A. We would recommend you arrange delivery outside of the road closure hours or on non-event days if possible. Delivery drivers will not be able to pass vehicle check points once the road closures are in effect.

## WHERE WILL COACHES PARK?

Coach travel is an important part of our transport strategy for getting supporters to and from the area whilst minimising the number of private cars on local roads. For the new stadium, the Club will improve how it operates and runs coaches.



We shall now manage five coach parking 'zones', all of which will be a 10 minute walk or less from the stadium (see map below):

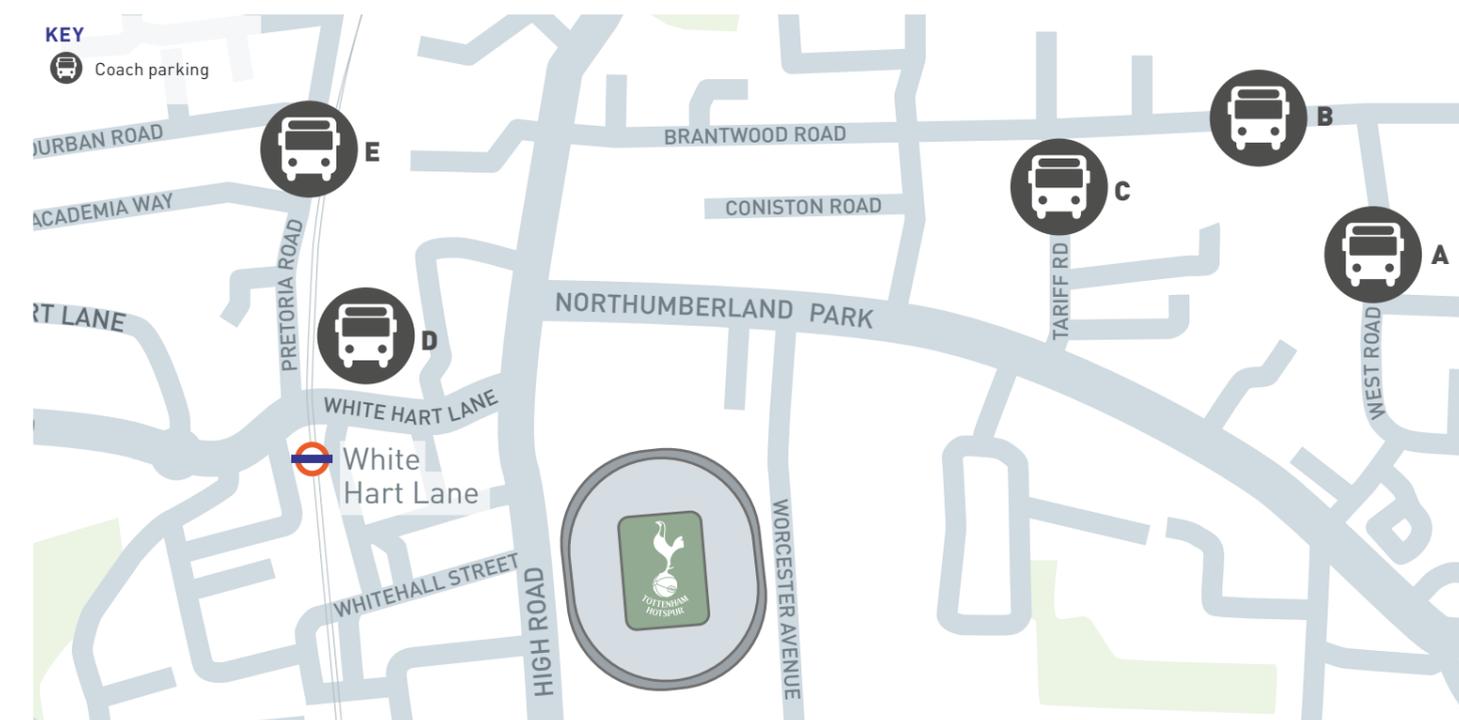
- 'Zone A' – West Road (9 spaces)
- 'Zone B' – Brantwood Road (19 spaces)
- 'Zone C' – Tariff Road (10 spaces)
- 'Zone D' – The Goods Yard (31 spaces – all off street)
- 'Zone E' – Pretoria Road (22 spaces)

In total, we shall have space for 60 coaches on-street and 31 off-street at the Goods Yard, 44-52 White Hart Lane.

For the on-street coach parking zones (A, B, C and E) we shall need to suspend some parking bays for event days. These will be communicated with signs seven days before an event and carefully operated by Club marshals. Coach drivers will be reminded to turn off their engines when they are parked.

We shall be monitoring coach travel carefully during the first season. Zone E will likely only be used when over 40 coaches are expected. Zone D is also a temporary location for the first season and is subject to change.

Supporter coaches will arrive between three hours and two hours before the start of an event and will normally have left within one hour after an event.





## WILL TRAIN AND TUBE SERVICES BE AFFECTED?

Our supporters are used to travelling to and from the stadium using four local stations (White Hart Lane, Seven Sisters, Northumberland Park and Tottenham Hale). These stations will continue to be the main hub stations for the new stadium, with a fifth, Meridian Water, available from summer 2019.

The Victoria line has recently received upgrades to increase the service frequency. The line will be busy on event days, particularly before a weeknight event, when commuters are also making their way home. During these peak times, to manage congestion and safety, some trains may not stop at Seven Sisters and will continue straight to Tottenham Hale. Please listen to station announcements for destination information. Your journey may be less crowded if you can avoid the Victoria line during busy periods.

After events at the stadium, there will be managed queues at Seven Sisters and Tottenham Hale stations.

However, supporters will be strongly discouraged from using Silver Street station and Bruce Grove station. At Bruce Grove you will find it extremely difficult to board a train immediately after a match if you are travelling southbound. We would recommend you check event times before you travel.

As previously mentioned, we expect a period of 'bedding-in' for residents and supporters and that the experience will change and improve after the first few events as everyone gets used to the new travel options and arrangements. Congestion will also ease once the remaining station improvement works, currently being undertaken by TfL and others, have been completed.

### THE IMPROVEMENT WORKS BEING DELIVERED INCLUDE:

- **At Tottenham Hale station** – the creation of a new combined station entrance to be completed during 2019.
- **At White Hart Lane station** – additional stairs and lift access due for completion during summer 2019 along with the introduction of a fleet of new high capacity, air conditioned trains from spring 2019. There will also be an enhanced event day timetable.
- **At Northumberland Park station** – improved accessibility due for completion during autumn 2018 and increased service frequencies from summer 2019 as part of the three-tracking project between Stratford and the new Meridian Water station.

## HOW WILL STATIONS OPERATE?

Before and after events at Tottenham Hotspur Stadium, TfL, Greater Anglia and the Club will implement specific event day operation plans for Seven Sisters, Tottenham Hale, Northumberland Park and White Hart Lane stations. Temporary barriers will be erected outside stations near the end of an event to manage queues and, in some cases, restrict access.

More marshals and staff from the Club, TfL and Greater Anglia will be on hand than previously and new signage will guide people quickly from stations to the stadium. As with the old stadium, it is the post-event period where queues will be longest at the four local stations.

Queue lengths will reduce after the first few games as supporters learn their best travel route, station works are completed and new rolling stock comes into operation.

Midweek events will mean that the Victoria line is especially busy, as supporters travel with commuters to Tottenham.

We recommend that you check before you travel and avoid the busy periods before and after events. Please visit [tfl.gov.uk/plan-a-journey](http://tfl.gov.uk/plan-a-journey) for more information.



	Northumberland Park	Seven Sisters	Tottenham Hale	White Hart Lane
Step-free?	Fully step-free by autumn 2018.	Not step-free.	There is step-free access to the Victoria line and the northbound Greater Anglia platform. Southbound Greater Anglia is not step-free.	Step-free after station works are completed during summer 2019.
Post-event measures	Park Lane will be extremely busy after an event. Signage will direct supporters to a different side of the road depending on whether they are travelling northbound or southbound. The queue itself will be managed outside the Spurs Shop, adjacent to the station, with barriers also placed to the north if needed. Facilities to buy tickets and top-up Oyster cards will be very limited. Please purchase tickets or top-up cards before arriving.	After an event, queuing starts on the west side of the High Road (near Pelham Road) and works south along the High Road to Seven Sisters station. To disperse the crowds as quickly as possible, there will be changes to how the station entrances and exits operate. Please look for signs and follow directions from marshals and TfL staff. Queues after an event will suspend a small stretch of Cycle Superhighway 1.	We are not anticipating a queue at this station, but a queue management plan will be in place for one to form at the station if needed. Facilities to buy tickets and top-up Oyster cards will be very limited. Please purchase tickets or top-up cards before arriving.	Queues will run down Love Lane and into Whitehall Street, meaning these roads will be closed from one hour before the end of an event to one and a half hours after an event for safety reasons. Currently limited queuing is predicted for those travelling northbound.

# WHAT ABOUT TFL BUSES?

The stadium is well-served by TfL buses. They are an important, accessible mode of transport, so we are keen to ensure services run as smoothly as possible and operate in the area for as long as possible.

When the High Road closes to buses on event days from two hours before the start time, during and up to one hour after the event finishes, it will be necessary to run some bus diversions.

## NEW EAST DIVERSION

The 349 will follow a new, much shorter diversion east, along Lansdowne Road, Shelbourne Road and Northumberland Park before rejoining the High Road adjacent to Sainsbury's.

## WHY THE NEW EAST BUS DIVERSION ROUTE?

Before and after an event, a new bus diversion scheme was an obligation of the council as part of the planning permission for the stadium.

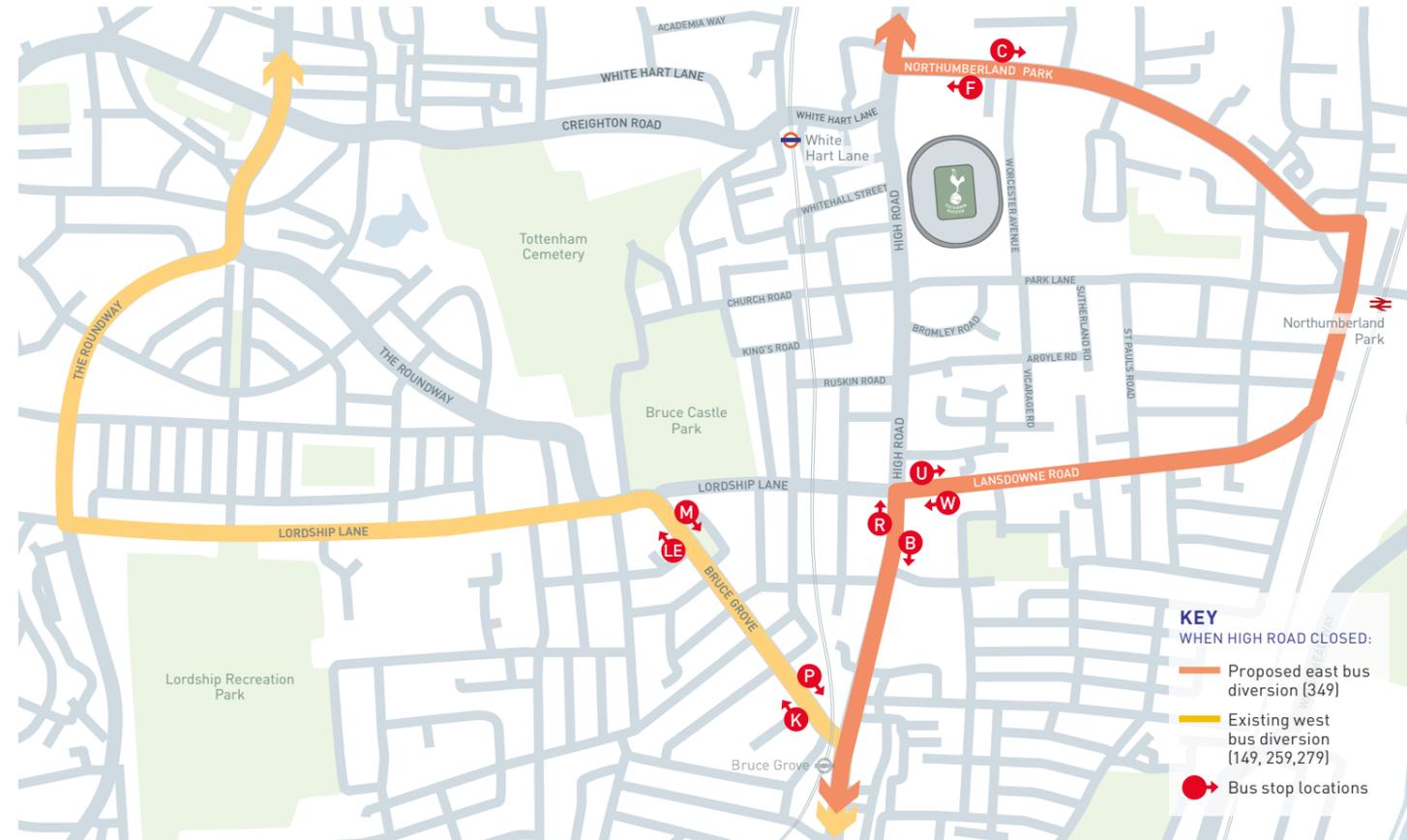
The east bus diversion will be much shorter and throughout the 'bedding-in' period the Club, TfL and London Borough of Haringey will be looking to switch more services from the west diversion to the east diversion.

## WEST DIVERSION

As with the old stadium, the 149, 259 and 279 will initially divert west along the A10, onto Lordship Lane and The Roundway, before eventually rejoining the A10 northbound to the North Circular. TfL will install notices in bus stops to advise when any services

or bus stops are suspended. Working in partnership with TfL, the Club and London Borough of Haringey will be reviewing the bus operations throughout the 'bedding-in' period with the aim of increasing the number of services on the east diversion.

We shall also be investigating whether buses can remain on the High Road during phase one of the road closures. Further information is available at TfL's website: <https://tfl.gov.uk/modes/buses/>.



# WHERE ARE THE NEW SUPPORTER SHUTTLE BUS ROUTES?

For the first time, the Club is providing new pre-booked, free shuttle bus services for supporters. This will cater for approximately 2,300 – 3,300 people per route (depending on demand) and we shall run three services, from Alexandra Palace, Wood Green and Tottenham Hale stations.

Alexandra Palace and Wood Green shuttle buses are fully accessible for wheelchair users and will be in operation for three hours before and two hours after an event. The shuttle buses will help to ease the impact on the local rail stations and the need for supporters to change at Finsbury Park Station.

The shuttle bus stops will be carefully managed by the Club and First Travel Solutions. Queues will be supervised by marshals and temporary portaloos will be provided if needed. Supporters will need to show their ticket and pre-book via the Club for this service.

## ALEXANDRA PALACE

Before an event, shuttle buses will pick-up from outside Avenue Gardens and drop-off outside Haringey Sixth Form College. This journey will then be reversed after an event. Some parking spaces around Station Road and Bedford Road (Alexandra Palace) and on White Hart Lane outside the Haringey Sixth Form College will need to be suspended on event days for the shuttle buses to operate. These suspensions will be advertised at least seven days before.



## WOOD GREEN

Before an event, shuttle buses travelling from Wood Green will pick up opposite the bus station from the existing rail replacement stop just 60m from the station, and also drop off at White Hart Lane, outside the Haringey Sixth Form College. At Wood Green, we shall also have a waiting area for shuttle buses on White Hart Lane opposite Crescent Gardens. After an event, the buses will drop supporters outside the Green Rooms Hotel.

## TOTTENHAM HALE

We shall also be operating a shuttle bus from Tottenham Hale station for premium customers. Before an event, this will pick up from TfL's bus stop F (on Watermead Way, near the taxi rank) and drop off by the Duke's Aldridge Academy. This journey will then be reversed after an event. This new service is offered to provide more travel choices and encourage premium guests not to drive.

If you leave your car parked in suspended parking bays, it will be relocated to a neighbouring street. You will need to contact Trace (Towed Vehicle Tracing services) on 0845 206 8602 or <https://trace.london> for information.

# HOW WILL LOCAL BUSINESSES BE AFFECTED?



The new stadium will provide a major economic boost to local businesses. Around 62,000 supporters will visit for events and both the stadium and the Tottenham Experience will attract visitors 365 days a year.

On event days, businesses will need to comply with the same road closures and restrictions as residents (see page 8). If you are on the High Road, you will need to arrange your deliveries for outside of event day hours.

Road closures immediately before and after an event will effectively pedestrianise the High Road and other local roads, and supporters will be encouraged to arrive in the area earlier and to stay longer.

Beyond matchdays, the NFL games, concerts and other events will bring new visitors to the local area – many of whom will not have been to Tottenham before. Completion of the Tottenham Experience, which will include a new museum, along with the stadium roof/skywalk, hotel and extreme sports hub will also create a range of offers to attract visitors to the area, bringing new investment into Tottenham and supporting local businesses.

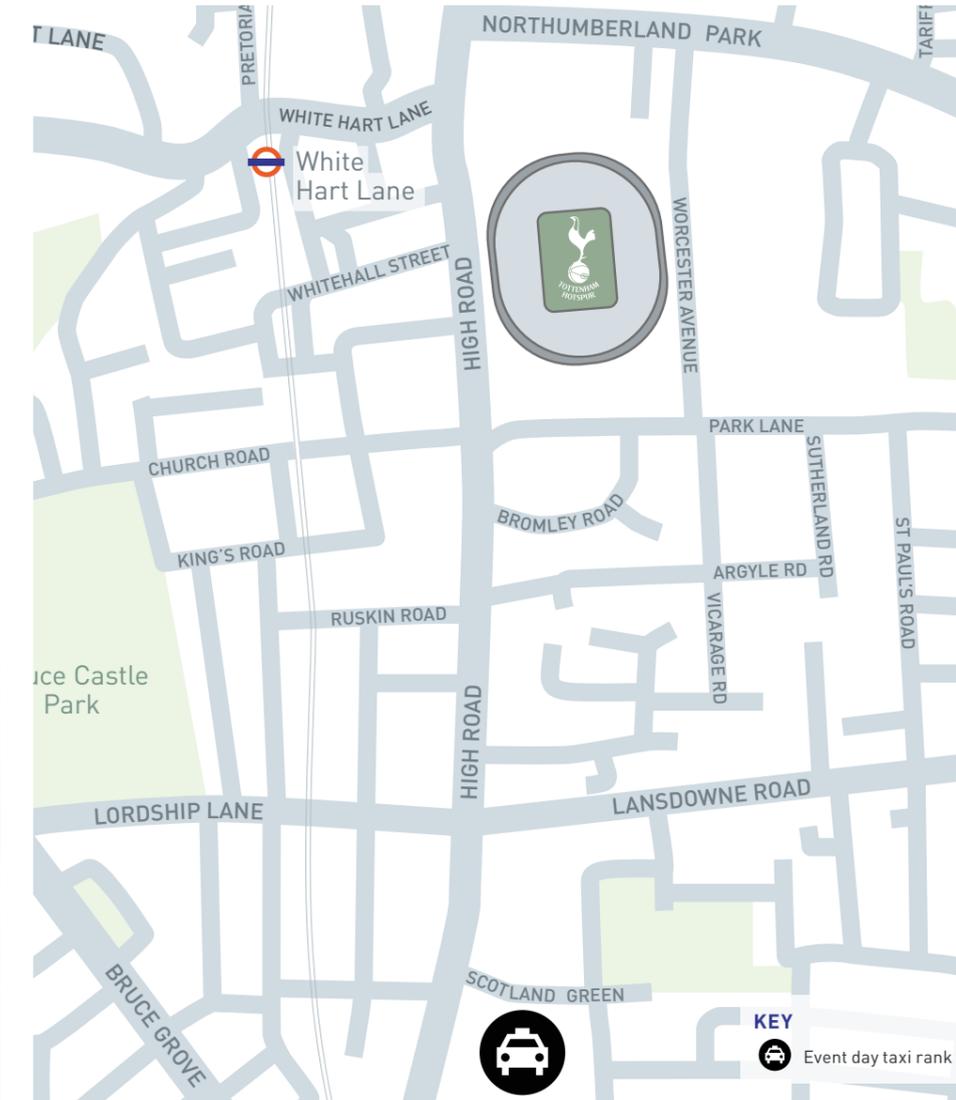
This means more people spending money at local cafés, shops, traders and pubs. It will also help to manage the flow of people in and out of the stadium and ease queues at local stations.

# WHAT ABOUT BLACK TAXIS?

The Club is keen to support local black taxi drivers and has been working closely with London Borough of Haringey and TfL to understand how we might better use them as another travel option for supporters on event days.

We have secured a new, temporary, event day black taxi rank at Scotland Green, which will operate during event day hours. This will be on a side street, off the High Road and marshalled by the Club and can also be used for those with accessibility needs. It will provide another mode of transport for people travelling to and from the stadium.

**If you leave your car parked in these suspended spaces, it will be relocated to a neighbouring street. You will need to contact Trace (Towed Vehicle Tracing services) on 0845 206 8602 or <https://trace.london> for information.**



# WHERE ARE THE MAIN WALKING ROUTES TO THE STADIUM?

The majority of supporters will be using public transport to get to and from the stadium and will be encouraged to follow the designated walking routes from local stations and bus stops – shown in blue on the map to the right.

These routes will be especially busy three hours before and up to one and a half hours after an event.

Walking routes will be promoted through new pedestrian signs, such as those below, paid for by the Club and located on-street.

<p>Event Day</p> <p>Northumberland Park Station</p> <p>15 minutes</p>	<p>Event Day</p> <p>Tottenham Hale Station</p> <p>15 minutes</p>
<p>Event Day</p> <p>Seven Sisters Station</p> <p>15 minutes</p>	<p>Event Day</p> <p>White Hart Lane Station Northbound</p> <p>15 minutes</p>

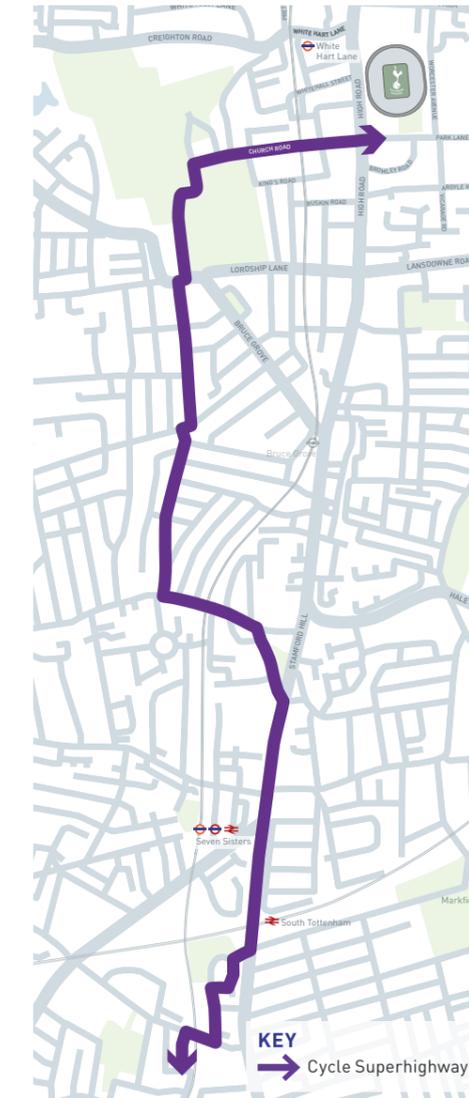


# WHERE ARE THE MAIN CYCLE ROUTES TO THE STADIUM?

Cycling is growing across London and the Club is hoping to increase the number of supporters and staff who cycle to events. Ultimately, we would like at least 1% of all supporters (around 620 people) to cycle to and from events.

The infrastructure is being provided to support this, with Cycle Superhighway 1 already running to the stadium from the south and a mini-Holland route in Enfield under construction that will create a link to the stadium from the north.

With this in mind, approximately 250 new cycle stands will be installed near to the stadium. They will be located on-street, away from the stadium for security reasons so that residents and people working in the area can also use them on non-event days.



# DELIVERING FOR THE LOCAL COMMUNITY

The Club is proud to be part of Tottenham's vibrant community and the new stadium development continues to be a catalyst for positive change and regeneration in North Tottenham, creating a new sports, leisure and entertainment destination for London.

It will become a hive of activity 365 days a year, with a new museum, an innovative Skywalk, 21st century retail experiences, first-class conference and banqueting and high quality leisure facilities including restaurants and a hotel – and will attract in excess of two million visitors per year.

A minimum of two NFL matches at the stadium every year, as well as other events including concerts, will bring a new audience to the local area, showcasing Tottenham and bringing further economic and social benefits to the area with truly global coverage and attraction.

As part of the wider scheme, the Club has to date already delivered:

- The London Academy of Excellence Tottenham – a new state-funded Sixth Form, financially supported by the Club and delivered in partnership with Highgate School, bringing expertise and first-class teaching from eight top independent schools, giving the area's brightest students the best possible access to leading Universities.

- A new 78,000 square foot Sainsbury's store at Northumberland Park – employing 280 people from the local area.
- The Cannon Road Development - 100% affordable, 222 new homes and the new Brook House Primary School on the site of an old rubber factory.
- Berland Court – An affordable housing development near Northumberland Park rail station, incorporating the relocation of a Jehovah's Witness Kingdom Hall and a new Club merchandise store.

Furthermore, the Club has created 1,458 new jobs for local people as a direct result of its ongoing new stadium development scheme and sport-led regeneration of the area. Jobs have been delivered across a range of industries, including retail, education, construction, hospitality, IT and security, with many going to local people.

Once complete, the stadium development scheme will have created 3,500 new jobs and pump £293 million into the local economy each year – almost double the impact of our previous stadium.

## THE TOTTENHAM HOTSPUR FOUNDATION

The Tottenham Hotspur Foundation has a long established, productive and valued partnership with its local communities where there are significant socio-economic challenges alongside aspirations, potential, talent and opportunity to create, deliver and sustain positive change.

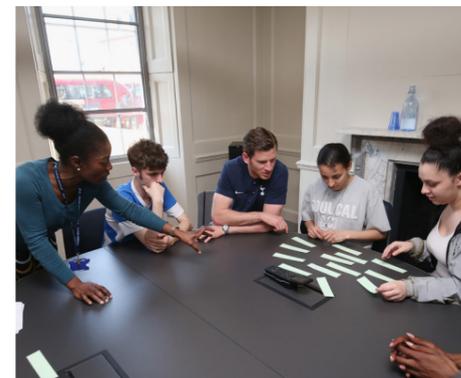
The work of The Foundation and its supporters directly touches the lives of people across North London every day, providing education and employment pathways to create life-changing opportunities for children, groups and individuals within our communities.

The Foundation delivers innovative programmes with the aim of:

- Improving achievement.
- Building community cohesion.
- Promoting healthy lifestyles.
- Supporting people with disabilities.

The development of the stadium is allowing the Foundation to significantly expand its work and impact and they have already moved into new offices within the restored Percy House, giving the Foundation a presence on the High Road for the first time.

Percy House is now a major community enterprise, employment and skills hub located at the heart of North Tottenham and the Foundation will deliver 95,000 hours of community and sports programmes to those living in the Club's local area.



For anyone interested in a role at Tottenham Hotspur's new stadium, as a steward, in a food and drink role, or as a Fanbassador, please contact the Tottenham Hotspur Foundation. Email us at [thf.recruitment@tottenhamhotspur.com](mailto:thf.recruitment@tottenhamhotspur.com) or ring us on 0208 365 5138 to arrange a screening session, so we can help you to find the perfect role at the new stadium.

# BRINGING THE NFL TO TOTTENHAM

The new stadium has been designed from the outset to host the NFL, including a structurally engineered fully retractable pitch – the first for any stadium in the UK.

We shall be hosting our first NFL game on 14 October 2018 and are delighted to be welcoming the Oakland Raiders and Seattle Seahawks to Tottenham.

The event day measures set out in this booklet will principally be the same for NFL games, although some changes may be required to accommodate the longer nature of the games. A key feature of the NFL is the Tailgate, which takes place at selected venues close to the stadium. Local residents will be able to enjoy these vibrant activities and they will bring an added economic boost to the area.

We shall of course communicate any changes to the stadium's operation to the community and local authority ahead of NFL matches. To register for updates, please visit [tottenhamhotspur.com/local](http://tottenhamhotspur.com/local).

To get up-to-date information and details of any other events and concerts, please visit [tottenhamhotspur.com/matches](http://tottenhamhotspur.com/matches).



# WHO CAN I CONTACT AND HOW DO I FIND OUT MORE?

## REPORT INCIDENT

To report a crime or incident on event days please use one of the following telephone numbers: **101** for non-emergencies; **0800 555 111** for Crimestoppers and **999** for an immediate risk.

### STREET RUBBISH

To report litter or uncollected rubbish:

#### LB Haringey

**Visit** [www.haringey.gov.uk](http://www.haringey.gov.uk) and search 'street rubbish'

**Call** 020 8885 7700

#### LB Enfield

**Visit** [www.enfield.gov.uk](http://www.enfield.gov.uk) and search 'street rubbish'

### NOISE

To report a noise complaint or issue:

#### LB Haringey

**Visit** [www.haringey.gov.uk](http://www.haringey.gov.uk) and search 'noise'

**Call** 020 8489 1335

#### LB Enfield

**Visit** [www.enfield.gov.uk](http://www.enfield.gov.uk) and search 'noise'

### PARKING

For CPZ's or to apply for a new permit:

#### LB Haringey

**Visit** [www.haringey.gov.uk](http://www.haringey.gov.uk) and search 'controlled parking zones'

**Call** 020 8489 2102 for parking enforcement; or 0330 008 7895 for the vehicle pound

#### LB Enfield

**Visit** [www.enfield.gov.uk](http://www.enfield.gov.uk) and search 'controlled parking zones'

### ANTI-SOCIAL BEHAVIOUR

To report any anti-social behaviour:

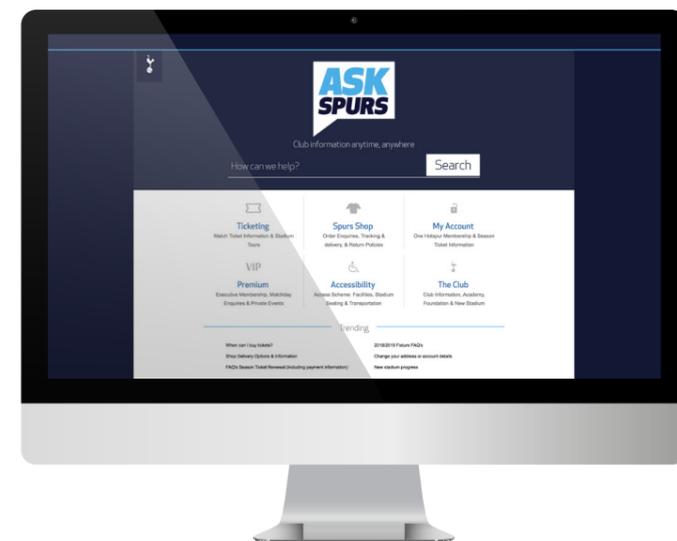
#### LB Haringey

**Visit** [www.haringey.gov.uk](http://www.haringey.gov.uk) and search 'anti-social behaviour'

**Call** 020 8489 1335

#### LB Enfield

**Visit** [www.enfield.gov.uk](http://www.enfield.gov.uk) and search 'anti-social behaviour'



Monitoring how the stadium runs and how people travel to and from it will also be an important task over the next three to five years.

We'll be constantly reviewing our travel arrangements and impact on the local area so that we can assess whether any changes need to be made. On our website we'll include updates about the stadium. If you have any comments or questions regarding the operation of the stadium or you also want to alert us to any of the issues above, you can:

-  Visit [tottenhamhotspur.com/ask-spurs](http://tottenhamhotspur.com/ask-spurs)
-  Feedback via [tottenhamhotspur.com/feedback](http://tottenhamhotspur.com/feedback)
-  Call **020 3946 4040**  Follow us on twitter [@SpursOfficial](https://twitter.com/SpursOfficial)
-  You can download a copy of this booklet and register for updates via [tottenhamhotspur.com/local](http://tottenhamhotspur.com/local)

### OTHER USEFUL CONTACTS

**Transport for London**  
[www.tfl.gov.uk](http://www.tfl.gov.uk)

**Homes for Haringey**  
[www.homesforharingey.org](http://www.homesforharingey.org)

**Metropolitan Police**  
[www.met.police.uk](http://www.met.police.uk)

**Greater Anglia**  
[www.greateranglia.co.uk](http://www.greateranglia.co.uk)

**British Transport Police**  
[www.btp.police.uk](http://www.btp.police.uk)  
0800 405 040

## TOTTENHAM HOTSPUR STADIUM 2019/20 SEASON – MAJOR EVENTS CALENDAR

The Tottenham Hotspur Stadium has been designed from the outset as a multi-purpose venue – attracting people to the area for major sporting and entertainment events throughout the year.

Due to the changeable nature of the Club's fixture list, with Major Events and match dates and times regularly changing as broadcast selections are made and cup fixtures confirmed, we strongly recommend that local residents regularly check the official [Stadium Events listing page](#), as a matter of routine.

*Tip – Why not save this link to your 'FAVOURITES' list on your computer or mobile phone, to ensure you always have this list to hand.*



# THANK YOU

If you would like a summary of this information in your own language, please email us at [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com).

## Albanian

Nëse doni një përmbledhje të këtij informacioni në gjuhën tuaj, ju lutemi na dërgoni një email në adresën [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com).

## Arabic

ناونعلا علج لىحى! انل لسرت نأ اجرفل اف مأل كتغلب تامولعملل هذه نع أنجوم تدرأ اذا  
يلااتلا يذورتلكلال [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com)

## French

Si vous souhaitez un résumé de ces informations dans votre langue, veuillez nous adresser un mail à [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com)

## Gujarati

જો તમને તમારી પોતાની ભાષામાં આ માહિતીનો (ઇન-ફ્રેન્ચ મેશન) ટૂંકસાર જોઈતો હોય તો,  
કૃપા કરી અમને ઈમેલ કરો [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com)

## Greek

Αν θέλετε να λάβετε μία περίληψη των πληροφοριών αυτών στη γλώσσα σας, παρακαλείσθε ενημερώστε μας μέσω email στην διεύθυνση [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com)

## Kurdish

ئەگەر پوختەپەکی ئەم زانیار یانەت بە زمانی خۆت دەوێت، تکایە ئیمەیلمان بۆ بکە بۆ:  
[communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com)

## Portuguese

Se desejar obter um resumo destas informações no seu idioma, envie um e-mail para [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com).

## Romanian

Dacă doriți un rezumat al acestor informații în limba dvs., vă rugăm să ne trimiteți un email la [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com).

## Somali

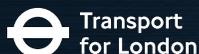
Haddii aad rabto in macluumaadkan laguugu soo koobo luqaddaada gaarka ah, fadlan iimayl noogu soo dir halkan [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com).

## Turkish

Bu bilgilerin kendi dilinizde özeti için lütfen [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com) adresinden bize e-posta gönderin.

This information is available in large print or audio format.

Please email us at [communityrelations@tottenhamhotspur.com](mailto:communityrelations@tottenhamhotspur.com) to request a copy.



## **Appendix G**

*Fixed Design Parameters for THFC Stadium/WHL Station Link (Populous and others, July 2019) and email to Haringey Council dated 19 July 2016*

Sunday, October 8, 2023 at 23:04:16 British Summer Time

**Subject:** Stadium/WHL Station Link  
**Date:** Tuesday, 19 July 2016 at 15:08:42 British Summer Time  
**From:** Richard Serra  
**To:** Sarah Lovell  
**CC:** Fisher Helen, Emma Williamson, Simon Ancliffe, Tim Spencer, Tom Jones  
**Priority:** High  
**Attachments:** C431A6AE-DECC-41E9-8D2A-F6E14B465AC6[6].png, 33ACB6DB-4412-4A83-9F46-3B13FAFC8962[5].png, F6E2C25E-5701-4BAB-B39E-62D704762DB3[5].png, Design Parameters Station-Stadium Link 1.1 July 2016.pdf

Dear Sarah

As promised I attach our proposed design guidelines for inclusion within the next round of HRW procurement documentation as fixed parameters.

We have rehearsed much of the content with you previously and so I hope none of this comes as any great surprise. What we have done is try and set out the science underlying the parameters so that it is clear to all bidding parties and available for scrutiny as necessary. We have also endeavoured not to err into HRW masterplanning, which is clearly for the Council and its partner.

We'll obviously be guided by you on how you want any engagement to take place, but this is clearly not a subject matter that can be adequately conveyed in a single document, no matter how comprehensive it is. The spate of recent terror attacks has tragically emphasised the crucial need to design such public spaces which will carry high pedestrian flows with the utmost care and so we would anticipate further, extensive engagement on this issue.

I should therefore be grateful if you would advise on the next steps in the process and how the contents of this document will be dealt with.

Kind regards

Richard



**Richard Serra MRICS MRTPI**  
Head of Planning

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F: +44 (0)20 8365 5037  
E: [richard.serra@tottenhamhotspur.com](mailto:richard.serra@tottenhamhotspur.com)

**Tottenham Hotspur Football & Athletic Co Ltd**  
Lilywhite House, 782 High Road, London, N17 0BX

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# FIXED DESIGN PARAMETERS FOR THFC STADIUM / WHL STATION LINK

JULY 2016

Fixed Design Parameters for THFC Stadium / WHL Station Link  
 Report for Tottenham Hotspur FC  
 July 2016

## REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1.0	18 July 2016	Fixed Design Parameters for THFC Stadium / WHL Station Link	Maïlys Pineau / Francisco Nieto Consultants (Movement Strategies)	Simon Owen Director (Movement Strategies)	Simon Ancliffe Chairman (Movement Strategies)
1.0	18 July 2016	Fixed Design Parameters for THFC Stadium / WHL Station Link	Nigel Koch Senior Landscape Architect (Populous)	Tom Jones Senior Principal (Populous)	
1.0	18 July 2016	Fixed Design Parameters for THFC Stadium / WHL Station Link	Tim Spencer (Tim Spencer & Co.)		
1.1	19 July 2016	Fixed Design Parameters for THFC Stadium / WHL Station Link	Francisco Nieto Consultant (Movement Strategies)	Simon Owen Director (Movement Strategies)	Simon Ancliffe Chairman (Movement Strategies)

## DISTRIBUTION

Rev	Date	Name	Organisation
1.0	18 July 2016	Richard Serra	THFC
1.1	19 July 2016	Richard Serra	THFC

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# 1. EXECUTIVE SUMMARY



- 1.0.1. In May 2016, Haringey Council began the process of procuring a developer partner for High Road West (“HRW”). One of the key components of any masterplan for HRW is the interface between the new Tottenham Hotspur Football Club (“THFC”) Stadium and the reconfigured White Hart Lane Station (“WHLS”) and in particular, the link space between the two. The link will also provide a route between WHLS and Northumberland Park to the east of the Stadium, which is also a major regeneration project.
- 1.0.2. The new Stadium is scheduled to open in August 2018 and will accommodate 61,142 spectators (compared with 36,284 at the existing stadium). The HRW works are scheduled to start after the Stadium opens and be completed over 9 years. WHLS is scheduled to open in July 2018. There is also a Local Improvement Plan (“LIP”) that will be developed and implemented to enhance White Hart Lane and Love Lane.
- 1.0.3. Movement Strategies, Populous and Tim Spencer & Co have been commissioned by THFC to provide a brief to Haringey Council setting out the requirements associated with accommodating crowd flows to and from the Stadium safely and comfortably through the area to the west of the High Road. Given the high volumes of people who will be moving through this area on a Major Event Day, it is important that the crowd flow and urban design aspects relating to the Stadium are key input parameters to the development work in adjacent areas.
- 1.0.4. Whilst the Stadium will regularly be used for THFC football matches, there are plans for other full ‘capacity’ Major Event, such as NFL and concerts. Travel patterns and crowd behaviour at these high attendance events will be different and the Stadium and its environs will need to accommodate all of these scenarios.
- 1.0.5. Furthermore and in light of recent acts of terrorism; the Club, the Council and other security stakeholders will need to be increasingly mindful of the need to keep spectators safe, which will require a flexible but well planned approach to public realm around the Stadium.
- 1.0.6. This document has been prepared for THFC at the request of Haringey Council to provide a set of crowd flow and urban design principles that will be adopted as fixed parameters within any new masterplan for HRW.
- 1.0.7. In summary, the design parameters are:
- Direct line of sight and consideration of building heights between the new WHLS eastern entry/exit and the main west entrance of the Stadium to provide a sense of place and arrival and natural wayfinding for spectators and other visitors to the Stadium, adjacent destinations and Northumberland Park.
  - Creation of a public space that provides a sense of arrival and clear orientation to the new Stadium.
  - Width of **25m** or more in aggregate for access route(s) between WHLS and the access points to the western side of the Stadium to allow for safe and comfortable crowd flow. The width comprises a minimum of 17.5m for crowd flow and allowance of approximately 3 to 4m or more on each side of all access route(s) for active frontage and street furniture.
  - Sufficient space for spectators to queue safely before crossing Tottenham High Road in the pre-Major Event period, whilst allowing for circulation along the High Road. Based on emerging operational plans for the transport network and the Station, space of up to **295m<sup>2</sup>** should be set aside on the western side of the High Road in aggregate for the two crossings opposite the Stadium to accommodate the worst case scenario. More definition of the space will be required as the transport plan and Stadium Event Local Area Management Plan (“LAMP”) evolves.
  - Sufficient clear pavement width on the western side of the High Road to allow for safe crowd flow north and south along the pavements before a Major Event. A clear width of **7m** is recommended although the requirement will be influenced by the proposed configuration of routes and buildings in this area.
  - A station plaza to allow for queuing to access the station during the post-Major Event period. A footprint of **1,470m<sup>2</sup>** is required.
  - The masterplan should support the Stadium Event LAMP, which is a requirement of the Stadium planning permission. It describes the traffic and crowd management arrangements in the area surrounding the Stadium that are required to enable spectators to move safely to/from the venue on a Major Event Day. These include, *inter alia*, a Match-day Controlled Parking Zone and closure of the

High Road to traffic in the immediate post-event period (30 minutes following the final whistle). The Stadium Event LAMP has not yet been developed, but the process for doing so will need to take account of the design development activity for the HRW.

- Spatial provision for security infrastructure needed to protect crowded places and spaces.
- Construction phasing for the HRW that continues to allow sufficient access for the safe and comfortable operation of the Stadium and associated transport particularly on Major Event Days.

1.0.8. The basis of these requirements including the quantitative space requirements are described in this document.

1.0.9. This document is intended as early guidance to inform the Council and bidding parties for HRW. It should form the basis of ongoing wider discussions around the interface between the Stadium and HRW, which is key to the success of both schemes.

## 2. INTRODUCTION



- 2.0.1. In May 2016, Haringey Council began the process of procuring a developer partner for High Road West (“HRW”). One of the key components of any masterplan for HRW is the interface between the new Tottenham Hotspur Football Club (“THFC”) Stadium and the reconfigured White Hart Lane Station (“WHLS”) and in particular, the link space between the two. The link will also provide a route between WHLS and Northumberland Park to the east of the Stadium, which is also a major regeneration project.
- 2.0.2. The new Stadium is scheduled to open in August 2018 and will accommodate 61,142 spectators (compared with 36,284 at the existing stadium). The HRW works are scheduled to start after the Stadium opens and be completed over 9 years. WHLS is scheduled to open in July 2018. There is also a Local Improvement Plan (“LIP”) that will be developed and implemented to enhance White Hart Lane and Love Lane.
- 2.0.3. Movement Strategies, Populous and Tim Spencer & Co have been commissioned by THFC to provide a brief to Haringey Council setting out the requirements associated with accommodating crowd flows to and from the Stadium safely and comfortably through the area to the west of the High Road. Given the high volumes of people who will be moving through this area on a Major Event Day, it is important that the crowd flow and urban design aspects relating to the Stadium are key input parameters to the development work in adjacent areas.
- 2.0.4. Furthermore and in light of recent acts of terrorism; the Club, the Council and other security stakeholders will need to be increasingly mindful of the need to keep spectators safe, which will require a flexible but well planned approach to public realm around the Stadium.
- 2.0.5. This briefing document describes the various considerations, spatial specifications for crowd flow, urban design and wayfinding principles, that together represent the Fixed Design Parameters west of the new Stadium to satisfy the Major Event Day requirements.
- 2.0.6. The remainder of this document is structured as follows:
- Section 3 describes the geographical fixes in the area.
  - Section 4 presents the urban design requirements.
  - Section 5 details operational considerations for a Major Event Day scenario.
  - Section 6 states other crowd flow requirements.
  - Section 7 explains the Design Standards adopted to calculate the spatial requirements.
  - Section 8 presents the results of the calculations.
  - Section 9 details the need to take into account construction phases for the various developments in the area.
  - Section 10 describes the Fixed Design Parameters arising from the requirements.
- 2.0.7. This document is intended as early guidance to inform the Council and bidding parties for HRW. It should form the basis of ongoing wider discussions around the interface between the Stadium and HRW, which is key to the success of both schemes.

# 3. GEOGRAPHICAL FIXES



## 3.1. Overview

3.1.1. There are a number of elements of the Stadium-WHLS 'network' that are geographically fixed and that provide the context for High Road West with respect to spectator movement. These are illustrated in overview in Figure 1.

3.1.2. These elements are pre-existing infrastructure or have planning consent.

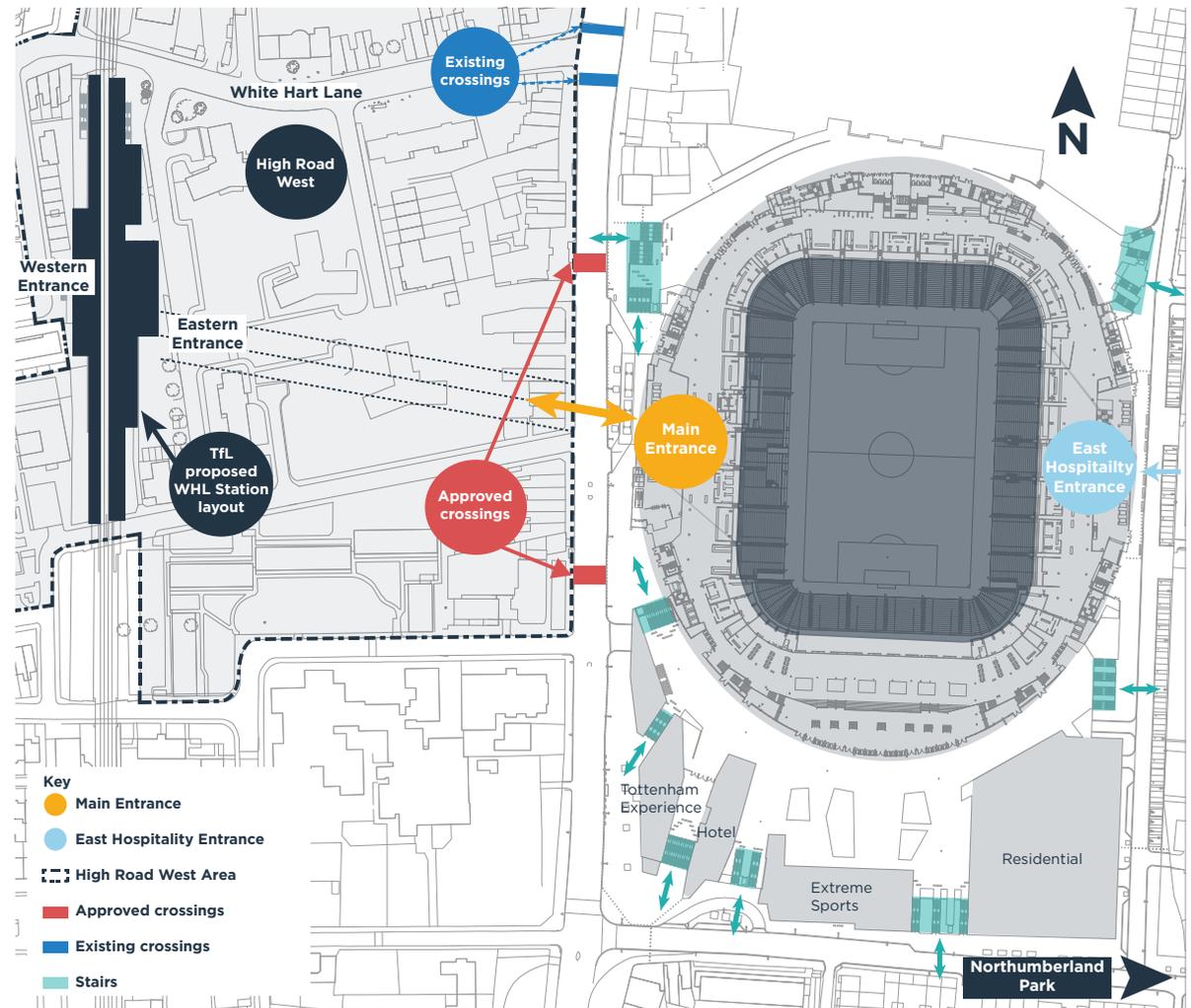
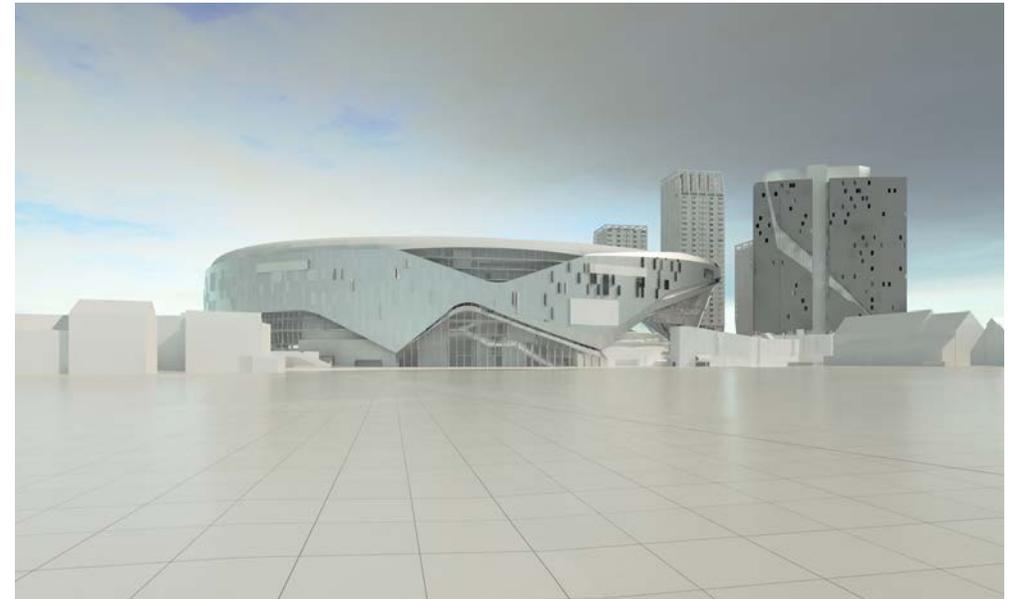


FIGURE 1 The key fixed elements that create the geographical context for High Road West

### 3.2. The Stadium

- 3.2.1. The main entrance to the new Stadium faces onto and is adjacent to the High Road. It provides both a dramatic landmark for the area and natural wayfinding for visitors approaching the Stadium, the Tottenham Experience (shop, museum and tours), the Hotel, the Extreme Sports centre, residential units and beyond to the Northumberland Park area.
- 3.2.2. The Stadium sits on a podium that will be accessed via the main staircases located at each of its four quadrants (north-west, north-east, south-west and south-east) and from stairs linking to Park Lane in the south.
- 3.2.3. The stairs facing west onto the High Road are key access points for the Stadium for spectators approaching from the north, south and west and are forecast to accommodate 80% of the total arrivals.
- 3.2.4. Between 20% and 24% (12,200 - 14,700) of General Admission spectators depending on the type of event\* are forecast to arrive via WHLS and other points to the west of the High Road.
- 3.2.5. The detailed forecasting of spectator flows is being continuously refined by THFC, as new information emerges in the period prior to - and after - the new Stadium opening.
- 3.2.6. Updated and detailed forecast spectator flows will be provided to Haringey Council and its appointed developer on request.

\*See section 7.3.

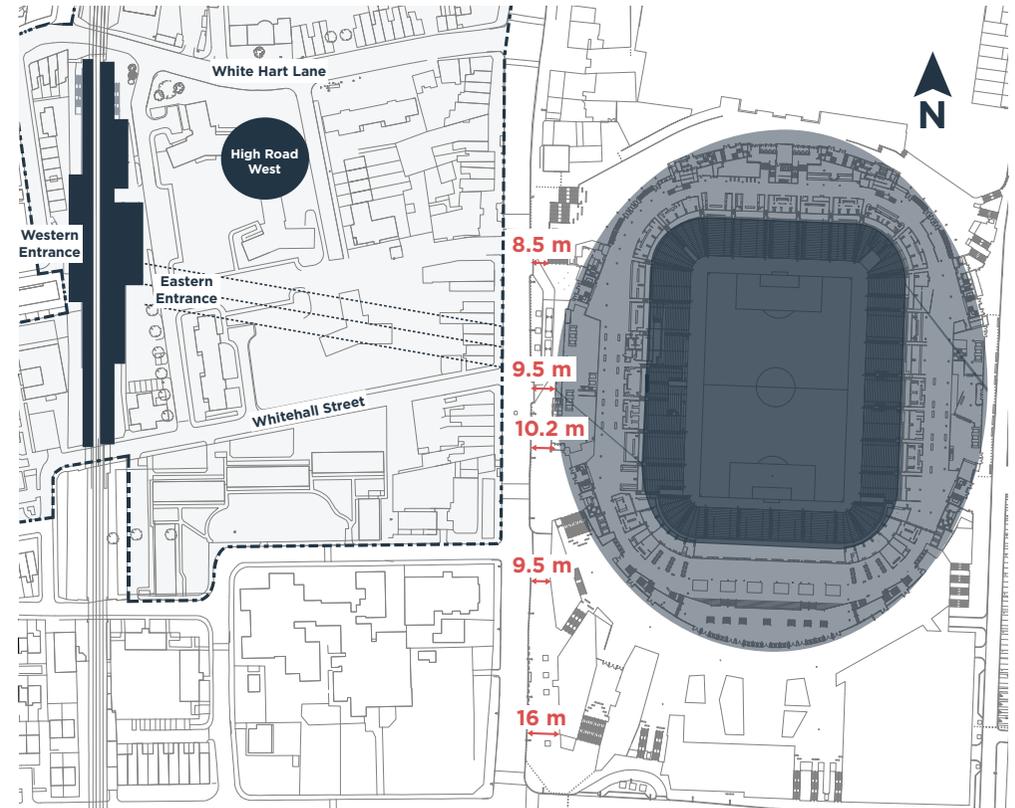


**FIGURE 2** View of the Main Entrance and western elevation of the new Stadium

### 3.3. Tottenham High Road

- 3.3.1. Tottenham High Road (the A1010) is a Haringey Council adopted highway that is part of the TfL Designated Road Network. It will be open to traffic pre-Major Event but will be closed to traffic for a period of approximately 30 minutes during egress after the post-Major Event (or during emergency evacuation).
- 3.3.2. The Stadium is set back from the High Road by 8.5m or more to allow for crowds to move up and down the High Road safely without there being a requirement to step into the High Road when the road is open to traffic.
- 3.3.3. Addressing this risk in the context of the existing stadium was an important part of the 2015 successful planning permission and listed building consent (HGY/2015/3000, HGY/2015/3001).
- 3.3.4. It is also a requirement for crowds to move up and down the western edge of the High Road safely (i.e., without stepping into traffic) particularly between White Hart Lane and Whitehall Street. More clear width (i.e., after allowance for street furniture and edge effects\*) than is currently provided, which is sub-optimal, will likely be needed for new Masterplan. Whilst it is possible to indicate a width requirement in this vicinity, to some degree this will be influenced by the proposed configuration on buildings and walkways in this area. This is discussed further in section 8.

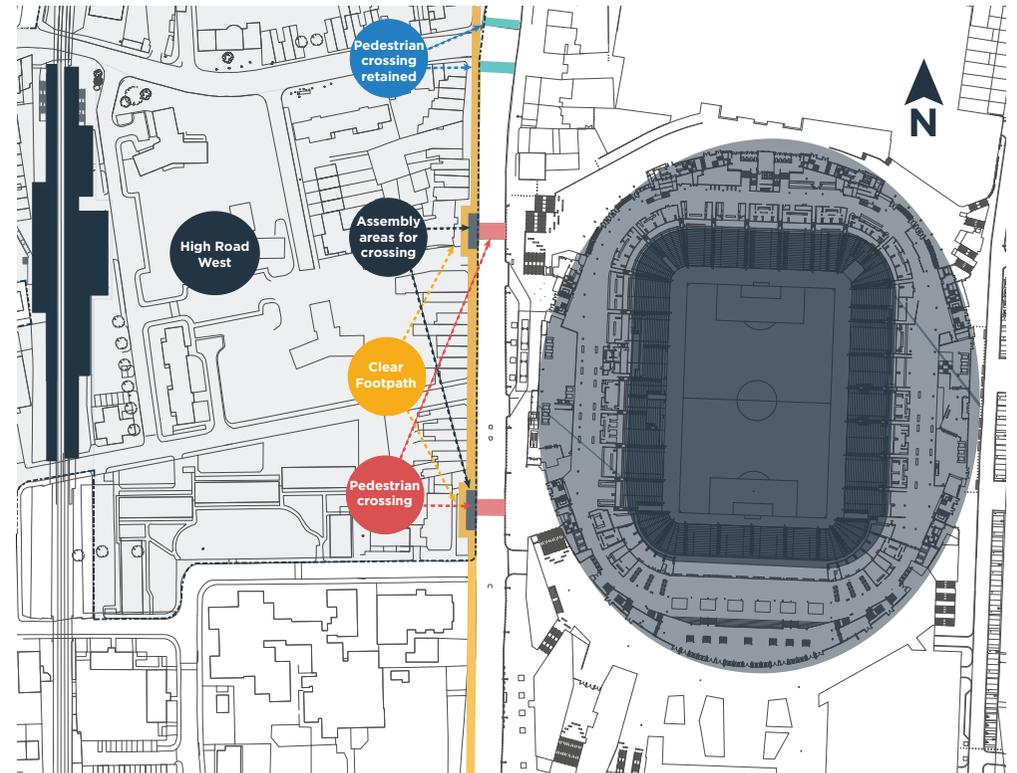
\*See TfL Pedestrian Comfort Guidance, 2010.



**FIGURE 3** High Road eastern pavement measurements

### 3.4. Pedestrian Crossings

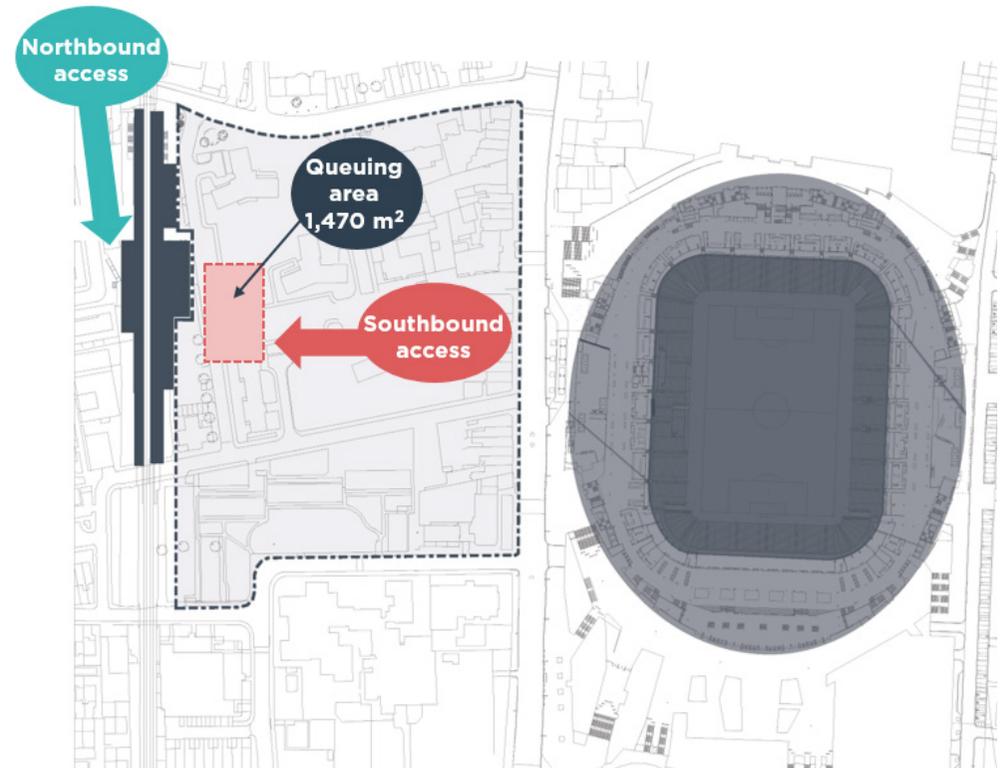
- 3.4.1. The outline design of two 7m wide pedestrian crossings adjacent to the Stadium has been agreed with Haringey Council, although the traffic signal times have not been finalised. The crossings are located adjacent to the principal access stairs to the Stadium podium.
- 3.4.2. The HRW masterplan must provide sufficient circulation width through the masterplan area and along the High Road to safely access and queue at the crossings before the green man element of each cycle.
- 3.4.3. Circulation and queuing space are identified in section 8 of this document.
- 3.4.4. Our working assumption is that the existing pedestrian crossings at White Hart Lane are retained. Details of the traffic signal cycle times on an Major Event Day have yet to be finalised.



**FIGURE 4** Clear areas required at pedestrian crossings

### 3.5. White Hart Lane Station

- 3.5.1. White Hart Lane Station will be redeveloped by Transport for London. The current points of access to the station are located north of the Stadium and at the northern end of HRW, corresponding to the northern edge of the platforms.
- 3.5.2. The design proposals for the new station shows entrances/exits located in an area which corresponds with the middle of the platforms.
- 3.5.3. The east and west entrances to the new WHLS concourse will be operational at all times and the majority will access to/from the east side.
- 3.5.4. The means by which the spectators arriving/leaving the stadium are managed or directed via White Hart Lane/HRW will be determined by the Stadium, Major Event LAMP that will evolve as the WHL LIP and HRW developments are implemented.
- 3.5.5. It is proposed that during the post-event, both sides of the station are used, but segregating access for southbound passengers to the east of the station and northbound passengers to the west.
- 3.5.6. Following an event at the Stadium the spectator flows to the station will be significantly higher than the train service and platforms can accommodate and queues will build up outside the station. A station plaza is needed to provide queuing space.
- 3.5.7. This will need to be located and shaped to facilitate queuing and access to the queue by spectators approaching from different directions and proportions, depending on the event type and time. Both platforms have the capability of accommodating 8-car trains and on Major Event Days it is assumed that all trains in both directions will run in an 8-car configuration.
- 3.5.8. The footprint required for this queuing area is discussed in section 8.



**FIGURE 5** Location of HRW and WHL Station, with indicative queuing area/access points for northbound and southbound travellers in the post-Major Event period

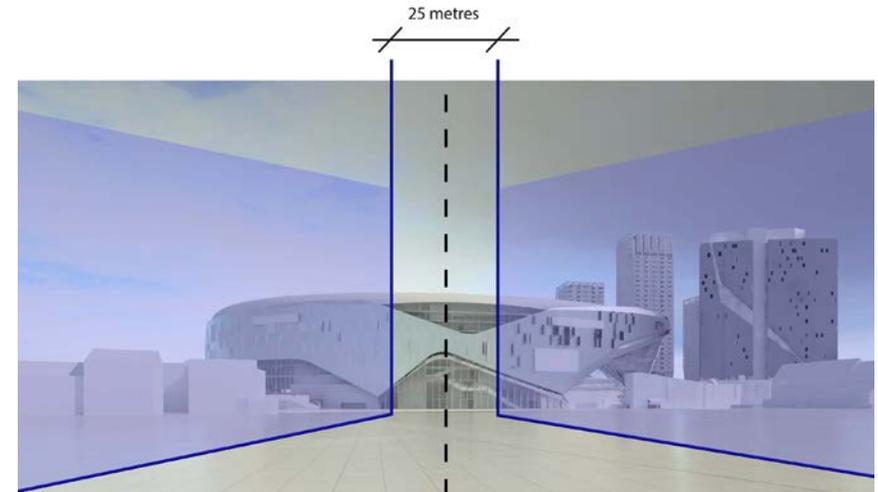
### 3.6. White Hart Lane

- 3.6.1. Many spectators for the Stadium and day to day activities in the area will originate in destinations to the north and west of White Hart Lane.
- 3.6.2. The Stadium transport plan includes shuttle buses to/from Alexandra Palace and Wood Green pick up/drop off points to the north and west of WHLS. Popular pre-Major Event or post-Major Event destinations located north and west of the Stadium will influence patterns of demand in this vicinity, as would the desirability of any such facilities provided within the HRW itself. White Hart Lane and/or Whitehall Street will be used by spectators arriving and departing on foot, to/from informal car parking and shuttle buses, as well as those arriving and departing WHLS. Whitehall Street may be removed in the HRW Masterplan.
- 3.6.3. As a result, there will be a need to accommodate these varying flows in the Stadium vicinity both in pre-Major Event or post-Major Event periods, reflecting distinct desire routes.
- 3.6.4. The routings of spectators between these origins and destinations is influenced by:
- The station entry/exit points.
  - The street network.
  - The traffic management plan (for the High Road).
  - The crowd management plan (for the Station).
- 3.6.5. As these four elements are anticipated to evolve when the new Stadium becomes operational and the various redevelopment schemes are completed, the routing of spectators to the west of the Stadium will also evolve to adjust to the new conditions.

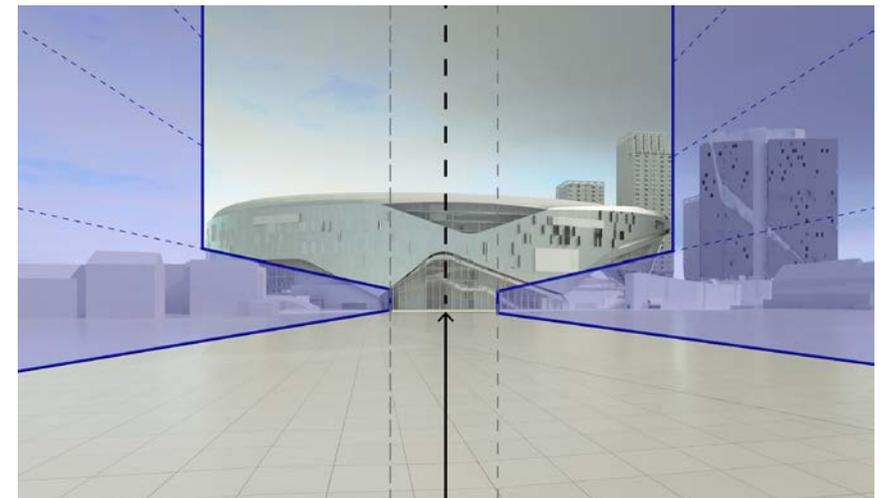
# 4. URBAN DESIGN



- 4.0.1. The future of the HRW regeneration area and the contextual consideration of the WHLS and the connectivity to the Stadium is paramount for successful place making and to create a healthy and vibrant community.
- 4.0.2. The new Stadium will play a pivotal role in drawing people to the commercial offerings of the HRW and will be a significant visual focus and backdrop to the future development as people arrive into WHLS and then walk through the development to the High Road and Stadium.
- 4.0.3. Crowd movement and the provision of adequate space for crowds is an essential consideration in the development of the HRW. From an urban design perspective the aspect of key view lines that assist pedestrian navigation and establish their sense of place is integral in this requirement.
- 4.0.4. There is the need to create suitably sized places that can accommodate large crowds during pre-Major Event and post-Major Event and be flexible and adaptive to address the needs of the community on a day to day basis.
- 4.0.5. Major public buildings act as key points of orientation within a city and benefit from careful planning of approach routes and orientation within the wider public realm. A number of key buildings within London benefit from this master-planning strategy, including the examples of Wembley Stadium and St. Paul's Cathedral illustrated in section 4.1 and 4.2.
- 4.0.6. The impact of the overall shape and design of a building can be lost if the routes are framed too tightly and the surrounding context impinges on the perimeter of the form. The impact of approaching Wembley Stadium along Olympic Way is enhanced by the ability to see the roof arch passing up and over both sides of the Stadium and a similar principle would apply to the setting of the new Stadium. See Figure 6.
- 4.0.7. The legibility of the Stadium is dependent on being able to read the curved façade to the north and the arched prow to the south and therefore development along the main axis will need to be carefully designed to avoid losing these views of the Stadium.



**FIGURE 6** Sample sight-line and view along a direct access route between White Hart Lane Station and the Stadium.



**FIGURE 7** Indication of building set-backs to reveal Stadium up on exiting from the WHL Station.

#### 4.1. Urban Design Precedents: Wembley Stadium



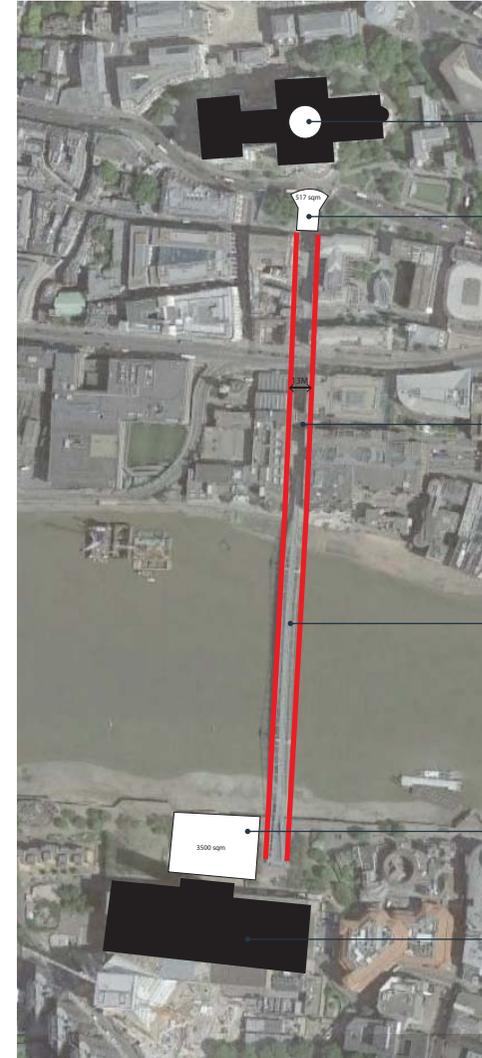
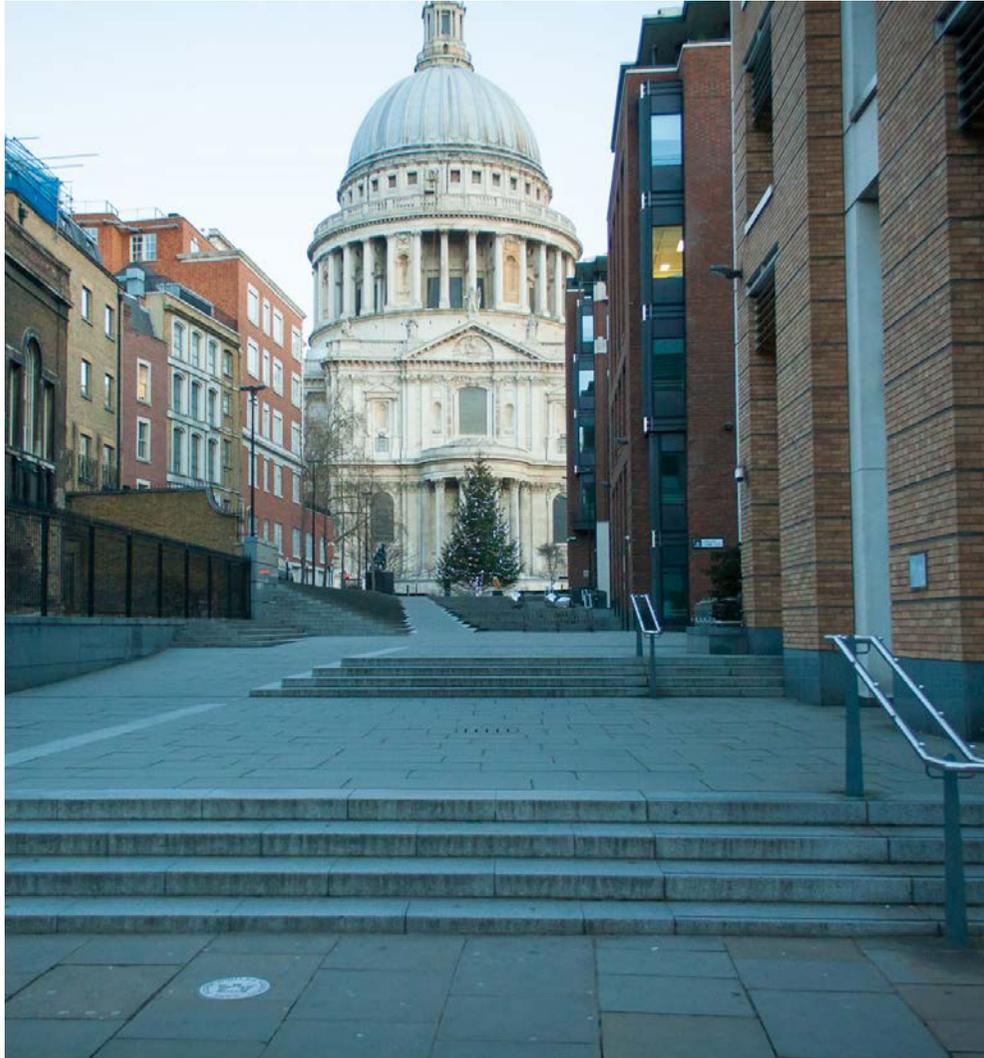
Wembley Park Station

Wembley Park Station Square  
(1600m<sup>2</sup>)

Olympic Way  
(width 25m)

Wembley Stadium

## 4.2. Urban Design Precedents: St. Paul's Cathedral/Tate Modern



St. Paul's Cathedral

Carter Lane Garden  
(517m<sup>2</sup>)

Peter's Hill  
(width 13m)

Millennium Bridge

Tate Modern FOH Garden  
(3500m<sup>2</sup>)

Tate Modern

# 5. OPERATIONAL CONSIDERATIONS



- 5.0.1. Whilst the key purpose of this document is to set out design principles and spatial parameters associated with accommodating event-day flows, there are important operational considerations that will affect the movement of people through HRW.
- 5.0.2. As part of the planning permission, THFC committed to producing a framework in advance of the Stadium opening that would agree the detail of operations on a Major Event Day. One of these is the Stadium Event LAMP, which includes the traffic and crowd management arrangements in the area surrounding the Stadium that are required to enable spectators to move safely to/from the venue on a Major Event Day. Whilst the guiding principles are set down in the S.106, the LAMP has not yet been developed and agreed, but there are number of proposed measures that are likely to be included, which should be factored into the planning and design process:
- The Match Day Controlled Parking Zone extends to cover the HRW area.
  - The High Road remains open to traffic in the pre-event period.
  - The High Road is closed to traffic in the immediate post-event period (30 minutes following the final whistle). This could mean that White Hart Lane to the east of the station is traffic free.
- 5.0.3. Match day timetables and extended trains of 8-car configuration will be serving WHLS (but other travellers will also be able to use the services and the station).

# 6. OTHER CONSIDERATIONS



## 6.1. Active Frontage

- 6.1.1. A further consideration is the impact of the buildings themselves and what facilities are provided that influence behaviour. It is likely that the frontages of the buildings on the route(s) between the Station and the Olympic Stadium will include bars and catering outlets within HRW that will attract spectators and there will be people gathered outside.
- 6.1.2. Space should therefore be provided for these uses in the design; as well as for accommodating crowd flow. A proxy for this is at Stratford, where movement between the station and the Olympic Stadium includes passage through the Westfield Shopping Centre boulevards. Observations were undertaken during an event at the main stadium to review how much space should be retained to enable 'active frontages' to work effectively without impacting negatively on crowd flows.
- 6.1.3. As can be seen on the pictures to the right, commercial use of the buildings in Stratford leads to people gathering in a formal (orderly queues for restaurants) or informal (groups chatting outside the pubs) fashion, occupying approx. 3m of the space reserved for circulation. Should buildings have active frontages on each side of the route(s), the buffer should be applied to each side. An allowance for street furniture may also be needed.

## 6.2. Security Infrastructure

- 6.2.1. The access routes and any areas where crowds gather pre-event or post-event (e.g., to watch video screens) will be crowded places and should follow relevant guidance for the protection of crowded places and spaces issued by NaCTSO (e.g., <https://www.gov.uk/government/collections/crowded-places>) and other relevant guidance.
- 6.2.2. This will likely require hostile vehicle mitigation measures such as bollards, which should be high enough to be visible to spectators within a crowd. Bollards will be installed along the eastern of the High Road near the Stadium.
- 6.2.3. In the THFC context, the queuing area ('plaza') to access WHLS is one such example where the guidance must be considered.



**FIGURE 8** Active frontages in Westfield Shopping Centre, Stratford, before the AC/DC concert at the Olympic Stadium (4th June 2016). Top: orderly queue for a restaurant. Bottom: informal dwelling in front of a pub.

# 7. CROWD FLOW REQUIREMENTS



## 7.1. Design Standards

- 7.1.1. Spectator movement through HRW will take place during the pre-event and post-event period. To define the space required to accommodate these crowd flows, it is necessary to understand the likely volume of demand moving between different locations at different times and the desired 'crowd conditions' at peak times – defined in terms of rate of flow for circulation, or density for queues.
- 7.1.2. For the purpose of developing plans, the desired crowd conditions are described as Design Standards. Different standards apply during pre-event and post-event and the make-up of the crowd may also affect the choice of standard.
- 7.1.3. We have adopted Fruin standards as the basis for our calculations, rather than TfL Pedestrian Comfort Guidance. TfL Pedestrian Comfort Guidance is most applicable to 'Street Design' in day to day conditions rather than accommodating bulk crowd flows associated with an event.
- 7.1.4. Clearly, the HRW masterplan will need to consider implications of street furniture, edge effects and desired day to day comfort levels and pedestrian flows in setting out its streets.

7.1.7. Table 1 and Table 8 highlight the metrics behind each of these categories as defined in Fruin's reference book Pedestrian Planning and Design (1971).

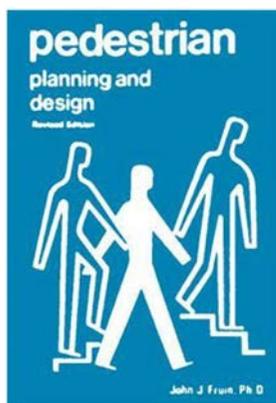
Level of Service	Walk Flat Ground
	(People / m / min)
A	≤ 23
B	23 - 33
C	33 - 49
D	49 - 66
E	66 - 82
F	> 82

**TABLE 4** Fruin's Walkways Level of Service (flow rates)

Level of Service	Queuing density
	(m <sup>2</sup> / person)
A	≥ 1.21
B	0.93 - 1.21
C	0.65 - 0.93
D	0.28 - 0.65
E	0.19 - 0.28
F	≤ 0.19

**TABLE 8** Fruin's Queuing Level of Service (density)

### FRUIN LEVELS OF SERVICE



- 7.1.5. The Level of Service concept for pedestrian flow was developed by Professor Fruin, (described in Pedestrian Planning and Design, Fruin, 1971) and is the most widely applied basis of quantitative assessments of crowded places.
- 7.1.6. The concept relates crowd density, flow rate and pedestrian experience and is defined from LoS A (the least crowded, most comfortable) to LoS F (most crowded, least comfortable). It forms the basis of standards applied in different types of buildings and places, particularly those applying to high crowd flow environments, for example London Underground's Station Planning Standards and Guidelines. The Guide to Safety at Sports Grounds guidance, published by the Sports Grounds Safety Authority, includes crowd densities and flow rates in its guidance.

## FRUIN'S WALKWAY LEVEL OF SERVICE



**Level of Service A**  
 Flow rate: 0 -23 p/m/min  
 Density: > 3.23 m<sup>2</sup>/person

Normal walking speed can be freely selected and slower pedestrians can be overtaken easily. Crossing conflicts can be easily avoided.



**Level of Service B**  
 Flow rate: 23 -33 p/m/min  
 Density: 3.23 - 2.33 m<sup>2</sup>/person

Sufficient space is available to select normal walking speed and to bypass other pedestrians in primarily one-directional flows. Where there are reverse-direction or crossing movements, minor conflicts will occur.



**Level of Service C**  
 Flow rate: 33 -49 p/m/min  
 Density: 2.33 - 1.39 m<sup>2</sup>/person

Restricted ability to select normal walking speed and pass others. High probability of conflict where crossing movements and counter-flows exist. Conflict avoidance requires frequent adjustment of walking speed and direction. However flow is reasonably fluid.



**Level of Service D**  
 Flow rate: 49 -66 p/m/min  
 Density: 1.39 -0.93 m<sup>2</sup>/person

Restricted walking speed. Overtaking is difficult, cross-flows are restricted. There is some probability of intermittently reaching critical density, causing momentary stoppages of flow.



**Level of Service E**  
 Flow rate: 66 -82 p/m/min  
 Density: 0.93 - 0.46 m<sup>2</sup>/person

Restricted walking speed and passing ability. Forward movement only by shuffling. Counter-flows and crossing movements extremely difficult. Flow volumes approach limit of walking capacity.



**Level of Service F**  
 Flow rate: restricted, lower than LoS E  
 Density: <0.19 m<sup>2</sup>/person

Severely restricted walking speed. Frequent contact. Cross-flows are virtually impossible. Pedestrian flow is sporadic & unstable.

**FIGURE 9** Fruin's Walking Level of Service categories (1971) as observed in an urban environment (Queen's Walk, London, 2015).

## FRUIN'S QUEUING LEVEL OF SERVICE



**Level of Service A**  
 Space:  $\geq 1.21 \text{ m}^2/\text{person}$   
 Density:  $\geq 0.83 \text{ persons} / \text{m}^2$

Space is provided for standing and free circulation through the queuing area without disturbing others.



**Level of Service B**  
 Space:  $0.93 - 1.21 \text{ m}^2/\text{person}$   
 Density:  $0.83 - 1.08 \text{ persons} / \text{m}^2$

Space is provided for standing and restricted circulation through the queue without disturbing others.



**Level of Service C**  
 Space:  $0.65 - 0.93 \text{ m}^2/\text{person}$   
 Density:  $1.08 - 1.54 \text{ persons} / \text{m}^2$

Space is provided for standing and restricted circulation through the queuing area by disturbing others.



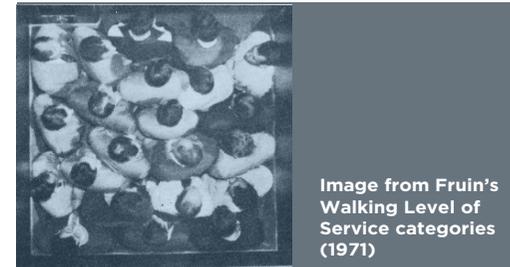
**Level of Service D**  
 Space:  $0.28 - 0.65 \text{ m}^2/\text{person}$   
 Density:  $1.54 - 3.57 \text{ persons} / \text{m}^2$

Space is provided for standing without personal contact with others, but circulation through the queuing area is severely restricted, and forward movements is only possible as a group.



**Level of Service E**  
 Space:  $0.19 - 0.28 \text{ m}^2/\text{person}$   
 Density:  $3.57 - 5.26 \text{ persons} / \text{m}^2$

Space is provided for standing, but personal contact with others is unavoidable. Circulation within the queuing area is not possible. This level of area occupancy can only be sustained for short periods of time without physical and psychological discomfort.



**Level of Service F**  
 Space:  $\leq 0.19 \text{ m}^2/\text{person}$   
 Density:  $\geq 5.26 \text{ persons} / \text{m}^2$

Space is approximately equivalent to the area of the human body. Standing is possible, but close unavoidable contact with surroundings standees causes physical and psychological discomfort. No movement is possible, and in large crowds the potential of panic exists.

**FIGURE 10** Fruin's Queuing Level of Service categories (1971) as observed within a lift environment.

## 7.2. Choice of Design Standards

7.2.1. To calculate the spatial requirements for spectator flows, we have used the following design standards:

### Circulation on flat ground:

- Pre-Major Event period: Service level B
- Post-Major Event: Service Level C

7.2.2. We have used different standards for the pre-event and post-event periods to account for different circulation conditions and expectations of visitors.

7.2.3. In the pre-event period, the area will experience complex movement patterns, with significant volumes of crossflows due to arrival from different directions, numerous meeting points, spectators dwelling and attractions. The ingress period lasts for more than 90 minutes with a 30 minute peak and spectators expectations of comfort are higher than in the short egress period when higher levels of crowding are anticipated by spectators and movement is largely uni-directional away from the Stadium.

### Queuing densities:

7.2.4. For both pre-event and post-event periods we have assumed a service level between C and D (0.5 m<sup>2</sup>/person). This aspired density level has been selected given that any queues to enter buildings and to cross roads will be 'shuffling' rather than 'holding' at most times.

## 7.3. Event Types

7.3.1. In the planning application submitted in September 2015, a number of scenarios were modelled to assess the impact of various event types on the transport network

7.3.2. These scenarios are:

- Football Midweek, 61,000
- Football Weekend, 61,000
- NFL, 61,000
- Concert 45,000
- Concert 55,000

7.3.3. We have considered all scenarios when determining the spatial requirements for the HRW, as they have different profiles as well as a different mix of onward destinations and therefore proportion of people using the area.

# 8. SPATIAL REQUIREMENTS



8.0.1. Both pre-Major Event and post-Major Event periods present challenges when determining spatial requirements, not only because of profiles and preferences of spectators, but also because routings differ from one period to another. In the context of the HRW, both have a role to play in determining capacity.

## 8.1. Ingress

### 8.1.1. Width for crowd flow

- 8.1.1.1. Upon ingress (to the Stadium), the spatial requirements are partly driven by WHLS, where, in a worst case scenario, two fully loaded trains could arrive simultaneously on the platforms. Flows from the station on entry will be dictated by train arrival patterns plus station clearance time, so demand may be condensed into a 5-6 minute period.
- 8.1.1.2. The station is intended to operate with the majority of spectators exiting the station to the east of the railway tracks. To ensure that spectators can clear away from the station, the width of the route towards the Stadium should be at least as wide as the aggregate exit capacity of the station. Based on our understanding of TfL plans, this equates to 10m.
- 8.1.1.3. However, provision of this width would result in a high density experience as spectators move between the Station and the Stadium at peak time – effectively creating a ‘crowd’ experience in which the landscape and masterplan area is bypassed rather than ‘enjoyed’. It is therefore recommended that the planning basis for capacity of this route during ingress is a less dense condition. Based on max Fruin LoS B (see section 7), this equates to 15.5m.
- 8.1.1.4. The base assumption is that all spectators arriving from origins west of the station will do so via White Hart Lane and would therefore not need to be accommodated by the route within the masterplan. This includes arrivals from the shuttle bus service, local car parking and on foot, which would all have a relatively flat demand profile.
- 8.1.1.5. There may be developments above and beyond the masterplan (or operational strategies) that mean that those spectators from other origins beyond the station would not use White Hart Lane. For example, there is another access route (Whitehall Street) under the railway lines to the south of the station. If this route was the

principal one, then these spectators would also need to be accommodated by the routes passing through the masterplan. Using the arrival profiles for the NFL scenario as adopted in the TA, the peak demand flow from west of the station towards the Stadium would require an additional 2m to achieve the comfortable conditions which would be expected in this area (Fruin LoS B). This would be an aggregate clear width of 17.5m.

### 8.1.2. Space for Crossings

- 8.1.2.1. Having passed through the HRW area, the spectators will then need to cross the High Road (which will be open to traffic throughout the pre-Major Event period). These would be pelican crossings and will therefore result in queues forming whilst spectators wait for the ‘green man’. A similar arrangement would be in place at the junction of White Hart Lane and the High Road. Sufficient space should be supplied to accommodate these queues within the masterplan. Initial calculations (based on a 24s green signal per 90s) and simultaneous arrival of two trains, suggest that a queue space for up to 530 people should be set aside –approximately 265m<sup>2</sup>. Should this space be required to also accommodate flows originating west of the station, a queue space for up to 590 people should be set aside in the worst case scenario – approximately 295m<sup>2</sup> across two crossings.

### 8.1.3. High Road Western Pavement

- 8.1.3.1. There are existing constraints associated with pavement widths in the High Road which make it which is sub-optimal for anticipated flows. These width constraints range from 2.8m to 3.3m and any new masterplan should look to resolve these capacity concerns.
- 8.1.3.2. An assessment of pre-match flows along the High Road has informed the layout of the eastern pavement and to provide a similar outcome on the west would necessitate a clear pavement width of up to 7m\*. Note that this does not account for physical infrastructure such as bus shelters, or any edge effects (refer to TfL Pedestrian Comfort Guidance).

\* This calculation is based on an arrival profile at the Stadium consistent with currently observed behaviour and min Fruin LoS B to account for multi-directional flow in this vicinity. This is the peak requirement, in the area immediately adjacent to the western point of the Stadium - demand profiles (and therefore width requirements) vary across the extent of the High Road - and will also be influenced by the design proposals for the HRW themselves.

## 8.2. Egress

### 8.2.1. Peak egress scenario

- 8.2.1.1. The post-event period experiences the highest pedestrian flows due to the high volume surge of departures following the end of the event and the potential for late-night finishes at times of limited available transport capacity.
- 8.2.1.2. In the immediate post-event period the High Road to the west of the Stadium will be closed to traffic. White Hart Lane would also be closed to traffic and the full road width would be available for spectator circulation. As such, crossing points are not an issue for consideration and unless directed otherwise, spectators are assumed to take the most direct path.
- 8.2.1.3. Upon egress, based on an understanding that concert-goers will tend to have a more London-focused set of destinations (i.e., higher propensity for southbound travel) and less of an interest in staying in the local area, this is considered the appropriate scenario to assess for the masterplan design. The concert scenario with 55,000 attendees has been used.
- 8.2.1.4. The key assumptions are:
- 55,000 attendees.
  - 22:00 end time.
  - 65% depart in the 15 min period immediately following the end of the concert.
  - 11,550 depart via White Hart Lane station.
  - 68% of these travel southbound.
  - 3,181 head to destinations to the west of WHLS.
  - A 'typical' Major Event-day timetable is in operation and all trains run at 8-car capacity (which the station operation enables all trains to be filled).

### 8.2.2. Station Access determines Spatial Requirements

- 8.2.2.1. As the newly designed station will have the capability to load passengers from both sides of the station, it is likely that northbound passengers would be directed to the west of the station and the southbound passengers directed to the east (via the masterplan area). Note that the most likely route to access the northbound platform from the High Road is via White Hart Lane.
- 8.2.2.2. The train capacity will be the determining factor in the ability to clear spectators away from the local area and will influence the rate at which queues form outside the station. Other than on the platforms themselves, there is minimal space inside the station for queuing of spectators waiting to board trains. Therefore, during this period, queues will form outside the station. The ability to accommodate these queues safely and comfortably in this area needs to be reflected by the masterplan. The spatial requirement for this is considered below.
- 8.2.2.3. The routes between the High Road and onward destinations to the west (including the station and other destinations such as the shuttle bus) should not provide any constraints above and beyond the train capacity and therefore the widths of these routes should be adequately sized to ensure that spectator flows on the High Road are not inhibited. With the full width of White Hart Lane (circa 12m) available for pedestrian use and a route(s) through HRW of up to 25m to accommodate ingress plus a plaza area – on the main corridor to/from the station – there would be more aggregate capacity than that provided by the current route configuration.
- 8.2.2.4. In terms of calculating spatial requirements for queuing area, given that the queue to enter the station would be 'shuffling' rather than 'holding' at most times, 0.5m<sup>2</sup>/person density is assumed.
- 8.2.2.5. In the concert scenario, to accommodate the maximum southbound queue of 2,350, a footprint of 1,175m<sup>2</sup> should be set aside. It may be pertinent to design in a 25% buffer to account for disruption and/or issues affecting the operational efficiency of the station or the crowd management – **this suggests a plaza footprint of 1,470m<sup>2</sup>.**

8.2.2.6. The flow towards the southbound queue in this scenario could be 340p/min. To accommodate at the stated flow rate without delays would require 7m. On approach routes, where the flow is uni-directional, a 49p/m/min flow rate (Fruin LoS C/D) is used to assess the requirements.

8.2.2.7. Even applying a 25% 'buffer', this is lower than the capacity requirement for the pre-event period. It is therefore suggested that the corridor of up to 25m for ingress would be adequate – assuming that spectator route choices take place on the High Road.

### **8.2.3. Secondary Routes**

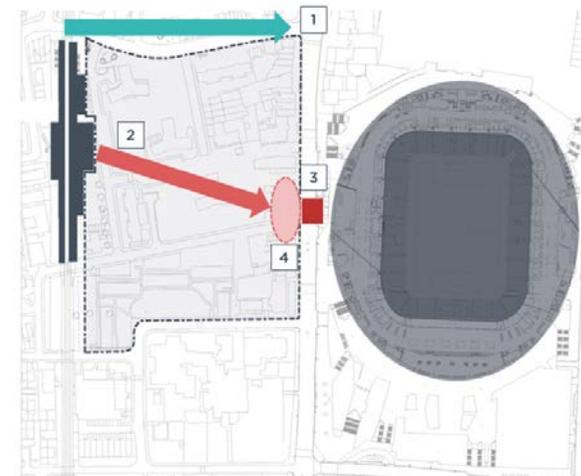
8.2.3.1. A further element is the provision of secondary routes to accommodate crowd flows. If spectators exit the High Road at the 'wrong' point, then consideration needs to be given in the masterplan as to how they are provided the capability to access their final destination. This could be more critical in concert or NFL matches as spectators will be less familiar with the area and in terms of impact on safety and experience, then it should focus on the provision for post-event movements. It will also be important to address the fact that for some spectators, these secondary routes could be the most direct (e.g. people moving from the South Podium to the station to catch Northbound Trains would not naturally use White Hart Lane if there were an alternative route through the masterplan. This requires management intervention, but should be addressed during the design phase).

### **8.2.4. Stadium Evacuation**

8.2.4.1. The masterplan design should also take into account the potential impacts on the space of a full Stadium evacuation. THFC will be developing an Evacuation Management Strategy and Operational Plan in accordance with other partners, including those represented on the Safety Advisory Group. The masterplan Design Team should liaise with this group to ensure that any proposals do not compromise the ability to safely clear the Stadium and its environs in the event of an evacuation.

### 8.3. Summary of Spatial Requirements

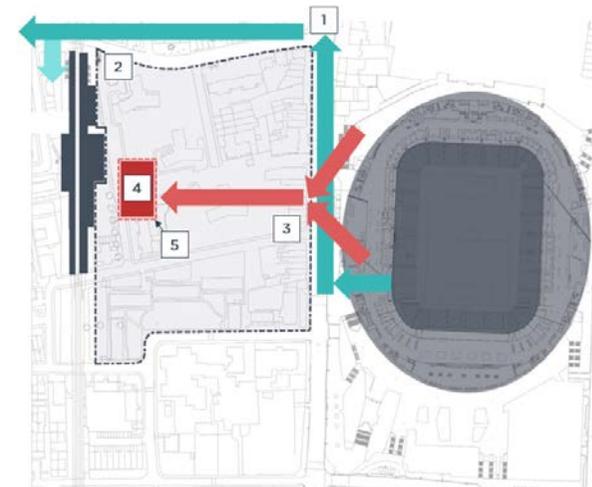
- 8.3.1. Aggregate width of **25m** for access between WHL station and the access points to the western side of the Stadium to allow for safe and comfortable crowd flow. The width comprises 17.5m for crowd flow and allowance of approximately 3 to 4m on each side or more for each access route(s) for active frontage and street furniture.
- 8.3.2. In the pre-Major Event period, sufficient space for spectators to queue safely before crossing Tottenham High Road while allowing circulation should be allowed for. Based on emerging operational plans for the transport network and the station, an allowance of up to **295m<sup>2</sup>** to accommodate the worst case scenario should be set aside. More definition of the space will be required as the transport plan and LAMP evolves.
- 8.3.3. Sufficient clear pavement width on the western side of the High Road to allow for safe crowd flow north and south along the pavements before an event. The desirable clear pavement width is **7m**, wider than the current provision (which varies between 2.8 and 3.3m and is considered sub-optimal).
- 8.3.4. Queuing area to access the station of **1,470m<sup>2</sup>**.
- 8.3.5. The masterplan should support the Stadium Event Local Area Management Plan, which is a requirement of the Stadium planning permission and describes the traffic and crowd management arrangements in the area surrounding the Stadium that are required to enable spectators to move safely to/from the venue on a Major Event Day. These include, *inter alia*, a Match-day Controlled Parking Zone and closure of the High Road to traffic in the immediate post-event period (30 minutes following the final whistle. Stadium Event LAMP has not yet been developed, but that the process for doing so will need to take account of the design development activity for the HRW.
- 8.3.6. Spatial allowance for security infrastructure needed to protect crowded places and spaces.
- 8.3.7. Also note that the comments made in the previous section are based on an understanding of spectator behaviour and crowd management aspirations that are under development and will continue to develop as the Stadium opening day approaches.



#### INGRESS

- 1 Pavement width capacity should consider peak ingress for all origins except WHLS - **Existing capacity**
- 2 Corridor width capacity equals combined northbound and southbound exit capacity of the station - **25m [17.5m + active frontage]**
- 3 Investigate opportunities to increase to **7m** the width of the High Road pavement
- 4 Crossing 'holding area' plus allowance for other origins further west - **295m<sup>2</sup>**

FIGURE 11 Overview of Spatial Requirements - Ingress (via WHL)



#### EGRESS

- 1 Combined flows of: destinations on foot and car parking, pubs and White Hart Lane Northbound - **Existing capacity**
- 2 White Hart Lane northbound service flow - **Existing capacity**
- 3 White Hart Lane Southbound service access route - **10m [17.5m + frontage required for ingress]**
- 4 Queue footprint - **1,175m<sup>2</sup>**
- 5 Queuing 25% 'Buffer zone' - **1,470m<sup>2</sup>**

FIGURE 12 Overview of Spatial Requirements - Egress

# 9. CONSTRUCTION PHASING

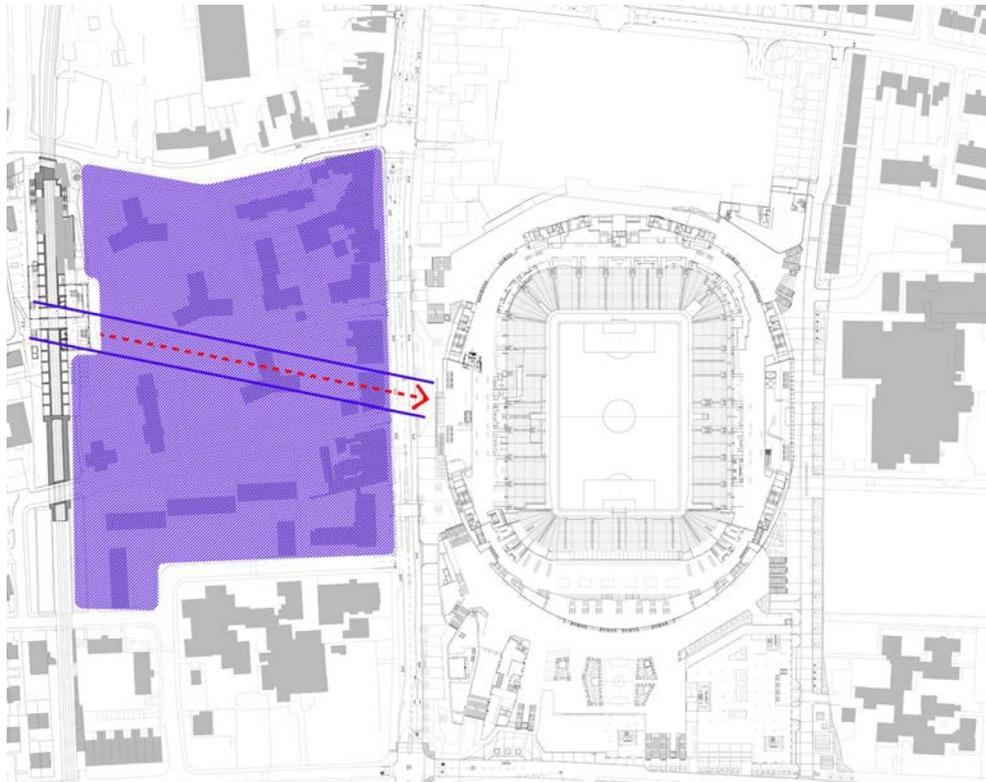


9.0.1. Note that the new Stadium is due to open in August 2018 with the station upgrade at WHLS to be operational in July 2018. It is understood that HRW will start on site at a similar time and then be delivered over 9 years. It is therefore important that the Construction Phasing works for the High Road West take into account the requirements for crowd management associated with the new stadium as stated.

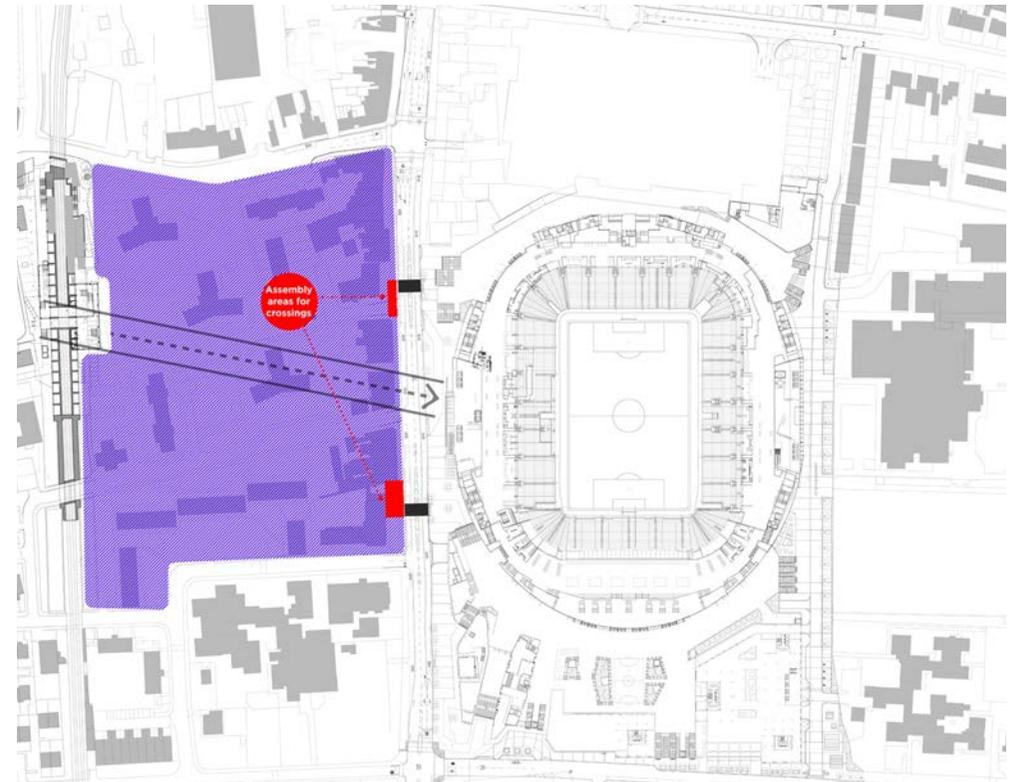
# 10. FIXED DESIGN PARAMETERS



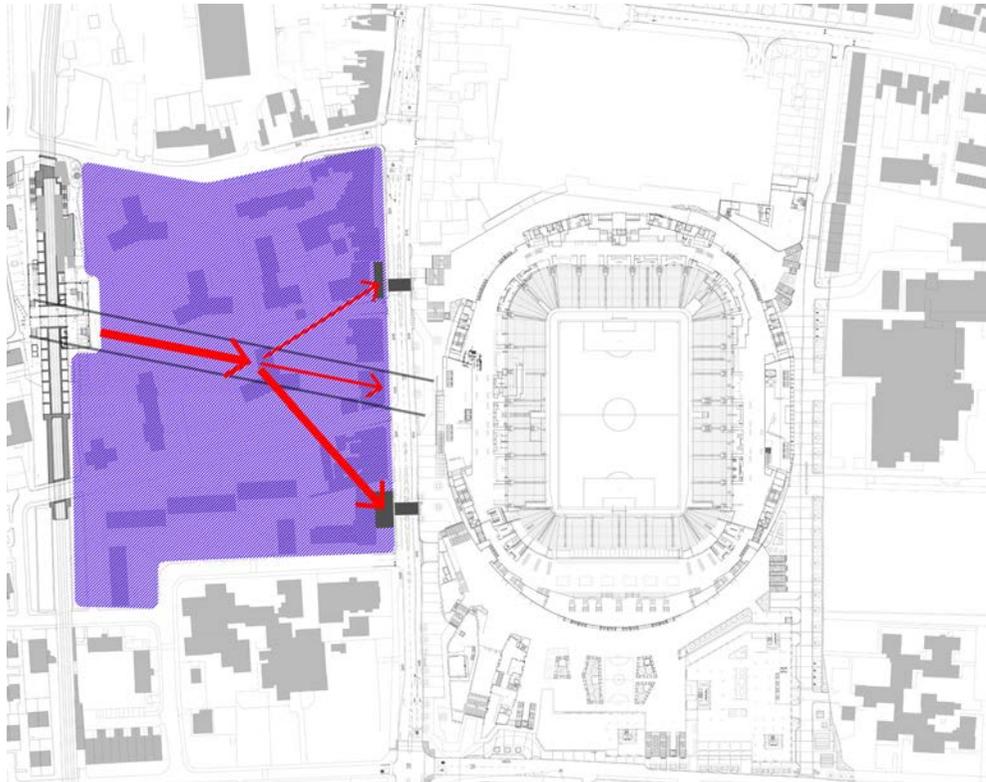
- 10.0.1. The following diagrams set out the fixed design parameters that need to be adopted to ensure that the masterplan design between the new White Hart Lane station and the Stadium provide safe and coherent circulation, as well as an appropriate setting for the Stadium itself.
- 10.0.2. The diagrams work through the sequence of crowd flow during both ingress and egress modes, which reflect the earlier text in this document and help to set out the key parameters that need to be accommodated in a future masterplan development.
- 10.0.3. The first stage is the arrival at the station and the creation of a direct line of sight and frame for the shape and design of the Stadium, which helps to draw people along the key approach route towards the Stadium and destinations beyond. The next stage is the creation of links from the key access route to the queuing areas on the High Road that serve the crossings on the High Road towards the principal access stairs to the north and south podium of the Stadium. These routes then define smaller development plots that would need to be low in scale to avoid compromising views from the Station to the Stadium. Finally there are the return routes to the station, which include appropriate queuing space in front of the station entrance, which are integrated with a new public square.



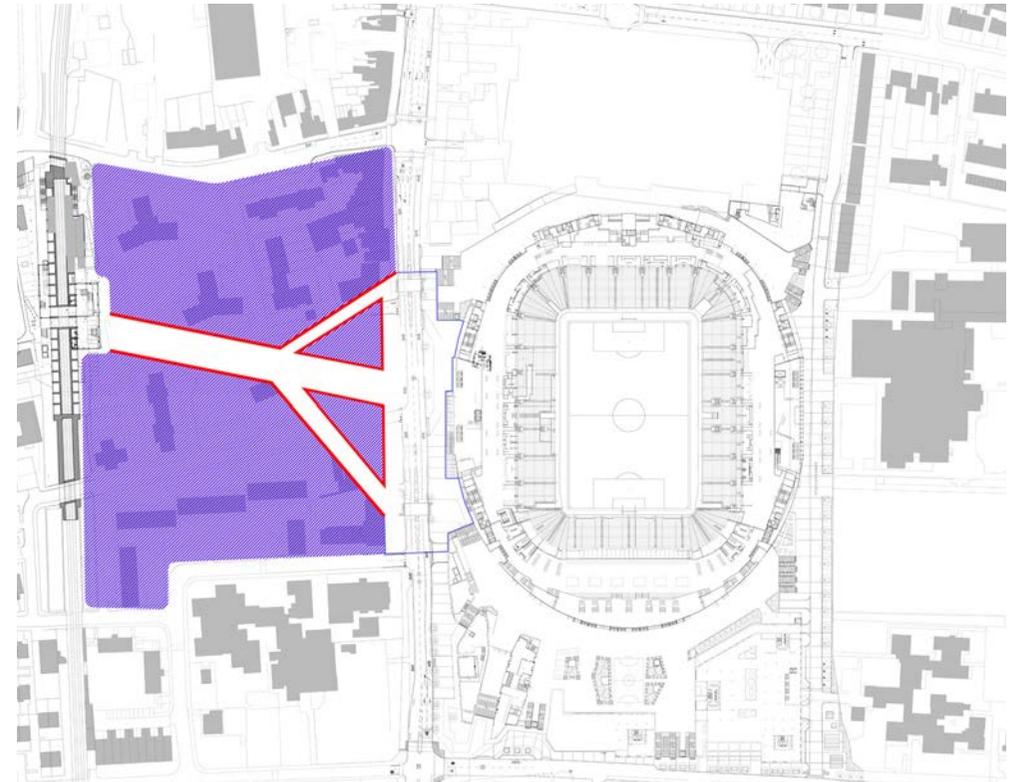
**Diagram 1:** Width of link between the Station and the Stadium - 25m.  
(17.5+allowance for active frontage 3-4m per side)



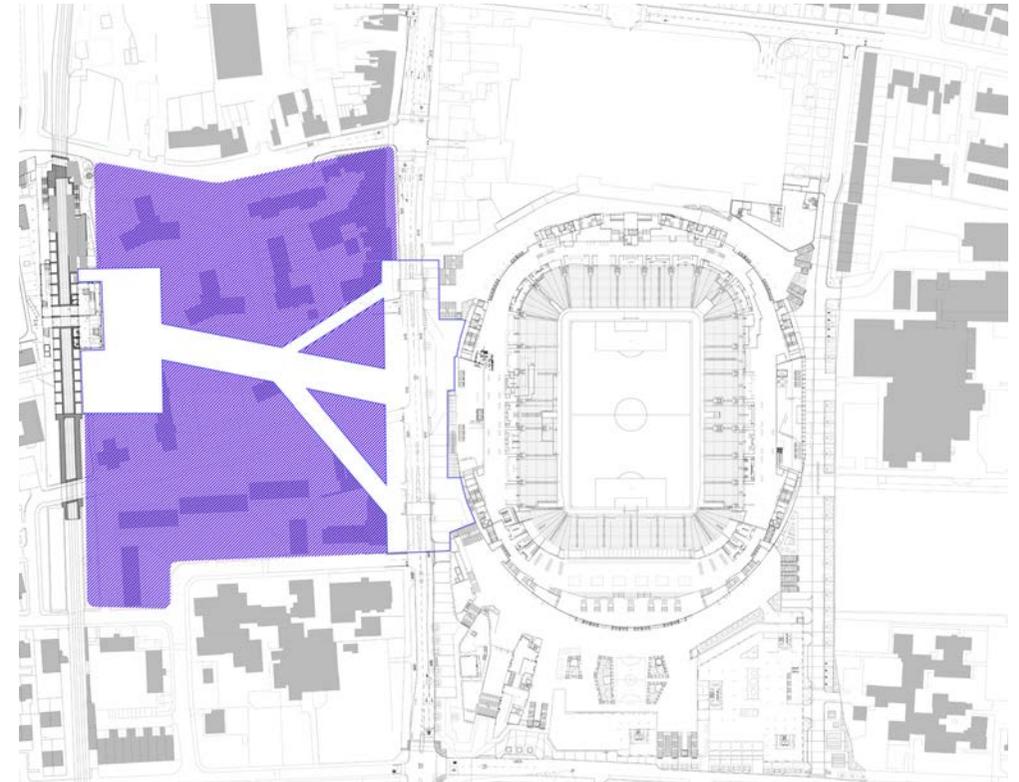
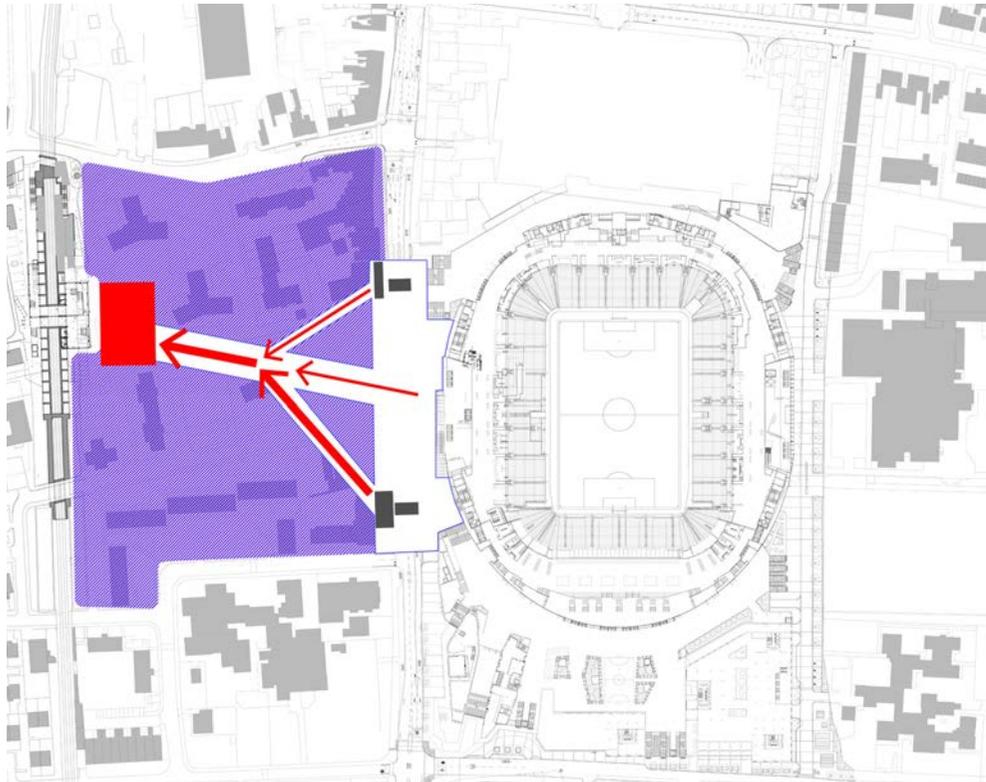
**Diagram 2:** Footprint for build-up queues for crossing of High Road.  
(295m<sup>2</sup> in worst case scenario)



**Diagram 3:** Connection to crossing points to/from Stadium.



**Diagram 4:** Public Space from link to crossing points.



**Diagram 5:** Illustrative Footprint for WHL Station Square.

(1,470m<sup>2</sup> Queuing zone for spectators leaving stadium)

**Diagram 6:** Integration of all requirements into Masterplan



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## **Appendix H**

Email to Haringey Council dated 21 October 2021

Thursday, October 5, 2023 at 14:35:24 British Summer Time

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**Subject:** High Road West/LendLease Scheme  
**Date:** Thursday, 21 October 2021 at 18:05:14 British Summer Time  
**From:** Richard Serra  
**To:** McNaugher Robbie  
**CC:** Joyce David, Harrington Graham  
**Priority:** High  
**Attachments:** image003.png, image002.png, image001.png  
Robbie

We note that the LendLease High Road West scheme is due to be reported to Planning Committee for a pre-application briefing next week. I understand that James Beynon has spoken with Graham and we have reviewed the Report to Committee. There are a few points of fact that we should raise at this stage.

First, we wanted to make you aware that THFC were not notified or saw any advance notification of the Development Management Forum referred to in paragraph 6.3 of the report. It is also not clear if this meeting was widely publicised in the usual way, e.g. site notices? We would certainly have wanted to attend the meeting and see the presentation given, particularly as we are the largest 3<sup>rd</sup> party landowner within the proposed scheme boundary (against a background of our extant consents and current applications) and also from a Stadium operation perspective. We note that many of the issues and concerns raised by the few residents that did attend related to the interrelationship between the LendLease scheme and Stadium operations.

We note that Lendlease has now submitted an application for an EIA Scoping Opinion and we understand from Graham that the Club will be consulted on that application, which we welcome.

We also want to ensure that you and members of the Committee are aware of the extent of the pre-application consultation LendLease has undertaken with the Club in respect of its proposed scheme. Paragraph 6.2 of the report gives the impression that there has been meaningful pre-application consultation with the Club and that this has fed into the Lendlease proposals. In reality whilst the Club was aware that a planning application was forthcoming, only one recent meeting has taken place with LendLease and this didn't in any way constitute a detailed briefing on the proposals. At no stage has the Club been presented with the scheme in full and been given an opportunity to provide feedback on its composition or design. The information provided in this report is the first time THFC has seen any of the detail of what may now be proposed.

In particular, there has also been no meaningful engagement on the relationship between these proposals and the operation of the Stadium, including crowd flow, event management, access, and security. You will appreciate these are very important considerations given that the proposed scheme will provide one of the main points of access to Tottenham Hotspur Stadium from White Hart Lane station. We remain open to any such engagement.

Kind regards

Richard



**Richard Serra MRICS MRTPI**  
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## **Appendix I**

Quod letter on behalf of the Club to Haringey Council dated 20 December 2021



**Your ref:** HGY/2021/3175  
**Email:** james.beynon@quod.com  
**Date:** 20 December 2021

Mr Philip Elliott  
London Borough of Haringey

For the attention of Philip Elliott  
By Email [Philip.elliott@haringey.gov.uk](mailto:Philip.elliott@haringey.gov.uk)

Dear Phillip,

**Representations to High Road West Hybrid Planning Application on behalf of Tottenham Hotspur Football Club (LPA reference HGY/2021/3175) (“the High Road West Application”)**

We are instructed by Tottenham Hotspur Football Club (“the Club” or “THFC”) and this letter represents the Club’s initial representations on the High Road West Application.

The Council will appreciate that the High Road West Application as well as the future of High Road West more generally is a matter of significant interest and importance to the Club. The Club is keen to ensure the delivery of High Road West as a scheme of the highest quality to complement its own investment in North Tottenham; and to match the longstanding Haringey policy aspiration for the area to become London’s next premier leisure destination.

The High Road West Application is proposed on, and adjacent to, land owned by the Club (including the majority of land north of White Hart Lane). It overlaps with consented and proposed development that will be brought forward by the Club and it is situated immediately opposite the Tottenham Hotspur Stadium and wider Northumberland Development Project.

Having undertaken a preliminary review of the application, the Club has a number of questions regarding the proposals and considers that further clarification, information and assessment is essential to enable it and the Local Planning Authority to properly understand the scheme. These questions mainly arise from scale of the proposals, the scope of the application and the considerable degree of flexibility sought on design and composition of the outline element.

The Club would welcome the opportunity to discuss the proposals in more detail with both the Council and the Applicant.

As discussed in conversations on 17 December 2021, the Club is continuing with its review and will submit further comments as soon as possible in the New Year.



However, there is one issue which the Club would like to raise at this stage.

One of the Club's key concerns relates to the impact of the High Road West Application on the operation of the Tottenham Hotspur Stadium on major event days – particularly with regard to crowd flows, safety and management. The Stadium currently operates pursuant to the approved Major Event Day Local Area Management Plans and Major Event Day Travel Plan (together with associated strategies). Considerable effort has gone into the preparation; approval; review; and monitoring of these documents by both the Council and the Club.

The Club understands that consultants to consider the impact of the proposals on crowd flows, safety and management were only appointed around the time the High Road West Application was submitted. From the application material it does not appear that the consultants have had a meaningful impact on the design or assessment of the proposals.

The Applicant has, post-submission of the High Road West Application, approached the Club to seek to discuss these issues. This approach is welcomed by the Club but these discussions are at a very early stage and will be progressed in the New Year, subject to the successful resolution of a conflict of interest between the Applicant's crowd flow consultants and the Club, for whom that consultant is also acting.

At this stage very little information has been provided in respect of the implications of the application proposals on event day crowd flows, safety and management both during the various construction phases and on completion of the development. This is very important as the routes between the Stadium and White Hart Lane Station and areas beyond (including the Club's shuttle bus and regional coach services) will be in a state of flux for ten years based on the proposed phasing of the scheme.

Crowd flow impacts are dealt with at only a very high level within the Transport Assessment, with Chapter 8 making brief reference to spectator flows in the completed Moselle Square. However, these are based on out-of-date forecast crowd flows prepared (almost 10 years ago) before the Stadium opened rather than actual data from the operation of the Stadium which is now available. This information is only now being sought by the Applicant and subject to resolution of the conflict of interest highlighted above, will be readily provided by the Club.

The application suggests that these issues can be addressed through some form of management plan or strategy to be secured via a planning condition or Section 106 planning obligation. The Club does not consider that such an approach is either appropriate or legally robust at this stage. The issue of crowd safety in particular is one of very great significance, which should not be underplayed.

In order for this approach to be appropriate the Applicant will need to demonstrate that the impact will, in principle, be acceptable. Based on the information currently provided with the application, the Club does not consider it is currently possible to reach that conclusion.



Further assessments should be undertaken based on the most up-to-date data and with the methodology agreed with the Club beforehand. Amongst other matters, the assessment must include an options analysis to demonstrate whether the length of disruption can be reduced and whether the final construction of the route can be completed sooner than 2032.

We can confirm that the Club is, of course, very willing to work with the Applicant to assist with the preparation of these updated assessments. The Club and its advisors would be very happy to discuss the contents of this letter further with both the Council and the Applicant more generally.

As set out above, the Club will continue with its wider review of the application material and submit its detailed representations as soon as possible in the New Year.

Yours sincerely

James Beynon  
Associate

## **Appendix J**

THFC letter to Haringey Council dated 4 March 2022

Our Ref: DW:100086.0017

4 March 2022

Mr Philip Elliott  
London Borough of Haringey

**By e-mail only:** [philip.elliott@haringey.gov.uk](mailto:philip.elliott@haringey.gov.uk)

Dear Philip

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)  
Representations on behalf of Tottenham Hotspur Football Club**

We are instructed by Tottenham Hotspur Football Club (“THFC”).

On 20 December 2021 our client’s planning consultants, Quod, submitted initial representations in respect of the High Road West Application. This letter should be read alongside Quod’s earlier representations.

**1. INTRODUCTION**

- 1.1. The future of High Road West is a matter of great importance to THFC, given its proximity to the Tottenham Hotspur Stadium, the biggest private sector employer in the area, and the fact that THFC is the largest private landowner within the application redline boundary.
- 1.2. The proposed regeneration of the High Road West area originated in discussions between THFC and the Council over 10 years ago. THFC and the Council signed two Memoranda of Understanding which set out the principles that were intended to guide the evolution and delivery of the High Road West scheme.
- 1.3. The overarching objective (which subsequently became enshrined in the adopted Tottenham Area Action Plan) was for the High Road West area to become London’s next premier leisure destination. The aim was to deliver a scheme of the very highest quality to complement THFC’s own £1bn+ investment in the Tottenham Hotspur Stadium and the wider Northumberland Development Project.
- 1.4. THFC remains supportive of, and committed to, this original vision. It is for this reason it has brought forward proposals on its own land within the High Road West Area at the Goods Yard, the Depot and the Printworks.
- 1.5. Despite THFC’s position as a key stakeholder in the area, as explicitly recognised in the Development Agreement between the applicant and the Council, the applicant

chose not to undertake any meaningful pre-application consultation with THFC prior to submission of the High Road West Application.

- 1.6. THFC has subsequently given the High Road West Application extremely detailed consideration and has sought to engage with the applicant and the Council to ensure it properly understands the scheme.
- 1.7. Having reviewed the High Road West Application carefully, THFC considers that the proposals fall a long way short of meeting the jointly held longstanding aspiration for the area and its communities. This is a matter of very real regret and disappointment for THFC, who cannot, therefore, support the application.
- 1.8. The degree of flexibility sought in both the composition of the uses within the scheme, the lack of any meaningful detailed design information, and the minimal commitment to the delivery of leisure and social infrastructure, raises fundamental concerns about what will actually be delivered.
- 1.9. In turn, the lack of certainty and commitment makes it impossible to properly assess the impacts of the application and the public benefits it will actually deliver.
- 1.10. This letter therefore represents an objection to the High Road West Application on behalf of THFC.

## **2. UPDATE ON CROWD FLOW ISSUES**

- 2.1. Following the Quod letter on 20 December, the Club has tried to engage with the applicant and the Council to attempt to understand the impact of the application on the operation of the Tottenham Hotspur Stadium.
- 2.2. In an undated letter received in January 2022, the applicant's agent DP9 submitted a response to the Quod letter, which purported to record the discussions between the Club and the applicant regarding crowd flow and management matters. THFC does not accept that DP9's response represents an accurate record of the nature of discussions that have taken place and gives the misleading impression that THFC has somehow failed to properly engage with the applicant. THFC strongly resists any such assertion.
- 2.3. The first time any technical discussion took place regarding crowd flow matters was after submission of the application. In turn the fact that the applicant only appointed specialist crowd flow consultants after submission of the application indicates the complete lack of consideration that was given to the issue in the preparation of the scheme.
- 2.4. A meeting took place on 24 January with the Council and applicant's professional team. At that meeting the applicant advised that further modelling work was ongoing and that the results of this assessment would be provided to THFC shortly thereafter.
- 2.5. On 9 February, THFC was provided with a "Crowd Flow Study Report" prepared by Buro Happold. THFC in turn was invited to a subsequent meeting on 11 February, where the applicant presented the Report.
- 2.6. THFC is reviewing the Crowd Flow Study Report with its professional advisors but this will take time. The Report fails to address a number of THFC's key concerns not least as it contains no assessment of the interim impacts during the construction phase of the High Road West scheme, and where the key route between the Stadium and

White Hart Lane station is not forecast to be completed until 2032 as the final phase of the development.

- 2.7. However, there is no guarantee that even this protracted 10 year timetable will be met, particularly if there are any other delays to the scheme, for example, due to land assembly and compulsory purchase procedures.
- 2.8. Furthermore, there is no guarantee that the final route will actually ever be delivered at all, meaning any temporary route or routes could be necessary not just for longer than the currently proposed 10-year phasing programme but potentially be in operation in perpetuity.
- 2.9. The crowd flow and management issues give rise to very real practical, financial and legal concerns for the Club and the Council. They potentially involve the need for crowd flow access and management across third party land and significant additional costs of stewarding and temporary physical infrastructure 50 times a year for over 10 years. They will undermine and jeopardise the plans and strategies that THFC and the Council (and other stakeholders) have worked extremely hard to prepare and finalise over the last 5 years.
- 2.10. The crowd flow impacts are a concern not just for THFC but for number of other stakeholders including the Metropolitan Police and transport operators. More fundamentally they are a matter of great concern for the local community.
- 2.11. Amongst other matters they engage the Council's legal duties pursuant to the Equality Act 2010 and also the Crime and Disorder Act 1998. They are not matters that can be deferred and dealt with as part of a condition or planning obligation at a later date. They require proper assessment and consideration prior to the determination of the High Road West Application.
- 2.12. The applicant and the Council cannot simply ignore the fact that the application site lies directly between a 62,000 seat Stadium and the nearest public transport hub.
- 2.13. The Crowd Flow Study Report was not included within the Environmental Assessment Addendum submitted at the end of January 2022, and subsequently publicised on 3 February 2022.
- 2.14. As set out above, the Crowd Flow Study Report is plainly a matter of importance to a number of stakeholders and the wider community as well as THFC. It clearly constitutes either "further information" or "any other information" for the purpose of Regulation 25 of the The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"). Whilst we understand the Report has now been made available on the Council's planning portal, it needs to be properly publicised and advertised in accordance with the requirements of the EIA Regulations, with the public given the prescribed amount of time to review and comment.
- 2.15. THFC will continue to engage with the applicant and will submit its detailed comments on the Crowd Flow Study Report as soon as possible.

### **3. THE COMPOSITION OF THE APPLICATION SCHEME**

- 3.1. The description of development is extremely broad and purports to seek approval for a very wide range of uses and for "the creation of a new mixed-use development"

(emphasis added). For the reasons set out below there is no actual guarantee that a large number of these uses will actually be delivered.

- 3.2. The Executive Summary of the Planning Statement explains that the aim of the application is to deliver “transformative change for Tottenham and its residents” and that the scheme has been designed to “create a vibrant and sustainable neighbourhood and support the creation of a new leisure destination for London.” As set out in the High Road West Masterplan”[sic].
- 3.3. However, when the composition of the scheme and the applicant’s actual commitment to delivery of all the potential component parts is properly understood, the High Road West Application fails to meet this objective.
- 3.4. The application seeks to reserve all matters with the exception of access points to the site. The actual design and composition of the outline phases of the application is proposed to be controlled by the Parameter Plans, the Development Specification and the Design Code. As explained below there are a number of contradictions and inconsistencies between the provisions of the Design Code and the Parameter Plans.
- 3.5. There is scope for considerable variation, in the design, composition and quantum of development, between the proposed illustrative scheme and the actual full extent of the parameters.
- 3.6. For example, in terms of height, the illustrative scheme proposes a 29 storey building within Plot D1. However, based on the actual parameter plans a 33-34 storey building could be accommodated in this location. No explanation is provided as to why flexibility for potentially an additional 5 storeys beyond the illustrative scheme is required.
- 3.7. The Development Specification sets out the minimum level of floorspace for each use that will be provided within each use class. Table 3 sets out the minimum levels of development across the whole development and Table 4 sets out the minimum floorspace for each Development Zone across the scheme. Table 5 sets out the maximum floorspace for each Development Zone.
- 3.8. Set out below are relevant examples of the total minimum and maximum floorspace proposed for certain uses, extracted from Table 3 and Table 4:

<b>Use</b>	<b>Minimum GEA (sqm)</b>	<b>Maximum GEA (sqm)</b>
Industrial B2/B8	0 sqm	8,000 sqm
Use Class E (a) to (c)	4,000 sqm	7,800 sqm
Indoor Sports and Recreation	500 sqm	4,000 sqm
Medical/Healthcare	0 sqm	1,000 sqm
Creche/Day Nursery	0 sqm	2,000 sqm
Use Class E (g)	1,525 sqm	7,200 sqm
Library/Public Halls	500 sqm	3,500 sqm
Community Halls	500 sqm	2,500 sqm
Public House	0 sqm	3,000 sqm
Energy Centre	200 sqm	1,800 sqm

- 3.9. In contrast there is an absolute commitment to a minimum of 235,000 sqm and a maximum of 280,000 sqm of residential floorspace.

- 3.10. The total minimum floorspace across all uses is 252,907sqm, the total maximum floorspace is 339,300 sqm, and the total floorspace of the illustrative scheme is 271,169 sqm. There is a difference of in excess of 86,000 sqm between the minimum and maximum parameter scheme.
- 3.11. To illustrate the significance of the scale of this difference, a development of 86,000 sqm would require an Environmental Impact Assessment as a Schedule 2 Development in its own right.
- 3.12. In turn it is important for the Council to fully appreciate that there is a 68,131 sqm difference in the quantum of development proposed between the illustrative scheme and the maximum parameters.
- 3.13. It is the maximum quantum of development that the Council would actually be authorising if it approves the application.
- 3.14. The applicant contends that this degree of flexibility is necessary given the scale of the development and the long timeframe for delivery. However, this is no justification for such an extreme difference in the overall quantum and scale of development and the lack of commitment to the meaningful delivery of leisure uses and social infrastructure.
- 3.15. In total the applicant is only proposing to commit to the delivery of 7,225 sqm of non-residential floorspace – 4000 sqm of which will fall within Use Class E(a) to (c). This equates to less than 3% of the overall quantum of floorspace based on the minimum parameters across an 8.57ha site.
- 3.16. In terms of leisure and community uses, only a bare minimum of 1500 sqm floorspace of leisure or community uses could be provided (approximately 1% of the total quantum of built development). This commitment is contrary to both the longstanding policy aspirations for the area and the promises made to residents as part of the community consultation.
- 3.17. In respect of Employment uses, Table 3 in the Development Specification provides that a minimum of 0 sqm of B2 or B8 Industrial land will be provided. This is supported by Table 4, which again does not commit to a minimum level of industrial uses in any of the Development Zones.
- 3.18. The footnote to Table 3 advises that “a minimum floorspace of 4,686 sqm GEA will be delivered as either B2, B8 or E (g i, ii or iii) consistent with the Minimum and Maximum floorspace areas for these uses”. However, this is inconsistent with the figures in Table 3 and Table 4, which (as set out above) provide no guarantee of any minimum provision of B2 or B8 uses. It is instructive that the illustrative scheme provides no such uses.
- 3.19. Furthermore, the description of development itself does not seek approval for any B2 or B8 industrial use. This is in conflict with the application documentation and, specifically the maximum and minimum level of B2/B8 uses. On its face if approved the permission will not authorise any B2/B8 uses, as such uses will be outside the authorised scope of the planning permission.
- 3.20. The applicant relies on the proposed Commercial Relocation Strategy, which asserts that efforts will be made to re-provide space for existing businesses on site. Clearly if no B2 or B8 space is actually delivered within the scheme, existing businesses within these use classes will have to move away from the area.

- 3.21. In respect of jobs, Paragraph 12.4.1.1 of the Socio-Economic Chapter of the Environmental Statement advises that the site currently provides 690 FTE jobs on-site. The sensitivity of on-site employment is assessed as High.
- 3.22. The impact of the proposals on on-site employment from the construction phase of the scheme is described as “temporary, short-term and substantial adverse”.
- 3.23. Table 14.19 sets out a purported “worst case” masterplan. However, this includes a “minimum of 3,161 sqm” of Industrial B8 floorspace. This is inconsistent with Tables 3 and 4 in the Development Specification and the fact that no B8 use will actually be authorised by the planning permission. It is not truly “worst case”.
- 3.24. Table 14.21 estimates that the development could support 392 FTE on-site jobs. However, included within this total are 45 jobs from the Industrial B8 use. On the applicant’s own figures the scheme will result in the loss of 298 jobs on-site. When the predicted jobs from the industrial B8 use are removed this loss increases to 343 jobs. The scheme will therefore result in the loss of approximately 50% of the existing jobs provided on the site.
- 3.25. In respect of healthcare effects, the scheme proposes the demolition of the existing Tottenham Health Centre GP surgery (900 sqm of floorspace). As set out above there is no commitment to any minimum level of replacement floorspace within the application. Once completed the GPs currently accommodated within the Tottenham Health Centre would not be able to service the local community.
- 3.26. The assessment of the impact on primary healthcare should account for the loss of the GPs at the Tottenham Health Centre as the Development could result in a decrease in the number of doctors in the Local Area. This would result in a higher patient to GP ratio for comparison against the HUDU recommended benchmark of 1,800 patients per GP.

### **Compliance with the TAAP and High Road West Masterplan Framework**

- 3.27. The High Road West Masterplan Framework was approved by the Council after extensive public consultation in December 2014.
- 3.28. In turn the Tottenham Area Action plan (“the TAAP”) was prepared and first consulted upon in January 2016, culminating in adoption in July 2017.
- 3.29. The TAAP lists the HRWMF under the other supporting plans and strategies that set the context for Tottenham’s regeneration.
- 3.30. The site allocation NT5 in the TAAP is follows:
- “Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential led mixed-use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.” (emphasis added).
- 3.31. The site requirements in the TAAP site allocation include requirements to:

- Provide new retail provision to enlarge the existing centre or create a new local centre;
  - Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity;
  - Increase and enhance the quality and quantity of community facilities and social infrastructure, proportionate to the population growth in the area...(emphasis added); and
  - Accord with the principles set out in the most up-to-date Council-approved Masterplan;
- 3.32. It is important to note that THFC's investment decisions in the Tottenham Hotspur Stadium and the wider Northumberland Development Project were based on this planning context and an assumption that the aspiration for a new leisure destination would be delivered.
- 3.33. None of the requirements of the TAAP are being met satisfactorily. In terms of retail uses, a minimum of 4,000 sqm is proposed. This is less than half the existing use on site (9,060 sqm). A cinema is shown within the maximum floorspace cap. However, the minimum floorspace proposed is 0sqm and one has not been shown in the illustrative scheme.
- 3.34. There is a minimum commitment to just 500sqm of Class Ed (indoor sports, recreation and fitness) uses which shows total disregard to the policy requirement to create a leisure and sports destination. The illustrative and maximum figures may be higher but there is no commitment to deliver them. In any event, both represent just 1.2% of the respective floorspace totals for the whole application scheme.
- 3.35. In terms of community uses and social infrastructure, the applicant's minimum commitments, which include 0 sqm of health facilities and 500 sqm Class F (d or e) are actually less than the existing provision on site. Table 1a of the Development Specification indicates that there is currently 900 sqm of medical floorspace on the site and 2,280 sqm of Class F community uses.
- 3.36. The Council has long promoted the Library as the feature landmark building within Moselle Square opposite the Tottenham Hotspur Stadium – yet the application only commits to a building of 500 sqm.
- 3.37. These conflicts and others also arise when the application proposals are compared with the HRWMF.
- 3.38. The relevance and importance of the HRWMF for the purpose of determining planning applications within NT5 has been confirmed by the Planning Inspector in respect of THFC's planning appeal for the Goods Yard scheme in 2019 and subsequently by the Council its decisions in respect of THFC's later applications for the Goods Yard, the Depot and the Printworks sites.
- 3.39. The HRWMF sets out requirements for social infrastructure as part of any scheme. This includes a 660 sqm health facility, a 4,300 sqm community ideas store (including a 1,800m library & a 400 sqm community centre), and a 720 sqm community sports hall.
- 3.40. Despite the fact that the High Road West Application is proposing a quantum of residential development over double that contemplated within the TAAP and HRWMF, the actual commitment to social infrastructure is significantly less than that proposed

within the HRWMF. Remarkably, for various types of community infrastructure, minimum floorspace commitments are for less than exist on site today.

- 3.41. The massing strategy within the HRWMF suggests that tall buildings should be focused north of White Hart Lane so as not to compete with the Tottenham Hotspur Stadium and associated development in the southern phase of the Northumberland Development Project. In contrast the High Road West Application proposes a series of tall buildings to the south of White Hart Lane with the tallest at Block D up to 117m AOD.
- 3.42. The High Road West Application must be determined in accordance with the requirements of NT5 of the TAAP, which requires development to accord with the most up to date masterplan. The current most up to date masterplan is the HRWMF. It is important to note that that the HRWMF attained significant weight as a material consideration because it was subject to extensive public consultation on the basis that it would form the guiding principles for the area.
- 3.43. A scheme which only commits to a combined bare minimum of 1,500 sqm of community and leisure floorspace, whilst proposing potentially 2,929 residential units across an 8.57ha site, fails to meet the fundamental aspirations and requirements of the TAAP and HRWMF.
- 3.44. THFC is concerned that the composition of the scheme and the speed with which the application has been prepared have been driven predominantly by the applicant's contractual commitments, grant funding requirements and viability issues. However, this has resulted in a rushed, ill-thought out scheme which will fail to deliver transformative change, fail to meet longstanding policy objectives and fail to live up to the promises given to the local community and wider stakeholders. The local community deserves better.
- 3.45. THFC does not consider that a scheme of such size, with only minimal commitment to non-residential uses (and in particular leisure and other social infrastructure provision) can in any way be said to be delivering a premier leisure destination for London.
- 3.46. On any analysis, the High Road West Application, which is being brought forward by the Council's own appointed development partner, largely on Council owned land, fails to achieve the Council's own primary policy objective for the area and is contrary to the principles enshrined in the TAAP and adopted High Road West Masterplan.

#### 4. **ASSESSMENT OF THE EFFECTS OF THE APPLICATION**

- 4.1. In several instances, it appears that the applicant has relied on the illustrative scheme, rather than the maximum scale of development to show more advantageous outcomes.
- 4.2. The application proposes up to 2,929 homes whereas the illustrative scheme shows 2612 homes (a 12% difference) and the latter number appears to have been the basis for several critically important calculations and assessments within the application.
- 4.3. For example, in respect of Affordable Housing viability matters, the assessment appears to have been undertaken based on the illustrative scheme, meaning the viability position is likely to have been understated.

- 4.4. In respect of housing density, the Design and Access Statement (page 90) provides a figure of 337 units per hectare, but this appears to be based on the illustrative scheme. The density figure would rise to 375 units per hectare based on the maximum number of units. The figure would be considerably higher for that part of the scheme south of White Hart Lane.
- 4.5. In turn, the Design and Access Statement (page 92) suggests that 16.2 sqm of open space per unit will be provided based on the illustrative scheme. However, this would reduce to 14.1 sqm per unit based on the maximum parameters.
- 4.6. Page 82 of the Design and Access Statement suggests that the application will provide 64.5% dual, triple or corner aspect homes – but again this is based on the illustrative scheme. It is unclear whether the maximum parameter scheme could achieve a similar level of performance.
- 4.7. Conclusions on compliance with planning policy may be very different when the maximum figures are, correctly, used as the basis for analysis – particularly given the scale of the potential difference between the illustrative scheme and the maximum parameter scheme as set out above.
- 4.8. In the February 2022 Environmental Statement Addendum, the applicant has sought to assess an interim scheme focused on the land to the south of White Hart Lane. However, no information on housing density, open space, affordable housing viability etc has been provided for this scenario. This information must be provided so that the Council can properly consider the proposals against planning policy.
- 4.9. In turn, page 92 of the Design and Access Statement seeks to compare the application with other schemes. However, the comparative figures are only given for the illustrative scheme not the full maximum parameters. In any event the proposed comparator schemes are not credible. The applicant should have compared schemes with a significant estate renewal component which are likely to have higher proportions of social housing, family sized homes and significant associated requirements for play space and social infrastructure.
- 4.10. In respect of the Environmental Impact Assessment, the Council is required to assess the “likely significant effects” of the proposed development in accordance with the EIA Regulations.
- 4.11. As set out above, one of the consequences of the degree of flexibility sought by the applicant is that there are a large number of permutations of possible developments that could come actually forward as a result of the grant of planning permission.
- 4.12. This creates an obvious problem for assessing the “likely significant effects” of the development. This cannot be resolved by simply assessing the largest possible development because, for example, the parameter plans provide large variability in location as well as scale. The interaction of different size buildings in different locations impacts on what the effects of the development will be – this is particularly relevant given the site’s location and proximity to a number of designated heritage assets.
- 4.13. In R.v Rochdale MBC Ex p. Milne (N.2) [2001] Env.L.R.22i, Sullivan LJ confirmed that it is for a local planning authority “to decide whether the difficulties and uncertainties are such that the proposed degree of flexibility is not acceptable in terms of its potential effect on the environment”.

4.14. In this case the extreme degree of flexibility sought by the applicant is too great to allow the likely significant effects to be properly assessed. There are too many potential outcomes that need to be considered, that have not been assessed in the submitted Environmental Assessment (and Addendum) – as set out above a potential variance of 86,000 sqm of total floorspace combined with considerable variance in the component land uses. It would be unlawful for the Council to approve the application on this basis in these circumstances.

## 5. ASSESSMENT OF PUBLIC BENEFITS AND MATERIAL CONSIDERATIONS

5.1. The degree of flexibility sought by the applicant is highly problematic for the Council's determination of the application and in particular for the application of the overall planning balance.

5.2. Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that the Council must determine the application in accordance with the provisions of the development plan and any other material considerations.

5.3. Failure to have regard to "any other material considerations" would be unlawful. Conversely, it would also be unlawful for the Council to have regard to any immaterial considerations.

5.4. In this case, the difficulty for the Council, given the lack of certainty within the application proposals, is in determining what are material and what are immaterial considerations.

5.5. As set out above a number of the elements of the proposed development are stated as have 0sqm minimum floorspace (this includes all B2 and B8 floorspace, medical and creche uses). If a component part of the development is not going to be delivered then it cannot be given any weight in the planning balance. There is nothing to guarantee that these uses will actually be delivered.

5.6. In respect of other uses there is a wide degree of variance between the maximum and minimum parameters. For example, in public benefit terms, there is a very considerable difference in the weight that can be attributed to a Library of 500sqm and a Library of 3,500 sqm or a Community Centre of 500 sqm and a Community Centre of 2,500 sqm.

5.7. If the Council finds that there is any harm caused by the application, it will need to decide whether that harm is outweighed by any public benefits. Depending on what harm is identified, the Council may be required to apply a specific policy or legal test or the harm might need to be considered in the overall planning balance.

5.8. When considering whether any specific harm, or the overall harm, is outweighed by the benefits of the scheme, the Council will need to consider and accurately quantify the public benefits. However, the public benefits of the application will depend upon what scheme is actually delivered. Again, the Council cannot give any weight to any aspect of the scheme that will not actually be delivered.

5.9. THFC considers that the degree of flexibility (and corresponding lack of certainty over the delivery of public benefits) is so broad that the Council is unable to lawfully discharge its duty pursuant to Section 38(6) of the 2004 Act.

## 6. ASSESSMENT OF HERITAGE IMPACTS

- 6.1. The Planning (Listed Buildings and Conservation Areas) Act 1990 (“the Listed Buildings Act”) requires “special regard” to be had to any impacts of an application for planning permission on designated heritage assets.
- 6.2. The Courts have repeatedly held that particular weight must be attached to this objective. In The Forge Field Society and others v Sevenoaks District Council [2014] EWHC 1895 (Admin) the Court ruled that the duties imposed by Section 66 and Section 72 of the Listed Buildings Act did not allow a local planning authority to treat the desirability of preserving the settings of listed buildings and the character and appearance of conservation areas as mere material considerations to which it could attach such weight as it saw fit.
- 6.3. If a local planning authority finds that a proposed development will cause harm to the setting of a listed building or to a conservation area, it must give considerable importance and weight to that harm in any subsequent balance against public benefits.
- 6.4. In this case, the quantification of the harm is not straightforward due to the large number of different developments that could ultimately be delivered by the application. If the harm cannot be properly quantified the Council cannot lawfully exercise its duties under the Listed Buildings Act. In turn, due to the uncertainty surrounding the composition of the scheme, it is equally impossible for the Council to quantify the public benefits that the scheme will deliver. The Council is therefore unable to carry out the necessary balancing exercise.

## 7. DESIGN ISSUES - DISCREPANCIES BETWEEN THE DESIGN CODE AND PARAMETER PLANS

- 7.1. As set out above, the applicant proposes that the future delivery of the development will be regulated by the parameter plans and Design Code. However, there are a number of inconsistencies and conflicts between these documents as set out below.
- 7.2. In a number of instances, the Design Code advocates mandatory lower heights than the parameter plans (see for example page 59 of the Design Code). If the provisions of the Design Code are actually mandatory there is no reason for the parameter plans to seek additional height at this outline stage.
- 7.3. The submitted HTVIA also advises that the assessment is based upon the maximum parameters and the Design Code. However, again, there are a number of inconsistencies between the maximum parameters and the supposedly mandatory requirements of the Design Code.
- 7.4. If it is proposed that the Design Code should take priority, then there is no need for the parameter plans to seek the scale of development proposed. In the alternative, if it is proposed that the parameter plans should take priority then the assessment should disregard the Design Code and be based on the maximum scale of development as authorised by the parameter plans.
- 7.5. There is considerable inconsistency in the HTVIA on the reliance placed on the Design Code. In these circumstances the parameter plans should be amended to provide for greater consistency and avoid any potential conflicts at the reserved matters stage.

7.6. Set out below are examples of the conflict between the Design Code and the Parameter Plans.

Ref	Statement	Comment
2.15 BUILDING HEIGHTS	The masterplan's massing approach is underpinned by a deliberate response to step down to the setting of the North Tottenham Conservation Area and associated listed buildings.	The figures (Fig: 25 & Fig: 26) show the tallest buildings on the south side of White Hart Lane, directly opposite the CA and The Grange, quite literally overshadowing The Grange. This statement is plainly factually incorrect and misleading.
2.15.1 (2)	The masterplan's proposed massing and heights are managed by the following principles: <ul style="list-style-type: none"> <li>Step down to the Conservation Area – buildings must generally step down from the railway towards the conservation area on High Road and Brereton Road, and <u>White Hart Lane</u>.</li> </ul>	As above. That is not what the parameter plans actually show and the statement is incompatible with what is being applied for. If the word 'generally' is used as a caveat or get-out clause to justify the cliff-like juxtaposition, then the mandatory/compulsory guidance in the Design Code is meaningless.
5.9.1	Plot G should be no taller than 3 storeys at the junction with the Grade (II) listed building (7 White Hart Lane).	The parameter being applied for is more than double this 'mandatory/compulsory guidance'. This is wholly incompatible with the Design Code. If the 3 storeys were to be treated as an actual requirement, there is no reason for the parameter plans to seek approval for double this height. This is also incompatible with what is stated at 2.15 of the Design Code.
5.10.3	Block H2 must comprise a single 2 storey volume.	As above the parameter plans seek approval for up to 3 storeys.
5.11.1	Block H3 must be a minimum of four storeys with a potential set back on the upper floor.	The Design Code does not set a maximum height, only minimum. The block is immediately behind The Grange and the CA. The parameter plans would permit a building in the region of 7 storeys. This is incompatible with what is stated at 2.15 of the Design Code.
5.11.3	Blocks I1-3, I1-2 and I1-1 must step down towards White Hart Lane and The Grange.	This mandatory requirement is in conflict with the parameter plans which seek approval for up to 4 storeys in these blocks. This is incompatible with what is stated at 2.15 of the Design Code. See View 41 in the HTVIA.
5.12.1	Block I2-1 should match the eaves line of 6A White Hart Lane and align the southern frontage of 6A White Hart Lane.	Again, the parameter plans seek authority for double this height (see Fig: 121). See also View 41 in the HTVIA.
5.18.9	Block N4-1 must step down in height from the park to the High Road comprised of at least two steps.	The parameter plans would authorise a single 7 storey block.
5.18.10	N4-2 must sit at least 1 storey lower than the lowest step of Block N4-1.	Based on the actual parameters being applied for, this would authorise a 4 storey building immediately behind the 3 storey

Ref	Statement	Comment
		listed building and there is nothing in the Design Code that would or could prevent that outcome. See View 41 in the HTVIA.

## 8. DESIGN ISSUES - THE HTVIA AND THE DESIGN QUALITY OF THE APPLICATION

8.1. THFC is extremely concerned about the design quality of the application scheme, and its impact on the wider townscape and heritage assets. For the reasons set out below THFC does not consider that the HTVIA robustly or credibly assesses the full potential impacts of the application.

8.2. In particular THFC is concerned by the absence of an even partially worked up design or other indication of potential architectural articulation.

8.3. The Executive Summary of the HTVIA states:

*“the proposed development comprises well considered, high-quality architecture, which will make a positive contribution to the surrounding townscape and contribute to the creation of a landmark which will indicate the location of the station and improve townscape legibility. Whilst the proposals do lead to some heritage impacts, they do not introduce a new influence within the setting of the existing buildings; which are already experienced in the context of taller development including the Stadium. As a consequence we identify no materially harmful impact to the significance of any heritage receptor; overall, too, and for the reasons explained here, we conclude that the visual amenity of people using the area will be improved.*

*The proposed development represents an opportunity for optimisation of brownfield land that would contribute to the wider regeneration of the area. The assessment demonstrates the proposals would give rise to significant improvements to the character, appearance and function of the area, including the connection of the main public transport node and nearby football stadium via a new public square”.*

8.4. THFC, and its professional advisors, do not consider that the assertions in these paragraphs are substantiated either by the HTVIA or the wider application documentation.

8.5. The Executive Summary goes on to state:

*“At the detailed design stage, the commitments made within the Design Code in regard to high quality design, the delivery of a landmark development, locally distinctive built form, variety in massing and height, articulation of the facade, quality materiality, creation of a distinct sense of place, permeability and high quality public realm and landscape interventions, would be delivered.*

*This would help to reduce the scale of effects identified in this assessment, however, this detailed design information is not currently available and therefore cannot be relied upon....” (emphasis added)*

8.6. The claims of ‘high-quality architecture’ and ‘positive contribution’ are not justified as nowhere within the application document is even a partially worked up design provided to form the basis of the assessment. The Design Codes provide no indication

whatsoever of how the proposed development volumes are intended to be articulated architecturally. There are only references to illustration of other realised schemes on other sites. Paragraph 8.9 of the HTVIA makes clear that the Design Code only controls “the three-dimensional qualities of the masterplan”.

- 8.7. The HTVIA does not describe the proposed architecture even in an illustrative manner. A number of the views show an illustrative volume together with the maximum parameter volumes, but the maximum parameters are so broadly drawn that the position and massing of the final design may be more visible than is assessed in the HTVIA.
- 8.8. Appendix 1 of the HTVIA sets out a series of additional views, and whilst these are crude model shots of each view, they do show a more realistic volume for each element than the maximum parameters. They show in stark reality the potential impact of authorising the scale of development provided for in the parameter plans – for example the D2 views shown the scale of development that could be provided immediately opposite the Stadium within and adjoining the Conservation Area.
- 8.9. Paragraph 2.53 of the HTVIA states that one must “accept that judgement is involved in this specialist area” and stresses the “importance of design quality”. However, as set out above in the quote from the Executive Summary, the HTVIA earlier records that design information is not yet available and cannot be relied upon. The basis of the assessment and the judgements that are made are therefore contradictory and incoherent. Findings appear to be made about design quality and this is described as important, when the same document makes clear that this cannot be relied upon at this stage.
- 8.10. Paragraph 8.4 of the HTVIA provides that “Design is important as mitigation to ensure the Proposed Development successfully delivers a high quality development in this part of Tottenham”. However, as set out above, there is nothing in either the parameter plans or the Design Code to actually inform the quality of the architectural design of the scheme. The HTVIA seemingly relies on mitigation from the quality of design but again earlier records that no such design work is yet available. The mistake of taking into account design quality permeates through the whole assessments and clouds the objectivity of the assessment to the point of making it entirely unreliable.
- 8.11. In turn paragraph 8.19 states: *“Once the detailed design is fixed it will be possible to assess more accurately how each building is appreciated from viewpoints in the surrounding townscape. The application of detailed design in terms of façade articulation, materiality and fenestration patterns can help to mitigate the visual impact of the buildings, thus reducing the magnitude of the overall effect, and even reversing the quality of the judgement where the design is of such high quality that a contrasting element is seen as a positive addition in an otherwise consistent context.”*
- 8.12. Again, this is a tacit acknowledgement that the detailed design, quality, appearance of the scheme cannot be assessed at this stage. All that can be assessed is the parameters that have been being applied for. Yet the assessment relies heavily on design quality to produce ‘beneficial’ effects.
- 8.13. Given the scale of the proposals, the lack of any clear architectural approach means that there is no basis for an informed qualitative assessment of the heritage, townscape and visual impacts of the application to be made. In this context it is impossible for the Council to properly assess the “likely significant effects” of the application in heritage and townscape terms.

8.14. In respect of Heritage impacts The Executive Summary of the HTVIA states:

*“Whilst the proposals do lead to some heritage impacts, they do not introduce a new influence within the setting of the existing buildings; which are already experienced in the context of taller development including the Stadium. As a consequence we identify no materially harmful impact to the significance of any heritage receptor;”*

8.15. This is a misleading statement which underplays the harm identified in the impact assessment. It is incompatible with the Council’s duty under Section 66 of the Listed Buildings Act and contradicts the Advice in “the Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3” under the heading “cumulative change.

8.16. The NPPF provides a series of steps that must be gone through to assess the impact of a development on the historic environment. Key to this process is ensuring that the significance of the relevant heritage assets is appropriately assessed. Unfortunately, the HTVIA fails to accord with this established principle.

8.17. The HTVIA has downgraded heritage assets of the highest significance in Table 2.2. Assets in the ‘High’ category, including grade II listed buildings, which are of national importance, are graded as medium value. This downgrading skews the Sensitivity as set out at Table 2.5 and in turn the Likely Effect on Receptor Matrix as set out at Table 2.7. The consequence is that the effects are consistently downgraded and downplayed due to a failure to acknowledge how the NPPF categorises heritage assets of the highest significance. This error pervades the assessment work carried out by the applicant. If the Council is to rely on the assessment it would fall into obvious legal error.

8.18. In turn, the statement that great weight and importance has been given to all designated heritage receptors is incompatible with the finding of harm to several heritage assets, but then stating *“we identify no materially harmful impact to the significance of any heritage receptor”*.

8.19. The Courts in *Jones v Mordue & Others* [2015] EWCA Civ 1243 have established that a decision-maker who has worked through the paragraphs of the NPPF in accordance with their terms will have complied with the statutory duty set out in the Listed Buildings Act. However, given that the HTVIA has failed to recognise the correct categorisation of heritage assets of the highest significance, it cannot be said to be in accordance with the terms of paragraph 200 of in the NPPF.

8.20. As set out in Section 6 of this letter above, the further difficulty for the Council as a result of the degree of flexibility sought by the application, is in quantifying precisely both the level of harm that will be caused to the heritage assets and the public benefits that it can be certain that the scheme will actually deliver. This exercise is essential to enable the Council to lawfully discharge its duties under the Listed Buildings Act 1990

## 9. **APPROACH TO CUMULATIVE ASSESSMENT**

9.1. The 2022 Environmental Statement Addendum purports to assess two separate scenarios. First, a scenario where the scheme south of White Hart Lane is brought forward independently. Secondly a scenario where the applicant brings forward the

development south of White Hart Lane in parallel with THFC bringing forward the extant consents for the Goods Yard and Depot sites.

- 9.2. The Addendum acknowledges that the Council has resolved to grant THFC's application for the Printworks site and has made minor amendments to the parameter plans to facilitate that scheme. However, the Printworks permission has neither been included as a committed scheme for the purpose of cumulative assessment, nor has it been included within the second scenario.
- 9.3. This is important as the Printworks scheme extends beyond the High Road West Application redline boundary and is plainly a committed scheme that must form part of the cumulative assessment and the second scenario assessed in the Environmental Statement Addendum.

## **10. CONCLUSION AND NEXT STEPS**

- 10.1. THFC remains fully supportive of the aspiration to develop the High Road West area in accordance with the longstanding objectives, now enshrined in planning policy and the adopted High Road West Masterplan, to create a premier leisure destination for London.
- 10.2. For all the reasons set out above THFC is concerned that the High Road West Application wholly fails to deliver the objectives of the TAAP and the HRWMF.
- 10.3. Furthermore, due to the extreme level of flexibility sought, and the corresponding lack of certainty on the design, scale and composition of the scheme, THFC does not consider that it is currently possible for the Council to lawfully assess and determine the High Road West Application.
- 10.4. THFC understands the applicant's desire for flexibility, but the degree sought within the High Road West Application (equating to a variance of up to 86,000 sqm of floorspace) is simply unjustified in this case.
- 10.5. THFC is firmly of the view that the applicant and the Council should pause, reflect on the representations made not just by THFC, but other stakeholders such as the Peacock Industrial Estate, Tottenham Biz, Natural England and the Environment Agency, and amend the scheme and application accordingly.
- 10.6. This process should involve a wide-ranging review of the scheme and include (but not be limited to) the following steps:
  - 10.6.1. Reviewing the composition of uses within the scheme and provide far greater certainty on the delivery on leisure uses and social infrastructure in particular (including amending the description of development to provide for B2 and B8 uses);
  - 10.6.2. Reviewing the Design Code and parameter plans to ensure consistency and reduce the maximum vertical and horizontal parameters accordingly;
  - 10.6.3. Providing more information and clarity on the design of the scheme, and the mechanisms that will be put in place to deliver high quality architecture. This will include the provision of far greater design information on the illustrative scheme (or schemes) for assessment purposes;

- 10.6.4. Providing a detailed strategy explaining how the scheme will meet the objective of delivering a new leisure destination for London;
  - 10.6.5. Reviewing and updating the HTVIA in light of the revised parameters and design information, and attributing the correct degree of significance to the identified heritage assets;
  - 10.6.6. Updating the Environmental Statement (and Addendum) to properly include the effects of the Printworks Scheme as part of the cumulative assessment;
  - 10.6.7. Properly publicising and consulting upon the Crowd Flow Study Report in accordance with the requirements of the EIA Regulations; and
  - 10.6.8. Seeking and consulting upon the additional information and clarification sought by other objectors including Natural England and the Environment Agency.
- 10.7. THFC remains very willing, as it always has been, to work with the applicant and the Council as part of this review.
- 10.8. Please would you kindly acknowledge safe receipt of this letter.

Yours sincerely



**RICHARD MAX & CO**

## **Appendix K**

Richard Max & Co. letter on behalf of THFC to Haringey Council dated 14 March 2022

Our Ref: DW:100086.0017

14 March 2022

By e-mail only: Philip.Elliott@Haringey.gov.uk

Mr Philip Elliott  
London Borough of Haringey

Dear Mr Elliott

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)**

We are instructed by Tottenham Hotspur Football Club (“THFC”). We write further to our letter 4 March 2022.

Following submission of our letter, our client was provided with an updated report entitled “High Road West Crowd Flow Study” prepared by Buro Happold (“the Crowd Flow Study”). The Crowd Flow Study was dated 3 March 2022 and was provided to our client by e-mail on 4 March 2022 timed at 17:04.

The Crowd Flow Study supersedes the earlier version dated 8 February 2022 and issued to our client by the applicant on the same day.

The Crowd Flow Study was published on the Council’s website in the week commencing 7 March 2022 but has not otherwise been advertised or formally consulted upon.

Our client and their professional advisors are reviewing the Crowd Flow Study but this requires proper time given the contents of the report and the importance of crowd flow safety issues to the Club, the Council and the wider community.

In our letter of 4 March we set out that the earlier draft of the Crowd Flow Study represented “any other information” for the purpose of the Town and Country Planning Environmental Impact Assessment Regulations 2017 (“the EIA Regulations”) and therefore it needed to be advertised and consulted upon in accordance with the prescribed requirements in Regulation 25.

On 9 March 2022, the agenda for the Council’s Planning Sub-Committee meeting on 17 March 2022 was published. The High Road West Application has been included on the agenda and an officer report published recommending approval of the application.

The officer report does not address any of the issues raised in our letter 4 March 2022 and specifically doesn’t anywhere address the status of the Crowd Flow Study and the need for further public consultation.

## The EIA Regulations

We set out the relevant legal principles below.

Regulation 25(2) states that:

“Paragraphs (3) to (11) apply in relation to further information and any other information except in so far as the further information and any other information is provided for the purposes of an inquiry or hearing held under the Act and the request for the further information made pursuant to paragraph (1) stated that it was to be provided for such purposes” (emphasis added)

Regulation 25(3) states:

“The recipient of further information pursuant to paragraph (1) or any other information must publish in a local newspaper circulating in the locality in which the land is situated a notice stating—

- (a) the name of the applicant for planning permission or subsequent consent or the appellant (as the case may be) and the name and address of the relevant planning authority;
- (b) the date on which the application was made and, if it be the case, that it has been referred to the Secretary of State for determination or is the subject of an appeal to the Secretary of State;
- (c) in the case of a subsequent application, sufficient information to enable the planning permission for the development to be identified;
- (d) the address or location and the nature of the proposed development;
- (e) that further information or any other information is available in relation to an environmental statement which has already been provided;
- (f) that a copy of the further information or any other information and of any environmental statement which relates to any application for planning permission or subsequent application may be inspected by members of the public at all reasonable hours;
- (g) an address in the locality in which the land is situated at which the further information or any other information may be inspected and the latest date on which it will be available for inspection (being a date not less than 30 days later than the date on which the notice is published);
- (h) details of a website maintained by or on behalf of the relevant planning authority on which the further information or any other information may be inspected, and the latest date on which they will be available for access (being a date not less than 30 days later than the date on which the notice is published);
- (i) an address (whether or not the same as that given pursuant to sub-paragraph (g)) in the locality in which the land is situated at which copies of the further information or any other information may be obtained;
- (j) that copies may be obtained there so long as stocks last;
- (k) if a charge is to be made for a copy, the amount of the charge;
- (l) that any person wishing to make representations about the further information or any other information should make them in writing, before the latest date specified in accordance with sub-paragraph (g) or (h), to the relevant planning authority, the Secretary of State or the inspector (as the case may be); and
- (m) the address to which representations should be sent.” (emphasis added)

Regulation 25(7) provides that where “any other information” is provided, the local planning authority “must suspend determination of the application” and “must not determine it in before the expiry of 30 days after the last of the publication requirements has been complied with.”

Regulation 2 defines “any other information” as

“any other substantive information relating to the environmental statement and provided by the applicant or the appellant as the case may be”

Regulation 18(3)(b) provides that an environmental statement is a statement which includes at least “a description of the likely significant effects of the proposed development on the environment”.

In turn Regulation 18(4)(b) provides that an environmental statement must “include the information reasonably required for reaching a reasoned conclusion on the significant effects of the development on the environment”.

### **The Environmental Statement**

The applicant submitted a request for a Scoping Opinion which acknowledges that the “likely significant effects of the development” include:

- The effect upon pedestrian and cyclist access (delay, amenity and intimidation);  
and
- The effect on pedestrian cycling facilities and permeability through the site with improved pedestrian/cycle access through the site.

Paragraph 6.1.7 of the submitted Environmental Statement states:

“The development of plots within Phase 1B, 2 & 3 will in particular need detailed reviews with both THFC and the Met Police in terms of crowd management, crowd flow and public safety and security. This will likely involve THFC’s Blue Book (Operational Guide to Event Days)”

In turn paragraph 15.4.1.7 of the submitted Environmental Statement states:

“It is acknowledged that demolition and construction operations will have a temporary impact upon event day crowd flow operations to/from the THFC Stadium. Spectator connections to/from White Hart Lane Station may be temporarily diverted during phases of works, albeit managed through the Outline CEMP and agreement with local stakeholders.”

Paragraph 15.4.2.8 states:

“In regard to crowd flow and event operations at THFC Stadium, the Proposed Development will deliver a direct pedestrian connection and sufficient queuing capacity to/from White Hart Lane Station responding to the key desire line between the Stadium and Station. The likely effect on receptors (pedestrians, cyclists - medium sensitivity) is expected to be a permanent, direct, long term, local effect of minor beneficial significance.”

The Crowd Flow study purports to assess how crowd flows through the application site can be accommodated and contains detailed modelling to assess the capacity through the site and in respect of queues at White Hart Lane Station.

The following conclusions can be drawn:

- i. The applicant has acknowledged that the effect of pedestrian access through the site is a “likely significant effect” of the application scheme;

- ii. In accordance with Regulation 18(4)(b), the Environmental Statement must contain all the information reasonably required for the Council to reach a conclusion on the significant effects – this is a mandatory requirement;
- iii. The Crowd Flow Study plainly represents “substantive information” relating to a significant effect identified by the applicant and relating to the Environmental Statement – it therefore constitutes “any other information” for the purpose of the EIA Regulations;
- iv. As “any other information” the Council must comply with the requirements of Regulation 25(3) – this is a mandatory requirement
- v. In turn the Council must suspend determination of the application and must not determine it before the expiry of 30 days following compliance with the prescribed publicity and notification requirements in Regulation 25(3) – this is a mandatory requirement.

The Council has not yet complied with these mandatory requirements and will not have time to do so before the Planning Sub-Committee meeting on 17 March. The determination of the High Road West Application at that meeting would therefore be unlawful.

As set out above the Crowd Flow Study is a matter of great importance to the Club and other stakeholders. The Club and other parties, need proper time to review and respond to it. Given the technical nature of the study we would have thought it obvious that making it available on 4 March does not provide sufficient time for any interested parties to consider it and provide full comments in advance of 17 March.

Please would you confirm by return that the determination of the High Road West Application will be removed from the Planning Sub-Committee agenda for the meeting on 17 March and that the Crowd Flow Study will be formally publicised and consulted upon in accordance with the mandatory requirements of the EIA Regulations.

Yours sincerely



**RICHARD MAX & CO**

## **Appendix L**

Richard Max & Co. letter on behalf of THFC to Haringey Council 16 March 2022

Our Ref: DW:100086.0017

16 March 2022

By e-mail only: Philip.Elliott@Haringey.gov.uk

Mr Philip Elliott  
London Borough of Haringey

Dear Mr Elliott

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)**

We are instructed by Tottenham Hotspur Football Club (“THFC”). We write further to our letters dated 4 and 14 March 2022 and in response to the Officer’s Report to the 17 March 2022 Planning Sub-Committee (“the OR”).

We note that we have not yet received a response to the issues raised in our letter of 14 March regarding the failure of the Council to comply with the requirements of the Town and Country Planning Environmental Impact Assessment Regulations 2017.

The OR (including Appendix 3 and others subsequent updates) has failed to properly and fairly set out all the issues within THFC’s representations for members’ consideration and has failed to address the fundamental concerns raised. Furthermore, the reasoning in the OR perfectly illustrates the concerns which THFC and others have expressed in relation to the High Road West Application in respect of crowd flow safety, the assessment of the impact of the proposals in heritage terms, and numerous other material issues.

The concerns we have previously raised are not simply ones of planning judgment but matters of law. If the Council proceeds to determine the High Road West Application on the basis of the OR as currently drafted it will have fallen into legal error. The only way to avoid this is for the Council to withdraw the High Road West Application from consideration by the Planning Sub-Committee on 17<sup>th</sup> March, to properly consult upon the Crowd Flow Study, to allow our client (and other interested parties) time to properly consider the crowd flow information and for the Council to then respond to the numerous issues THFC have raised.

**1. Crowd Flow & Safety**

The very late provision of the Crowd Flow Study has meant that THFC, and other stakeholders including the emergency services, have been provided with very little time to properly consider the impact of the High Road West Application on the operation of the Tottenham Hotspur Stadium and in particular, the management of crowd flows associated with major events. As set out in our 14 March letter this is completely unsatisfactory given the importance of the issues, procedurally flawed and unlawful.

Criticism is made in the applicant's response to THFC's representations, that the THFC has not been willing to engage with the applicant or the Council on this matter. This is factually incorrect and wholly misleading. For completeness we would make the following points clear:

- THFC provided the Council with clear guidance on crowd flow requirements on 19 July 2016 to pass on to HRW bidding parties, which included the Applicant;
- The Applicant did not undertake nor seek to undertake any pre-application consultation with THFC regarding crowd flow issues;
- The Applicant did not provide any crowd flow modelling or assessment within the original High Road West Application documentation;
- THFC understands that the Applicant did not commission any analysis from consultants until a matter of days before the HRW Application was submitted<sup>1</sup>;
- The first meeting took place on 29 November 2021 in response to THFC expressing its written concern that the Applicant had not consulted with it in respect of crowd flow issues;
- THFC submitted an initial holding representation highlighting the lack of any detailed crowd flow assessment on 20 December 2021 within the original consultation period on the application;
- A further meeting was held on 24 January 2022 with the Applicant but no formal crowd flow information or assessment was presented at either meeting. At the meeting on 24 January the Applicant advised that detailed information was to be provided in due course;
- The initial draft of the Crowd Flow Study was only provided to THFC on 8 February 2022 – a week later than the start of the re-consultation on the amendments to the application;
- The final complete Crowd Flow Study was only provided to THFC on 4 March 2022 – only three working days before the OR was published;
- The Council's independent review of the Crowd Flow Study, prepared by Dr Dickie was only published on 9 March and refers to other documents prepared for or by the applicant which have only been made available earlier today and which, quite understandably, THFC has not yet had the opportunity to review.

The OR dedicates just two paragraphs to crowd flow matters (9.27 and 9.28) where members are advised that any issues arising in respect of crowd flow safety can be secured by planning condition (albeit no such draft condition is set out for consideration). The OR fails to properly and fairly explain to members the real significance of the issue, the safety risks involved and the actual advice given to the Council by its own consultant, Dr Dickie.

In the limited time available THFC has commissioned its own advisors to review and comment upon the Crow Flow Study. We now attach as **Appendix 1** an initial response from Movement Strategies on behalf of THFC.

Movement Strategies identify a number of errors and omissions in the Crowd Flow Study and highlight a number of concerns including:

- The proposals will increase the crowd safety risk by introducing conflicting flows at the key junction of White Hart Lane and the High Road the road is constricted by counter-terrorism equipment.

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<sup>1</sup> Email correspondence to Planning Officers from THFC, dated 21 October, flagged that there had been no engagement on the operation of the Stadium including crowd flow etc. and that there had been no meaningful engagement with the Club on the composition of the proposals whatsoever.

- The Crowd Flow Study has failed to properly reference and consider the information provided to the Council by THFC (prepared by Movement Strategies) to inform the procurement process in July 2016.
- The Crowd Flow Study does not sufficiently address all the demand scenarios that may reasonably be anticipated to occur on an event day, and therefore cannot conclude that the masterplan design is adequate.
- The Crowd Flow Study does not adequately address the event day crowd management requirements and the impact that the design proposals will have on wider Zone Ex crowd safety and operational flexibility.
- The crowd and queuing analysis presented in the document cannot be sufficiently sense-checked based on the content of the document alone, so it is not possible to verify the outcomes and resultant conclusions.
- There has been inadequate consideration of egress patterns for all event types, particularly concerts and other events with a “hard finish”.
- There has been inadequate consideration of the interim construction phase (over 10 years), which would affect the running of some 500 major events.
- There has been inadequate consideration of the impact of unplanned disruptions on the rail network, or other emergencies or incidents.
- The study makes no reference or assessment of the needs of those with mobility impairments (we note that neither the Crowd Flow Study nor the OR has considered this issue in the context of the Public Sector Equality Duty).
- The input assumptions are based on the 2015 Transport Assessment before the Stadium was opened – using actual recorded data associated with the new Stadium would be a more sound basis of assessment.
- No justification has been provided for the choice of flow rates and queuing density parameters.

Movement Strategies conclude that the Crowd Flow Study does not provide sufficient confidence that safe and efficient crowd flow operations can be provided both during the 10 year construction period and also in the permanent “end state”.

No information is provided within the Crowd Flow Study on the interaction between the proposals and the Major Event Day Local Area Management Plan that was agreed following extensive discussions between THFC, the Council and other stakeholders.

By way of one example to illustrate the lack of understanding underpinning the Crowd Flow Study, we would comment on the proposed removal of the northbound queue and entrance point to White Hart Lane Station on White Hart Lane. It is proposed that spectators will circulate on the Stadium North Podium and walk to and through Moselle Square to the northbound queue. There is inadequate footway to accommodate southbound pedestrians in this location and the proposals are simply incompatible with the current Hostile Vehicle Management Line in crowd safety terms.

The interaction between the High Road West Application and the current crowd flow operations associated with the Tottenham Hotspur Stadium give rise to very real practical, legal and financial considerations that have not been considered by officers in the OR.

There have been no discussions with the Applicant over basic issues such as legal rights of access across third party land, responsibility for additional barriers and stewarding or construction hoarding standards and maintenance.

As highlighted by Movement Strategies, the ultimate risk to THFC in the event that the applicant’s proposals do not work, is that the Tottenham Hotspur Stadium licence will be revoked or for example the capacity of the Stadium is reduced. In such circumstances, THFC would take advice on whether it would have an actionable claim against the Applicant

and the Council. Nowhere within the Crowd Flow Study or the OR is this risk acknowledged. In turn, no indication is provided in either document of any proposals to indemnify THFC in such circumstances or otherwise make any financial contribution towards any increased costs of crowd flow management as a result of the High Road West Application.

THFC also understands that its concerns regarding the failure to undertake proper consultation on the proposals are likewise shared by the Council's Head of Building Control in his capacity as chair of the Tottenham Hotspur Stadium Safety Advisory Group. THFC wrote to Mr McIver to set out its concerns and understands that he has recommended to officers that an emergency meeting of the SAG (involving all relevant stakeholder members) should take place to consider the Crowd Flow Study before the Council (in its capacity as local planning authority) determines the High Road West Application. This advice has been ignored.

This advice from the Council's own Head of Building Control is plainly a material consideration and needs to be made clear to members of the Planning Sub-Committee. It also illustrates the importance of the Council properly publicising and consulting upon the Crowd Flow Study in accordance with the requirements of the EIA Regulations.

In turn, the cursory treatment of crowd flow safety issues in the OR does not fully and fairly properly set out for members the actual advice given by the Council's own consultant Dr Dickie. It is clear that he shares many of the concerns raised by Movement Strategies.

In particular he makes three key conclusions that have not been accurately reported to members:

- a. The Crowd Flow Study has not been based on the correct data and in particular the Study has not been based on the provision of adequate queuing space values.
- b. The proposed strategy would not work in events involving a hard finish – such as concerts.
- c. The temporary arrangements during the construction period would not provide safe and effective management of pedestrian flows on event days – and that the proposal needs to be revisited using confirmed queuing numbers. (our emphasis)

None of these three conclusions have been made clear to members in the OR. In particular, the inadequacy of the temporary arrangements is extremely important given the predicted 10 year construction period. Over 10 years it is not unreasonable to assume that over 500 full capacity events could take place at the stadium, equating to 500 million spectator movements through this space. Dr Dickie's clear advice is that the current proposals would not provide safe or effective operations for all these events.

The OR also fails to address relevant planning policy requirements relating to pedestrian movements and crowd flows. Policy GG1 of the London Plan (Building strong and inclusive communities) requires streets and public spaces to be consistently planned for people to move around and spend time in comfort and safety... At this stage, it is not possible to determine whether crowd flows will allow this to take place. Similarly, no consideration has been given to Policy D11 (Safety, Security and resilience to emergency) of the London Plan, which requires safety aspects of design to be considered at the start of the design process, i.e. not deferred to a later date.

The approach adopted by the Council at paragraph 9.28 of the OR is unlawful as it seeks to leave to conditions a matter that is integral to the principle of development. First as set out above, paragraph 9.28 does not fully or accurately record the extent of the Council own crowd flow expert. Secondly 9.28 of the OR explicitly records further assessment is required:

“ The Study has been reviewed by the Council’s independent crowd flow expert who has found that further assessment needs to be undertaken to support the suggestion that both northbound platform and southbound platform queues can be accommodated within the proposed Moselle Square” (our emphasis)

The Council are required to determine these issues now. They cannot be left to a condition (the drafting of which has not yet been made publicly available) as it is unknown whether what the condition would be seeking to achieve is possible.

This is exactly the legal error that the Court of Appeal identified in R. (on the application of Hillingdon LBC) v Secretary of State for Transport [2021] P.T.S.R. 113. In that case the court were concerned with a condition that meant the original approval was valid only after investigations as to the archaeological impact of the works on the site were undertaken and if those investigations did not discover anything of archaeological significance. At [89] of the decision Lindblom LJ found that such a condition was legally flawed:

*“89. In our judgment, applying the test set out above, such a condition would fall foul of the second and third basic requirements: (i) the condition is integral to the validity of the approval which is intended to confer a permit to conduct the development works, but at the time the condition is imposed the authority does not know whether the development works are to be " permitted " and therefore it cannot fairly and reasonably relate to it (second basic requirement); and (ii) it is irrational and unreasonable for an authority to be compelled to give what is intended to be a definitive approval to a request but also subject it to a condition that requires the authority to consider later whether the approval should have been granted in the first place (third basic requirement).”*

Here, the suggestion in the OR is that a condition can be imposed which will seek further work to ascertain whether there are crowd flow issues, if that condition reveals that there are crowd flows issues then the permission would not be implementable. Such a condition would be unlawful for precisely the same reasons given in Hillingdon LBC.

The Council cannot proceed to grant planning permission until it is satisfied that it is in principle possible to address crowd flow issues and provide safe and effective crowd flow operations both during the 10 year construction phase and also in the end state. In light of the issues raised by Movement Strategies, the Council’s own expert Dr Dickie and the position of the Council’s Head of Building Control (and chair of the Stadium Safety Advisory Group), the Council is plainly not in a position to reach that conclusion.

## **2. Heritage impacts**

The OR and the internal consultation response from the Conservation Officer illustrate very clearly why too much flexibility is proposed within the High Road West Application and highlight a number of inconsistencies in the way the application has been assessed.

**Appendix 2** comprises a review of heritage aspects of the OR. Committee members should be aware that:

1. The OR does not accurately set out the several areas where the Conservation Officer does not agree with the Applicant’s assessment.
2. The OR completely omits any analysis or consideration of several heritage assets, including 9 locally listed buildings.

3. There are fundamental inconsistencies in the analysis between the OR and the Conservation Officer. Some heritage assets are assessed by the OR which the Conservation Officer did not assess at all. Some assessments differ.
4. Not once does the OR communicate the “*overwhelming impact*” on heritage assets identified by the Conservation Officer, or the several concerns regarding the maximum parameters.
5. It is not at all clear whether the OR assesses the maximum parameters or the illustrative scheme.

Because the officers drafting the OR have ignored several heritage assets and taken a different view to the Conservation Officer in places, it is impossible for the Committee to properly understand the degree of harm as required by statute and policy.

The Conservation Officer’s comments appear to conclude that there would be harm at the “mid range” of “less than substantial”. However, from the preceding paragraph it appears that this assessment is based on the illustrative scheme rather than maximum parameters (about which she had previously expressed strong concerns).

The NPPF (para. 203) requires a balanced judgement having regard to the scale and any harm to the significance of the heritage asset. “Great weight” must be given to any harm to designated assets however, a clear understanding of the degree of harm and public benefits (see below) are not at all clear from the OR.

**Appendix 3** comprises an audit of the consultation response from the Conservation Officer. It highlights several fundamental errors in the judgements made and associated conclusions. This is perhaps not surprising, given the various inconsistencies between the application documents (including parameter plans and design codes) and the very significant variation between the illustrative scheme and proposed parameters. The following are of particular concern:

1. Reference to illustrative parameters which suggests confusion about what is being sought for approval and a reliance on the illustrative scheme rather than the maximum parameters.
2. An indication from the Conservation Officer that the inconsistencies between the parameters and design codes mean that it is very difficult to assess harm.
3. Significant inconsistencies in the approach taken compared to THFCs Goods Yard and Depot proposals.
4. Omissions of analysis on some key heritage assets including the Grade II\* Dial House.
5. A conclusion of “*the mid-range of ‘less than substantial’*” in the illustrative “*most heritage-sympathetic configuration*”. No assessment has been provided of the worst-case maximum parameters and, based on the officer’s advice, it is impossible to tell what this would be.

We repeat the points made in our letter of 4 March which the OR has simply failed to address.

In light of the confusion in the OR and Conservation Officer's comments. We also now attach as **Appendix 4** a series of illustrations and showing views not included within the applicant's assessment and to demonstrate the potential difference in the scale of development between the illustrative scheme and the maximum parameters.

In respect of the public benefits put forward to weigh in the balance against the identified harm, we note that the summary set out at paragraph 13.51 of the OR is different to the summary reasons given in the opening section of the OR. In turn the OR does not accurately or fairly qualitatively or quantitatively assess these benefits for members.

For example, reference is made to "Delivery of a new library and learning centre" – but no reference is made to the fact that the applicant has only committed to a 500 sqm building (significantly smaller than contemplated in the adopted Masterplan). As set out in our earlier letter there is a significant difference in the weight that can be given to a 500 sqm building as opposed to a 3,500 sqm building.

In turn in respect of jobs paragraph 13.51 puts forward as a public benefit the "creation of 374 FTE jobs on-site, once complete". It is not explained to members that this actually represents a significant loss of existing jobs on site nor that the numbers are based on an inaccurate assessment of the worst case scenario as set out in our earlier letter.

The OR also includes generic unquantified "benefits" such as bio-diversity enhancements (a policy requirement), the development of local supply chains and the delivery of a high quality development. No guidance is given to members on the actual specific benefit that will be provided above and beyond normal necessary policy compliance.

The treatment of heritage matters in the OR gives rise to a number of additional legal errors to those already highlighted in our letter of 4 March. The inconsistency of approach between the assessment of the application and that taken to the THFC's Goods Yard and Depot principles offends the principle of consistency of decision making which constitutes a public law error; see for example *Fox Strategic Land and Property Ltd. v Secretary of State for Communities and Local Government* [2013] 1 P. & C.R. 6.

In turn the failure to accurately reflect the opinion of the Conservation Officer in the OR or provide reasons for departing from their opinion has the effect of significantly misleading the committee which legally flaws the OR; see for example *R v Selby DC ex parte Oxtou Farms* [1997] 4 WLUK 278.

### **3. Other matters**

Only a cursory response has been provided by officers in respect of the matters raised in Appendix 3 of the OR to our letter of 4 March. No response has been provided on Design Matters (Section 6 of our 4 March letter) and officers have failed to properly grasp the legitimate serious concerns which were expressed. We respond to a number of specific matters not addressed below and this is by no means an exhaustive list.

Before doing so it is important to reiterate two key points of principle from our 4 March letter. First, we highlighted that the amount of flexibility sought by the applicant would make it extremely difficult for the Council to form a meaningful assessment on the impacts of the scheme. This concern has been proven to be well-founded by the OR. There is no consistency throughout the OR as to what level/nature/mix of development would be acceptable. The consequence of this is that the OR recommends approval of a scheme which is legally capable of delivering something entirely different to what has been (or may have been) deemed to be acceptable. This constitutes a legal error as the OR simultaneously has regard to immaterial considerations, fails to have regard to material

considerations and does not provide sufficient reasoning for why the Application is found to be acceptable.

Secondly, the OR has fallen into the legal error highlighted in *R. v Rochdale MBC Ex p. Milne (No.2)* [2001] Env. L.R. 22. The flexibility sought in the application is too great to allow the likely significant effects to be properly assessed, there are simply too many potential outcomes that need to be considered and have not been. The result is that the OR has failed to properly consider the likely significant effects of the Application.

#### *Lack of certainty and commitment making it impossible to properly assess the impacts*

In response to THFC's concerns about the lack of commitments to community facilities, officers have responded by saying the ES has considered a "worst case". However, the OR has not properly acknowledged that it cannot count anything more than the minimums proposed in weighing the overall planning and heritage balance. Page 2 of the OR refers to a huge range of between 7,225 sqm and 36,300 sqm of community and employment floorspace and cites the illustrative scheme delivering 17,600 sqm of community and employment floorspace. At the reserved matters stage, the Council will have no means of making the Applicant provide any more than the minimums and therefore that is what must be assessed and included in the planning balance. This has not been made clear to members of the Planning Sub-Committee.

Reference is made to health facilities provided alongside THFC stadium in Appendix 3 of the OR. However, this was provided as part of those proposals and in response to demand in the Northumberland Park area. No assessment has been undertaken in the Applicant's Environmental Statement in respect of whether that scheme is capable of meeting the health care needs for existing and future residents. Indeed, paragraph 14.7.29 of the applicants ES assumes that there is capacity rather than actually assessing it as follows:

*'However, as outlined above the Cumulative Schemes will see the delivery of a new healthcare centre. It is therefore assumed that the increase in demand generated by the Proposed Development and Cumulative schemes can be accommodated within this new practice. On this basis, the overall magnitude of impact on the receptor is therefore assessed as negligible.' [Emphasis Added]*

#### *Composition of the Application scheme*

As highlighted in our 4 March letter, the absence of any B2 and B8 floorspace in the scheme shows how little the applicant is committed to providing replacement accommodation for existing businesses on site. In the absence of B2 and B8 floorspace being listed in the description of development itself, planning permission would not be granted for these uses. We note that the Applicant has sought to amend the parameter plans to refer to these uses. However, without a revised description of development (which requires full re-consultation of the whole application), it is not possible for the Council to grant permission for these employment uses. Again, this needs to be made clear to members of the Planning Sub-Committee.

The OR at paragraphs 7.35 and 7.36 has regard to the provision of B2 and B8 floorspace as part of its reasoning for finding that the Application complies with the NT5 allocation and HRWMF. This is a clear legal error. If the policy compliance of the High Road West Application is dependent on the delivery of B2 and B8 floorspace then that floorspace must be deliverable. However, it is not as it is not included in the description of development and so could not be developed under any planning permission granted on the Application.

The importance of the description of development and the distinction between it and the conditions attached to it was succinctly stated by Hickinbottom J (as he then was) in Cotswold Grange County Park LLP v Secretary of State for Communities and Local Government [2014] EWHC 1138 (Admin), [2014] JPL 981 at [15]:

*"... the grant identifies what can be done—what is permitted—so far as use of land is concerned; whereas conditions identify what cannot be done—what is forbidden."*

The High Road West Application currently before the Council cannot grant permission for B2 or B8 use. Further, by relying on the provision of such uses in determining the High Road West Application the Council will have fallen into legal error by having regard to an immaterial consideration.

#### *Compliance with the TAAP & HRWMF*

We note that the conclusions of the OR (paragraph 30.1) acknowledge at least seven areas where there is non-compliance with the HRWMF but there is no preceding analysis to explain the degree of non-compliance and the justification for such departures.

Critically, there is no proper consideration of compliance with allocation NT5 of the Tottenham Area Action Plan in the OR, which forms part of the statutory development plan. Paragraph 3.27 onwards of our 4 March letter noted several areas of non-compliance including how the proposals do not include a new leisure destination for London, nor increase the quality and quantity of community facilities proportionate to population growth. The Council's response to THFC's consultation response also ignores these important omissions.

#### *Assessment of the effects of the application*

Similarly, officers have failed to respond to concerns in respect of the reliance on the illustrative scheme to assess housing density and open space requirements.

Indeed, the Committee Report appears to have factual errors in respect of housing density. Paragraph 7.42 and 30.6 of the OR reports a stated density figure of 341.7 U/Ha. However, this appears to be based on the gross site area (i.e. 2,929 units / 8.57 ha), and not the net site area, apparently ignoring the ratio of residential to any non-residential floorspace. This appears inconsistent with how the density of the illustrative scheme is described in the applicants Design and Access Statement; a figure of 337 U/Ha that is reported in paragraph 7.42 of the committee report. THFC calculate that the overall site density could be a much higher as set out in paragraph 4.4 of our 4 March letter.

#### **4. Conclusion**

The OR has failed to address the fundamental concerns raised in THFCs objection letters. Indeed, the reasoning in the OR exemplifies the concerns which THFC and others have expressed in relation to crowd flow safety, the unacceptable degree of flexibility sought (and related heritage and other concerns) and other material issues.

Again, we would urge you to confirm by return that the determination of the High Road West Application will be removed from the Planning Sub-Committee agenda for the meeting on 17 March and that the Crowd Flow Study will be formally publicised and consulted upon in accordance with the mandatory requirements of the EIA Regulations.

Yours sincerely

A handwritten signature in black ink, appearing to read "Richard Max". The signature is written in a cursive, slightly slanted style.

**RICHARD MAX & CO**

## 1. Summary

- 1.1 Movement Strategies has undertaken a review of the **High Road West Crowd Flow Study** prepared by Buro Happold for Lendlease (4<sup>th</sup> March 2022) on behalf of Tottenham Hotspur FC (THFC). This note sets out a series of findings from the review, but three key findings have been highlighted here:
1. The Crowd Flow Study is based on a plan that directs egressing spectators for Northbound rail services via Moselle Square instead of White Hart Lane. This would introduce conflicting flows at the junction of White Hart Lane and the High Road in the vicinity of the temporary HVM barrier, and is not acknowledged in the study report. **This increases the crowd safety risk at this key location, and requires further discussion and justification given THFC's Zone Ex responsibilities.**
  2. In 2016, THFC supplied a briefing note (drafted by Movement Strategies) on event day crowd movement requirements as part of the High Road West Masterplan procurement process. **This information is not referenced in the Crowd Flow Study and as such there is no attempt to describe why the proposals deviate from this.**
  3. There are a number of clear examples where the Crowd Flow Study has either provided limited detail or remains silent on key aspects associated with event day demand, capacity or operations. Our concerns are aligned with those of the Council's Independent Crowd Advisor (Dr Jim Dickie – High Road West, 9<sup>th</sup> March 2022). **Therefore, the plans and associated assessments do not provide sufficient confidence that THFC would be able to carry out their Zone Ex responsibilities in all circumstances.**
- 1.2 In general, it is understood that there has been limited co-ordinated engagement by Lendlease and Buro Happold with THFC and other stakeholders engaged in event day crowd and transport operations. Without the engagement and transfer of knowledge prior to undertaking the study, there are many key factors and considerations missing or not fully addressed.

## 2. High Road West and Zone Ex

- 2.1 On event days at the Tottenham Hotspur Stadium, the Guide to Safety at Sports Grounds (SGSA, v6, 2018) indicates that the venue operators have a responsibility for assurance of the safety of attendees within Zone Ex (the area in the public domain considered to encompass the main pedestrian and vehicle routes leading from the venue perimeter to public car parks, local train stations, bus stops and so on). The responsibility is to ensure that all stakeholders with a role in supporting the delivery of this outcome are to be engaged and that the measures put in place are implemented in a co-ordinated and consistent way. The stakeholders include emergency services, local authorities and, where appropriate, local landowners.
- 2.2 The area covered by the High Road West Masterplan and LendLease application falls within the Zone Ex area. As such, THFC has accountability for crowd movement within this footprint and needs to be confident that the space available to manage event day crowds is adequately sized and laid out to accommodate safe and effective operations in all foreseeable scenarios. Ultimately, if there is deemed to be a failure in assuring the safety of spectators within Zone Ex it could lead to reductions in the licensed capacity of the venue. One implication of this not being delivered through design wherever possible will be a potential for increased and extended event day staffing requirements, which has a direct economic impact to THFC. Another potential implication is effectiveness

with which THFC can deliver their obligations through their Local Area Management Plan to mitigate the impact of major events on the local community.

- 2.3 There has been no engagement by Lendlease with THFC on this matter prior to the planning submission. The planning documentation was the first opportunity afforded to THFC to understand the proposals for the High Road West Masterplan area. This does not fit with the long term responsibility that THFC (or indeed LendLease) will have for Zone Ex.

### 3. Crowd Flow Study: Key Themes from the Review

- 3.1 The first **Crowd Flow Study** prepared by Buro Happold for Lendlease was only issued in February 2022 (3 months after submission of the application). A subsequent update to the report was issued on 4<sup>th</sup> March 2022. Neither version has been subject to full public or stakeholder consultation. As this is our principal source, the remainder of the comments are related to the content of that report. Further analysis and assessment of the Crowd Flow Study is required, as well as discussions with all stakeholders, but we set out our initial comments below.
- 3.2 There are three key themes that emerge from our initial review of this document:
- The Crowd Flow Study does not sufficiently cover the demand scenarios that may be anticipated to occur on an event day, and therefore cannot conclude that the masterplan design is adequate.
  - The Crowd Flow Study does not adequately address the event day crowd management requirements and the impact that the design proposals have on wider Zone Ex crowd safety and operational flexibility.
  - The crowd and queuing analysis presented in the document cannot be sufficiently sense-checked based on the content of the document alone, so it is not possible to verify the outcomes and resultant conclusions.
- 3.3 These three themes will be considered in turn, cross-referencing the findings of the review undertaken by the Council's Independent Crowd Advisor in parallel where appropriate (Dr Jim Dickie, High Road West, 9<sup>th</sup> March 2022).

### 4. Demand Scenarios and Omissions

- 4.1 In advance of the bidding process for the High Road West development, THFC commissioned Movement Strategies to produce a briefing note for those interested parties (including Lendlease) on event day crowd movement associated with the new Stadium. This document - *Fixed Design Parameters for THFC Stadium/WHL Station Link* – included a series of spatial requirements, including dimensions for routes and dwelling areas. Other than an acknowledgement of the document in Appendix A, there is no mention of the guidance in the Buro Happold Crowd Flow Study and therefore the deviations from the items highlighted in this guidance have not been justified.
- 4.2 The Crowd Flow Study focuses on football event day scenarios. Whilst this is the most frequent occurrence, it is not necessarily the most onerous in terms of the movement and management of spectators. There is no consideration of concert scenarios and a small sub-section that has been recently introduced to consider a 'boxing scenario'. It is noted that the boxing analysis references the planning assumptions for the 2021 boxing event, but does not reflect actual evidence of behaviours captured at that event. We know that there was increased southbound demand for travel at White Hart Lane Station with a 'hard finish', so it would be appropriate to factor in that evidence. Dr Dickie clearly states (p17 of his report) that these exceptional scenarios have not been addressed.

- 4.3 The initial version of the Crowd Flow Study only covered the 'End State', with no assessment of the requirements to manage crowds during the Construction and Build-Out period. As this is programmed to extend for at least ten years, this is a critical aspect to be addressed. The subsequent issue of the document (4<sup>th</sup> March) did include a new section associated with Crowd Flow during construction phasing, but this only considered two potential scenarios and only assessed the post-match queueing associated with a football event. This does not provide confidence that the full range of anticipated outcomes have been considered. There is also no mention of the impacts of construction on pre-event ingress flows.
- 4.4 The impact of engineering works on the rail network is not addressed. Planned blockades and restricted service running have affected a number of event days at the stadium, not to mention the unplanned disruptions that also occur. The impact of such scenarios and the spatial and operational consequences have not been considered at all. Discussion around the need to assess 'What if...' scenarios is also raised by Dr Dickie on p11 of his report. This is a key omission.

## 5. Operational Considerations

- 5.1 The event day operations in this area have evolved since the new Stadium opened in April 2019 and there is a wealth of knowledge about variation in crowd conditions and behaviours in the 'Last Mile' that can be used to support the design. The Crowd Flow Study references two site observations in late 2021 as the evidence base, which suggests that the understanding of operational aspects underlying this study is limited.
- 5.2 Crucially, the Crowd Flow Study is focused on normal egress operations and associated flows and queues. There is no consideration of the crowd flow and safety impacts should there be an emergency or incident that requires the queues to be dispersed or the station cleared (the southbound platform in particular). This would also feed into construction phasing – the proposed design must maintain adequate provision for dispersal and not only the space for queueing itself.
- 5.3 There is an underlying assumption within the analysis that egress flows to the northbound platform are re-directed through the Masterplan area (Moselle Square). This would increase the safety risk to spectators by introducing conflicting flows at the High Road/White Hart Lane junction, which is currently managed to avoid this, particularly in the vicinity of the temporary HVM. There would also be a need for THFC to make upstream changes to circulation on the Podium, which for certain matches is just not possible due to segregation measures. Given that this fundamental change to a key part of THFC's crowd management strategy will affect the safety risk profile, there is no clear justification in the Study nor presentation of mitigations. As indicated earlier, it would also be expected that any variation would require dialogue, analysis and debate with THFC. This matter is also discussed on p10 of Dr Dickie's report.
- 5.4 The study does not make any remark on the movement of those with mobility impairments, including wheelchairs, and the extent to which the proposals support their safe and efficient movement on an event day.
- 5.5 The study report identifies additional facilities within the footprint of the Masterplan, most notably toilets. It is not clear who the facilities are for and where precisely they are suggested. If they are intended to support spectators then additional work needs to be done to look at placement as for the majority of this footprint egressing spectators will be in a queue system and placing toilets inappropriately will create counter-flows and associated risks. The event day operational know-how should be used to inform the provision of any permanent facilities within the design. This equally applies to permanent planters and landscaping elements. The study indicates that they can be accommodated and serviced within the footprint from a capacity perspective, but there is no discussion about how they fit with event day operations and maintaining flexibility for management of different scenarios.

- 5.6 There is a general lack of awareness demonstrated in the study of the key factors that influence behaviours and how these are addressed in the proposed plans. These range from aspects associated with the variation in train frequency and station operations to the make-up of the crowd and their motivations – for example the differences as a result of the finish times of matches, the knowledge of the transport options available and how this affects demand at White Hart Lane station and more direct influences such as consumption of alcohol and the gender and age demographics of the crowd. Such variations may appear subtle on paper but can give rise to significant crowd safety issues in reality if not properly understood.

## 6. Verification of Analysis

- 6.1 Many of the input assumptions around spectator behaviour are taken from the 2015 Transport Assessment - assumptions made before the Stadium was opened. Furthermore, that assessment was based on the current situation at the time (previous Stadium and previous Transport network configuration) and then indicating what mitigations were necessary to accommodate the uplift in capacity. Using actual data on observed behaviours associated with the new Stadium would be a much more sound basis for this, and THFC has collected data of this nature through its own monitoring activities. This is discussed by Dr Dickie on p11 of his report.
- 6.2 There is no justification for the choice of the flow rates and queue density parameters that have been used to ‘test’ the space. There is no specific reference to the crowd conditions observed on site or justified as appropriate for post-event egress.
- 6.3 The ‘available’ space assumed for queuing in the design considers the entire footprint of an area, and does not address that the reality of operating a queue system will mean that it will not be possible to use the entirety of the space. An assessment considering a queue system determined by a minimum width may be more appropriate given that it will likely be served by temporary barrier arrangements.
- 6.4 The analysis is a combination of static analysis and Legion modelling. The nature of the Legion simulation is that it would require a ‘hands on’ review of the model in order to verify the outputs – Dr Dickie also discusses the interrogation of these models on p12 of his report. Nevertheless, the output presented looks questionable. The whole of the queuing area does not exceed LoS D, even though the queue changes width throughout its length, and there is no change in density shown at the narrower points. There is also no clarity on the level of detail that is shown (is it the peak 5 mins, 15 mins, whole egress period?). The ability to rely on the conclusions drawn from this are therefore also open to question.
- 7.1 Based on the initial review undertaken, there are a series of concerns associated with the proposals for the High Road West in relation to event day crowd movement. Given their responsibilities for crowd safety within the Zone Ex set out in the Guide to Safety at Sports Grounds, THFC need to be assured that they can deliver safe and efficient operations in this space, both in its ‘end state’ and during construction. We do not currently consider that submitted Crowd Flow Study has demonstrated that safe and efficient crowd flow operations can be provided during the 10-year construction phase and also during the ‘end state’. Given the fundamental impacts to THFC’s operation, the potential impacts on spectator safety risk profile and the lack of clarity provided in the planning documents, further engagement, information and assessment is necessary to provide this assurance prior to approval.**

## **Appendix M**

Richard Max & Co. letter on behalf of THFC to Haringey Council 30 June 2022

Our Ref: DW:100086.0017

30 June 2022

**By e-mail only: Philip.Elliott@Haringey.gov.uk**

Mr Philip Elliott  
London Borough of Haringey

Dear Mr Elliott

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”)**

We are instructed by Tottenham Hotspur Football Club (“THFC”). We write further to our letters dated 4, 14 and 16 March 2022 and in response to the amended and additional information submitted by the applicant in support of the High Road West Application on 19 May 2022.

**1. INTRODUCTION**

- 1.1. As set out in our previous correspondence the proposals enshrined within the High Road West Application fail to meet the Council and THFC’s longstanding aspirations for the area.
- 1.2. In particular, as a result of the minimal commitment to employment and leisure uses as well as other community and social infrastructure, the scheme will wholly fail to deliver a new premier leisure destination for London – one of the overriding policy objectives set out in the adopted Tottenham Area Action Plan.
- 1.3. THFC had hoped that the deferral of the consideration of the High Road West Application by the Council’s Planning Committee in March, would provide an opportunity for the applicant to pause, properly and meaningfully engage with stakeholders (including THFC), and revise the scheme in response to the issues raised by THFC and the wider community.
- 1.4. The applicant has declined to take this opportunity. With the exception of initial discussions regarding crowd flow matters (set out in more detail below), the applicant has not contacted or sought to engage with THFC to try to address its concerns regarding the design and composition of the scheme.
- 1.5. The amended and additional application documentation submitted in May does not in any way address the significant concerns raised not just by THFC but also by several hundred local residents and community groups, including Tottenham Biz, the Cannon Road Residents Association and the Love Lane Residents Association.

- 1.6. We acknowledge that the application has revised the description of development in direct response to representations made in our previous correspondence. However, beyond that the planning and legal issues raised in that correspondence remain largely extant.
- 1.7. For the avoidance of doubt THFC therefore maintains its objection.

## **2. THE AMENDED AND ADDITIONAL DOCUMENTS**

- 2.1. The High Road West Application documentation makes clear that the future scope of any reserved matters application in respect of the outline element of the scheme will be controlled by a combination of the Parameter Plans, the Development Specification and the Design Codes
- 2.2. The May 2022 amendments do not propose any changes to the Parameter Plans. Very minor amendments have been proposed to the Design Codes.
- 2.3. Likewise, the respective minimum and maximum floorspace figures for the various proposed uses across the scheme set out in the Development Specification have not changed.
- 2.4. The applicant has chosen not to provide any further certainty on the design or composition of the scheme – nor provide any greater commitment to non-residential uses or other public benefits.
- 2.5. There appears to be a minor change to Table 4 which sets out the minimum floorspace of each use for each Development Zone. Previously this indicated that 1800 sqm of local community uses would be provided in Zone 11. This commitment has now been removed and it is striking that the revised Table 4 in the May 2022 Development Specification indicates that the applicant is unwilling to commit to any quantum of community uses within any specific Development Zone.
- 2.6. As a result, THFC's fundamental concerns regarding the scheme have not changed and the matters raised in our previous correspondence have not been addressed.
- 2.7. We do not therefore propose to repeat all the points raised in that correspondence but would highlight the summary matters:
  - 2.7.1. Notwithstanding the belated change to the description of development, Table 3 and 4 of the Development Specification make clear that there is no commitment to provide any B2/B8 use across the scheme or within any individual Development Zone;
  - 2.7.2. The applicant remains unwilling to commit to the delivery of more than 7725 sqm on non-residential floorspace – 4000 sqm of which will fall within Use Class E (a) to (c). This remains less than 3% of the overall quantum of floorspace based on the minimum parameters across the site;
  - 2.7.3. The applicant remains unwilling to commit to the delivery of more than 1500 sqm of leisure or community floorspace across an 8.7ha site;

- 2.7.4. The applicant remains unwilling to commit to any replacement of healthcare floorspace (and we note the repeated outstanding objection from the NHS CCG);
  - 2.7.5. Based on the minimum commitments the scheme could result in a net loss of approximately 50% of the number of existing jobs on the site;
  - 2.7.6. The scheme proposes approximately double the quantum of residential development to that contemplated in the Area Action Plan and adopted High Road West Masterplan Framework, but commits to the delivery of significantly less community and social infrastructure than contemplated in those documents;
  - 2.7.7. The design of the scheme is in direct conflict with the HRWMF guidance that tall buildings should be focused north of White Hart Lane;
  - 2.7.8. There remains over 80,000 sqm difference in the quantum of floorspace proposed between the maximum parameters and the minimum parameters. Likewise, there remains almost 70,000 sqm difference in the quantum of floorspace proposed in the maximum parameter plans in comparison to the illustrative scheme. Potentially an additional 314 homes could be built above that shown in the illustrative scheme.
- 2.8. The application material still fails to provide accurate information to enable a proper assessment of the scheme based on the 'worst case' maximum parameters to be undertaken. For example, in respect of density calculations, open space provision and the percentage of single aspect homes, information is only provided based on the illustrative scheme – not the maximum quantum of development possible under the Parameter Plans.
- 2.9. As set out above, there is the potential for an additional 314 homes to be provided above that shown in the illustrative scheme and the comparative figures for density, open space and single aspect home percentages (amongst other matters) are likely to be materially different in the maximum development scenario. For example, the potential density of development that would be authorised south of White Hart Lane based on the maximum parameters is likely to be significantly higher. This information needs to be provided and properly understood by the Council in its determination of the application.
- 2.10. This is not a matter than can be deferred to the determination of future reserved matters applications given the huge degree of flexibility (and corresponding lack of certainty and control) sought in the Parameter Plans, Design Codes and Development Specification.
- 2.11. We note the specific comments of the Council's QRP in March 2022, when advising that they could not support the High Road West Application, that there was too much flexibility in the parameter plans and design code, that they would encourage a greater level of 'fix', that greater certainty is required regarding the scale and massing of development south of White Hart Lane "to safeguard quality of life and the scheme's relationship with the conservation area". (emphasis added)
- 2.12. The High Road West Application is still in clear breach of the Site Allocation policy in the Area Action Plan – the most relevant planning policy in the determination of the application.

- 2.13. For the reasons set out in our previous correspondence, and in light of the failure by the applicant to provide greater commitment and certainty on the composition of the scheme, given the extreme degree of flexibility sought in both the potential scale of development and the allocation of uses across the site, it is impossible for the Council to properly and lawfully assess the likely significant environmental effects of the development for the purpose of the EIA Regulations.
- 2.14. Likewise, it is impossible for the Council to properly quantify the harm that the application will cause to heritage assets due to the number of different configurations that could actually be delivered. In turn it is equally impossible to accurately quantify the public benefits that the scheme will actually deliver due to the lack of certainty over the delivery of a number of aspects of the proposals. The Council is therefore unable to exercise its duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.15. The degree of flexibility sought and the corresponding lack of certainty over the delivery of public benefits is so broad that the Council is unable to lawfully discharge its duty pursuant to Section 38(6) of the Planning and Compulsory Purchase Act 2004.
- 2.16. These difficulties were illustrated by the omissions contained within the Officer Report to Committee published prior to the deferral of the consideration of the application by the Council's Planning Committee in March – as set out in our letter of 16 March.

### **3. Crowd Flow Issues**

- 3.1. We repeat that the need to provide safe and effective crowd management across the HRW site, gives rise to very real and very significant operational issues for THFC.
- 3.2. The High Road West Application proposes a fundamental change to the current crowd flow arrangements. If the new arrangements do not provide for safe and effective crowd movements, there is a real risk that the operation of the Tottenham Hotspur Stadium could be restricted.
- 3.3. It is for this reason that THFC, and in turn the Council, requires certainty that safe and effective crowd movement will be provided. This goes to the heart of the acceptability of the High Road West Application and this issue cannot lawfully be deferred to consideration at a later date pursuant to a condition or S106 planning obligation.
- 3.4. Since the deferral of the consideration of the High Road West Application by the Council's Planning Committee, further dialogue between THFC and the applicant (and their respective advisors) has commenced and these discussions remain ongoing. For completeness this constituted:
- A meeting of the Tottenham Hotspur Stadium Safety Advisory Group on 6 May;
  - The submission of an updated Crowd Flow Study prepared by Buro Happold on 22 May 2022;
  - A meeting between THFC and Lendlease with respective solicitors and consultants to discuss access provisions on 31 May 2022; and
  - A meeting between Movement Strategies (and other Club consultants) and Buro Happold on 22 June 2022

- 3.5. However, as at the date of this letter there are still a number of fundamental issues that remain to be resolved.
- 3.6. In respect of technical matters, enclosed as Appendix 1 is a note prepared by Movement Strategies setting out their interim comments on the May 2022 Crowd Flow Study. Movement Strategies' conclusion is that it has not yet been demonstrated that safe and efficient crowd flow operations can be provided throughout the 10-year construction period.
- 3.7. At the meeting on 22 June, Movement Strategies were advised that Buro Happold's brief was to ensure that the High Road West Application scheme provided at least the equivalent quantum of space as is currently provided for northbound and southbound queues to White Hart Lane Station on event days – this brief is clear from the content of the May 2022 Crowd Flow Study.
- 3.8. However the assessment should be wider and the focus of the Crowd Flow Study should be to ensure that the scheme is adequately designed to guarantee that safe and efficient event day crowd movement will be provided. At present the May 2022 Crowd Flow Study contains an overly narrow focus on a pure quantitative comparison of queue footprints – without properly assessing whether the proposed arrangements are acceptable and deliverable. In any event Movement Strategies do not yet consider that it has been demonstrated that sufficient space will be provided.
- 3.9. Amongst other matters the May 2022 Crowd Flow Study does not properly consider ingress requirements pre-event, emergency situations or pedestrian flows in the vicinity of the High Road West area not related to queuing to the Station. Unless and until a fully comprehensive analysis is undertaken it is not possible to conclude the safe and efficient crowd flow operations will be provided.
- 3.10. The May 2022 Crowd Flow Study is based on a typical Premier League Football match from recent observations by Buro Happold during the last football season. However, these events were all affected by service capacity restrictions and crowd management to encourage demand away from White Hart Lane Station. They do not therefore represent a robust basis to inform the assessment. Likewise inadequate sensitivity analysis has been undertaken for example to assess the impact of reduced train capacity on queue space requirements.
- 3.11. Buro Happold have advised that they will be undertaking further observations to cover non-Football scenarios. THFC understands that this includes the proposed concerts at the Stadium on 1 and 2 July 2022. The May 2022 Crowd Flow Study will in due course need to be updated to reflect the observations and queuing characteristics for such an event.
- 3.12. The Movement Strategies note identifies a number of other concerns regarding the modelling that has been undertaken and also the temporary proposals during the 10 year construction phase.

- 3.13. In respect of the temporary arrangements, at the SAG meeting in May, a specific concern was raised regarding the proposed hoarding arrangements and the need to avoid restricted “canyons” with inadequate space or exit provisions during emergency events.
- 3.14. The drafted CEMP sets out two hoarding arrangements but suggests that typical construction hoardings would not be relied upon in queue management situations. However, the proposed alternative “Rhino” hoardings will not provide an adequate barrier for the protection of a construction site given the proposed access routes will traverse between the various plots.
- 3.15. In order to provide suitable protection for the construction compounds and suitable egress opportunities during an emergency further width may be required than is currently proposed between the plots in the CEMP and 2022 Crowd Flow Study – again this is not a matter that can be deferred to a condition or planning obligation as it goes to the heart of the phasing arrangements and the plot parameters.
- 3.16. Following the meeting on 22 June, Buro Happold requested additional technical information from the Club. This has now been provided and the Crowd Flow Study needs to be reviewed and updated in light of this information
- 3.17. A prior meeting was held on 31 May between THFC, Lendlease and their respective advisors. At that meeting draft access licence terms were discussed as well as the terms of proposed planning conditions and S106 obligations in respect of the necessary access arrangements. THFC raised several concerns regarding the wording and scope of the proposed terms. It was agreed at the meeting and subsequently in correspondence that the applicant would prepare revised drafting for THFC’s consideration and that further meetings were necessary to progress this documentation. At the time of writing no updated drafting has been provided by the applicant and no date fixed for the necessary follow-up meeting.
- 3.18. Taken together, there remain numerous technical and legal matters relating to crowd safety that are still to be resolved.
- 3.19. The Crowd Flow Study will need to be reviewed and updated to reflect the observations from the July concerts, the technical information provided by THFC and the points raised by Movement Strategies in the meeting on 22 June, and subsequently in the attached note.
- 3.20. In turn further discussions are required between the applicant and THFC regarding the necessary legal mechanisms to ensure the proposed access arrangements for crowd movement and management during both the construction phase and also in the final state are adequate and that sufficient certainty is provided for all parties.
- 3.21. Whilst THFC acknowledges that this dialogue has started, the reality is that these discussions should have been undertaken prior to submission of the High Road West Application and that further time is required to enable them to be progressed.

3.22. As a consequence, the Council is not yet in a position to determine the High Road West Application, and will not be in a position to determine the application unless and until a revised Crowd Flow Study has been made provided (addressing the matters set out above) and THFC (and other stakeholders) have been given an adequate opportunity to review and comment upon that revised information (in accordance with the requirements of the EIA Regulations).

#### 4. Consistency in Decision Making

- 4.1. Consistency in decision making is a fundamental public law principle – see for example Fox Strategic Lane and Property Limited v Secretary of State for Communities and Local Government [2013] 1 P.&C.R.6. Furthermore, when considering the High Road West Application, the Council's refusal of THFC's application for the Goods Yard and the Depot sites (HGY/2021/1771) is a material consideration to which the Council must have regard – see for example R. (on the application of Rank) v East Cambridgeshire DC [2003] J.P.L. 454. In order for the Council to lawfully determine the High Road West Application they must have regard to not simply the fact of the refusal of the THFC application but the reasons for it – see for example R (oao Havard) v South Kesteven District Council [2006] J.P.L. 1734.
- 4.2. The adopted reasoning of the Council is that set out in its Statement of Case, Proofs of Evidence and other material submitted to the Planning Inspectorate in connection with THFC's ongoing appeal.
- 4.3. THFC's appeal against the Council's refusal of that application will be considered at a public inquiry opening on 12 July 2022. Whilst THFC does not agree with the Council's evidence in respect of its appeal, the Council must adopt a consistent approach and the High Road West Application must therefore be determined on the same basis.
- 4.4. There are, however, a number of examples where the approach the Council has taken on THFC's appeal differs markedly to the approach set out in the March Officer Report to Committee in respect of the High Road West Application (and the applicant's own assessments).
- 4.5. For example, in respect of the assessment of the provision of Open Space, the Council's witnesses to the THFC inquiry have asserted that the proper approach is a strict application of the standards set out in the Haringey Open Space and Biodiversity Study (2013) which call for 1.64 hectares of open space per 1000 people.
- 4.6. However, in the March Officer Report to Committee in respect of the High Road West Application, officers did not attempt to even calculate the amount of open space required relative to the 1.64ha/1000 population. If this exercise is undertaken the High Road West Application will fail to meet the required quantum of open space.
- 4.7. In respect of heritage matters, the approach taken by the Council's witness in respect of THFC's appeal is materially different to that taken previously by officers in their assessment of the High Road West Application. This is set out in the Rebuttal Evidence of Mr Froneman submitted on behalf of THFC.

- 4.8. The Council's heritage witness identifies that the THFC scheme would result in the upper end of less than substantial harm to The Grange and the North Tottenham Conservation Area. Likewise she identifies 'mid-to high' less than substantial harm to the settings of 798-799, 819-821 and 867-High Road.
- 4.9. On any reasonable analysis the same degree of harm must arise by virtue of the High Road West Application. Several of the specific criticisms raised, should apply with equal if not more force to the High Road West Application.
- 4.10. In respect of 819-821 and 867-869 High Road, the High Road West Application proposes tall blocks closer to the High Road that would be visible and clearly seen behind these buildings. The Inspector on the previous Goods Yard appeal scheme noted that the impact of the approved Goods Yard towers would be mitigated by their set back from the street frontage – that would not be the same for the buildings proposed within the High Road West Application which are much closer to the High Road.
- 4.11. 867-869 High Road would be juxtaposed with a much greater extent of built form seen behind it in views from the north, meaning that the impact ascribed by the Council in respect of THFC's appeal scheme in the mid range of less than substantial harm would be greater in respect of the High Road West Application – i.e. the upper ranges of less than substantial or potentially substantial harm.
- 4.12. The Council's witness also ascribes a medium level of less than substantial harm to The Grange due to the THFC appeal scheme's redevelopment of the existing access to the west becoming formalised as a street and due to the positioning of blocks to the west and north of the building affecting its current prominence in functional and architectural hierarchy. This impact could only be worsened by the High Road West Application.
- 4.13. Harm to the Grange is said to occur due to the 'backdrop' of the building being dominated by three towers in the THFC appeal scheme. The High Road West Application likewise shows such three towers, as well as additional, closer blocks behind the listed building. There would be a new block immediately to the east of The Grange in the High Road West Application, taller than it, which in the parameter massing steps down only marginally towards it. In the High Road West Application, the Grange is, quite literally, overshadowed by a very tall building diagonally opposite it on White Hart Lane.
- 4.14. On the Council's analysis, the overall impact on the Grange arising from the High Road West Application must therefore be far greater than the THFC appeal scheme, and therefore result in substantial harm.
- 4.15. Given the greater extent of the High Road West Masterplan Application, including significant development south of White Hart Lane, new large scale and tall buildings would affect considerably more of the setting of the North Tottenham Conservation Area – applying Ms Chakraborty's approach – this would have to constitute substantial harm to the Conservation Area.

- 4.16. Other inconsistencies in the Council's approach to the assessment of heritage impacts include:
- The locally listed buildings at 801, 803-805, 809-811, 813-817, 823-829, 841-843, 847-849, 851-853 and 865 High Road are all said to be harmed by the THFC scheme due to the presence of a 'much larger scale of the development currently not experienced within their setting'. The same must apply in respect of the High Road West Application.
  - By the same logic, this must also cause harm to other locally listed buildings juxtaposed with the High Road West Application.
  - The Stationmaster's House would be engulfed by a taller new block immediately behind it, alongside a further block to the side of it.
  - Nos. 8-18 and 24-30 White Hart Lane are identified as heritage assets, the setting of which, the Council considers, would be harmed by the THFC scheme. The High Road West Application would see these buildings demolished.
- 4.17. In turn the criticisms made in the Council's evidence, regarding the design and townscape impacts of the THFC appeal scheme are equally applicable to the High Road West Application.
- 4.18. For example, the criticisms raised in the Council's evidence regarding the spacing and orientation of the tall buildings within the THFC appeal scheme, are directly applicable to the High Road West Application scheme, which proposes spacing between the lower tall buildings below 20m. Mr Wilshere's evidence on behalf of the Council asserts that such spacing would be entirely inappropriate
- 4.19. The Council's townscape witness places great weight on the comments of the Council's Quality Review Panel in the context of the THFC appeal. In respect of the High Road West Scheme the QRP has made clear that it had very strong concerns regarding the density of the proposals, that they would represent overdevelopment and that they could not support the scheme. QRP raised particular concerns regarding the scale and massing proposed south of White Hart Lane. The same importance that the Council places on the QRP comments in respect of the THFC appeal must be applied with respect to their criticisms of the High Road West Application.
- 4.20. Enclosed as Appendix B is an appendix to Mr Ian Laurence's Rebuttal Proof of Evidence, submitted on behalf of THFC. This sets out a number of comparative views of the THFC appeal scheme and the equivalent views proposed in the High Road West Application.
- 4.21. This comparison illustrates that the Council's design and townscape criticisms of the THFC appeal scheme should apply with even more force to the High Road West Application.
- 4.22. Whilst THFC does not agree with the Council's evidence – it represents the public position of the Council as the local planning authority. In the case of the THFC appeal scheme, the Council considers that the failure to provide adequate open space, the heritage impacts and the asserted deficiencies in the design of the scheme are each

sufficient to warrant its refusal. The same position must therefore be adopted on the High Road West Application.

4.23. Against this background the Council has two options. Either it must withdraw its criticisms of and opposition to the THFC appeal scheme or it must refuse the High Road West Application. Failure to take one of these options and approve the High Road West Application will result in an inconsistent and unlawful decision.

## 5. Conclusion

5.1. The High Road West Application remains an unacceptable scheme which fails to comply with the longstanding objectives of the Tottenham Area Action Plan. It will fail to deliver the much-needed genuine transformative regeneration the local community deserves and has long been promised.

5.2. For the reasons set out above and in previous correspondence THFC maintains that as currently presented the High Road West Application should be refused.

5.3. Notwithstanding THFC's in principle objection, the Council is not yet in a position to lawfully determine the application pending the ongoing technical and legal discussions between the applicant and THFC regarding crowd flow safety. For consultation to be lawful it must be meaningful and the Council cannot determine the application until the necessary additional information has been provided and relevant stakeholders, including THFC, have had the opportunity to comment.

Please would you kindly acknowledge receipt of this letter.

Your sincerely



**RICHARD MAX & CO**

## 1. Summary

- I. This document has been produced by Movement Strategies (MS), crowd movement advisors to Tottenham Hotspur FC (THFC).
- II. On event days at the Tottenham Hotspur Stadium, the Guide to Safety at Sports Grounds (SGSA, v6, 2018) indicates that the venue operator (i.e. THFC) has a responsibility for assurance of the safety of attendees within Zone Ex (the area in the public domain considered to encompass the main pedestrian and vehicle routes leading from the venue perimeter to public car parks, local train stations, bus stops and so on). The responsibility is to ensure that all stakeholders with a role in supporting the delivery of this outcome are to be engaged and that the measures put in place are implemented in a co-ordinated and consistent way. The stakeholders include emergency services, local authorities and, where appropriate, local landowners.
- III. The area covered by the High Road West Masterplan and LendLease application falls within the Zone Ex area. The application is being reviewed by Movement Strategies from the perspective of THFC's accountability for spectator safety as well as their own obligations to minimise the event-day impacts on the local community.
- IV. We have reviewed the latest Planning Sub-Committee Report associated with the High Road West Masterplan Application submitted by LendLease (HGY/2021/3175). We have also reviewed two documents produced by the Council's Independent Crowd Advisor - Dr Jim Dickie – dated July 13<sup>th</sup> and July 14<sup>th</sup> 2022. The document dated July 14<sup>th</sup> is referred to in the Planning Sub-Committee Report.

## 2. Crowd Flow Considerations Not Currently Addressed

1. As a starting point it is important to note that the submitted Crowd Flow Study and in turn Dr Dickie's review have not considered a number of matters that are fundamental to an assessment of whether the application will ensure safe and efficient crowd flow. We also understand that the Crowd Flow Study has not been updated since the first concerts held at the stadium on 1<sup>st</sup> and 2<sup>nd</sup> July, which Buro Happold indicated they would be present at to observe.
2. The area covered by the High Road West Masterplan and LendLease application falls within the Zone Ex area of Tottenham Stadium. THFC has accountability for crowd movement within this footprint and needs to be certain that the space available to manage event day crowds is capable of accommodating safe and efficient crowd flows in all scenarios. Ultimately, if there is deemed to be a failure in assuring the safety of spectators within Zone Ex it could lead to reductions in the licensed capacity of the venue.
3. One further consequence of this not being delivered through design will be a potential for increased and extended event day staffing requirements. The requirement to account for spectator safety in Zone Ex is detailed in the SGSA's Guide to Safety at Sports Grounds, which places the onus on THFC. Another potential implication is effectiveness with which THFC can deliver their obligations through their Local Area Management Plan to mitigate the impact of major events on the local community.
4. **Both the applicant and the OR undertake a narrowly focused comparison of the quantum of space to be provided. By limiting its focus to indicating the spatial equivalency of queue footprints, the LendLease**

**application and associated Crowd Flow Study omits to consider a number of important factors including any consideration of requirements for ingress, emergency conditions, and any flows in the vicinity of the area not related to the Station.** The advice from the Council's Independent Crowd Flow advisor is also limited to this by the nature of the two questions he is posed in his most recent report (Haringey Questions – July 14<sup>th</sup> 2022).

5. The areas where LendLease/Buro Happold have not provided evidence that the masterplan proposals can accommodate what is required to enable successful management of crowd are:
6. **Spatial Impact of Emergency Conditions.** The Crowd Flow Study is focused on normal egress operations and associated flows and queues. There is no consideration of the crowd flow and safety impacts should there be an emergency or incident that requires the queues to be dispersed or the station cleared (the southbound platform in particular). There is also the potential for a scenario where the Stadium itself is evacuated, in part or in whole. **The proposed design should demonstrate that it maintains adequate provision for dispersal in the different potential demand scenarios.** This is both in the end state and during construction.
7. **Degraded Conditions on the Rail Network.** The impact of engineering works on the rail network is not addressed. Planned blockades and restricted service running have affected a number of event days at the stadium, not to mention the unplanned disruptions that are also occurring more frequently. The impact of such scenarios and the spatial and operational consequences have not been considered at all.
8. **Accessibility.** The application does not make any remark on the movement of those with mobility impairments, including wheelchairs, and the extent to which the proposals support their safe and efficient movement on an event day. The Council has a statutory duty when determining the planning application under the Equality Act to advance the equality of opportunity, which will not be addressed if those with mobility impairments have not been properly considered.
9. **Spectator Flows on White Hart Lane.** During construction, there is a statement that Plot G does not have an impact on the existing crowd flow strategy. This is not true. The phasing diagrams indicate that this Plot includes part of the southern pavement of White Hart Lane and this is a critical location during both ingress and egress – with heavy usage by spectators travelling by other modes as well as train. The impacts of Plot G on the event day operations should be addressed.
10. **Spectator Flows on the High Road.** In the Construction Phasing, both plots C & E extend into the High Road, which in itself forms a key part of the Zone Ex for ingress and egress. There is no discussion on the impacts of the construction hoarding on event day crowd operations within the High Road.

11. **Flow Management in Emergency Conditions.** For each of the construction phases there is little information provided for managing flows in the event an incident or emergency. Assurance that the various phases of construction offer sufficient provision for emergency service access and safe crowd dispersal from these areas should be provided. A particular concern is raised in relation to the local risks associated with the holding of queues within a space bounded by hoarding on either side, the types of barrier in use and the provision of ample means of escape. **In order to mitigate safety and security risks that would otherwise be present, accommodation of this is likely to necessitate an additional footprint to that set out for northbound and southbound queuing in the CEMP.** This specific point was raised (and minuted) at the Special Safety Advisory Group meeting on the 6th May 2022, with a requested action from the chair for LendLease's security consultants to liaise with THFC's Security team. It is understood that there has been no subsequent engagement.

### 3. Review of Planning Sub-Committee Report

12. There are only six paragraphs in the Planning Sub-Committee Report associated with THFC match and event day Crowd Flow (6.33). The points raised in each of these paragraphs are taken in turn.
13. The first paragraph (6.33) indicates that the proposals provide a direct link between the Stadium and White Hart Lane Station, and that the proposals provide at least equivalent queuing provision for the Station on event days as the current arrangements. Whilst both of these points are agreed, for the reasons set out above and in our previous notes we do not consider that this is the correct approach to assess whether safe and efficient crowd flow can be accommodated.
14. Paragraph 6.34 shows modelling from the Buro Happold Crowd Flow Study and the accompanying text states that the proposed layout has greater queue capacity than the current layout. This modelling was undertaken prior to the provision of the current event-day plan – which has a greater capacity than that used in the model. However, in any event a narrow focus on the equivalence of the queue space provided is not the only element to consider when determining whether safe and efficient crowd flow can be accommodated.
15. There is reference to assessment of a Cup Game scenario in Paragraph 6.34, which is described as providing an indication of impacts from other less regular events such as boxing contests and concerts. This approach does not consider the distinctions between crowd behaviours, demographics and expectations between the different event types. These are all factors that need to be considered in the development and discharge of an Event Management Plan for each event – which THFC are responsible for in the form of the Local Area Management Plan. As matters currently stand, we do not consider that there has been sufficient analysis and dialogue with THFC about crowd movement associated with these events. Therefore, the Council cannot conclude that it will be possible for the impacts of different event types to be solely mitigated through an Event Management Plan. It should also be noted that THFC supplied more information to Buro Happold in June 2022 relating to demand conditions at non-Premier League fixtures, which has not been used as the basis for the analysis referred to here.
16. Paragraph 6.35 discusses the Construction Phasing, and states that the Crowd Flow Study demonstrates that the equivalent queuing provision can be maintained. This is not the case. The Crowd Flow Study only considers a sub-set of the construction Phases set out in the Construction Environment Management Plan (CEMP). Dr Dickie's document referred to an email exchange with Buro Happold on July 12<sup>th</sup> (which THFC were not party to and have not seen), where the construction analysis was re-visited. If these figures are to be relied upon then they do show that the space provided are within 4m<sup>2</sup> of being the equivalent footprint for the southbound queue. This is an area where the focus by LendLease/Buro Happold on area and space has led to factors around operation, management and safety to be omitted. Irrespective of the provision of space for queuing, there are important aspects related to crowd safety and flow during the construction phasing that have **not been addressed**.

17. Paragraph 6.36 discusses the THFC objection, and the review by Dr Dickie – ‘*who considers that the current and proposed queuing provision is sufficient to enable safe management and movement of spectators at events between the stadium and White Hart Lane Station during premier league football fixtures.*’ This statement does represent Dr Dickie’s position, but is clearly defined and limited to the size of the queuing provision. Event day crowd management and movement through the proposed masterplan footprint is not limited to the queues for the station, but Dr Dickie has only been directed to look at this aspect (see ‘Haringey questions (e-mail May 31 2022 v3). In our discussions with Buro Happold, they also indicated that the sole objective they were asked to prove was the equivalency of space for queue management at the station. Crowd Flow considerations not covered by the application or Dr Dickie’s review are highlighted in the second section of this note.
18. Paragraph 6.36 also references the queue conditions on other event-day types – ‘*Excessive queues can be experienced for concerts, boxing matches, occasional football matches with late finishes in the current queuing arrangements however this can be safely resolved through the Event Management Plan with measures such as effective communication to spectators.*’ This indicates that there is recognition of a series of event types where different crowd conditions will occur and there will be a need for different management. This is known by THFC and there is considerable effort on behalf of the club to plan for and manage crowd conditions in the Stadium vicinity. However, the Council does not have sufficient information to determine whether or not these issues can be addressed solely through an Event Management Plan before accepting a masterplan design.
19. Paragraph 6.38 states – ‘*The submitted parameters and illustrative masterplan can accommodate the spatial requirements required to enable the successful management of crowd flows on event days.*’ **It is not possible to make this statement on the basis of the evidence supplied as part of the submission, or the independent review undertaken on behalf of the Council. The scope of the assessments and conclusions are limited to the post-event queuing to access White Hart Lane Station, and therefore it is not proven that other aspects related to event day crowd flow, safety and management can be accommodated by the masterplan.**
20. **Fundamentally the objective of the Crowd Flow Study and any evaluation of the proposals must be to ensure that the application proposals are adequately designed so that they can safely accommodate event day crowd movement and associated operations**In Section 2 above we set out a number of highly material issues which have not been considered by the applicant in the Crowd Flow Study. In Section 4, we consider other items raised by Dr Dickie.

## 4. Additional Comments on Dr Dickie’s Documents

21. There are two recent documents available on the Planning Portal authored by Dr Dickie. These are:
- ‘Haringey Questions (May 31 2022) v3’ dated 14<sup>th</sup> July 2022
  - ‘Buro Happold – Crowd Flow study in support on Lendlease’s hybrid planning application concerning the High Road West development’ dated 13<sup>th</sup> July 2022

### Comments on ‘Haringey Questions’

22. Dr Dickie’s document is drafted to provide direct answers to the questions he has been asked. THFC has not been provided with the email in which the questions were posed and therefore the rationale for their selection. The two questions posed are only related to the queuing provision and equivalency with the existing footprint and therefore his brief is tightly framed. He has not been (and in our view should have been) asked any questions about the wider ability of the scheme to safely accommodate event-day crowd flow.

23. Nevertheless, he does indicate that there are types of events where the queuing provision will need to be supported by an Event Management Plan for the proposals to be acceptable.
24. Dr Dickie references that the Event Management Plan worked well when there were rail problems on the day of the event which took place on May 1<sup>st</sup> 2022. There is also a comment around travel information supplied prior to the recent Guns N' Roses concert that was comprehensive and beneficial. These Event Management Plans (more specifically, the Local Area Management Plan or 'LAMP') were developed by THFC, with input from stakeholders. **Therefore, Dr Dickie is saying that the proposals are only acceptable for Category 2 events if accompanied by a Plan that has to be developed and implemented by THFC.**
25. Therefore, for the proposals to be accepted, THFC and the decision maker need to be satisfied that LendLease can develop a workable plan for these scenarios. It is clear from dialogue to date, that whilst there have been an ongoing discussions, they have yet to reach a conclusion. It does not follow that because an Event Management Plan appeared to work well previously that it can be applied/work well for all scenarios, given the fundamental changes to the environment both in the end state and during construction. Dr Dickie himself also indicates that NFL games are different to other Category 2 events, presumably due to the changes in the ability to communicate with attendees.
26. Dr Dickie clearly states that the assessment of the construction phases should not solely be a question of area and equivalency, and indeed highlights that Buro Happold themselves demonstrate that there are opportunities for improvements. Dr Dickie also categorically excludes the construction phasing when responding to the second question proposed by the Council. **The need to consider more than just the equivalency of space have not been addressed by the applicant as part of an update to their Construction Environmental Management Plan. It is therefore not appropriate to proceed without further scrutiny and development of these plans.**

Comments on 'July 13' Note

27. This document is a 'walk through' of the May 2022 version of the Crowd Flow Study produced by Buro Happold in support of the LendLease application, with commentary on specific points made in line. The document is structured to match the Study report and does not in itself state any objectives or formulate a conclusion. It appears to have been drafted to highlight points that have been added by Buro Happold since the February draft which Dr Dickie, Movement Strategies and THFC commented on in April 2022.

28. Dr Dickie indicates that more comprehensive detail on the data obtained (p5) and information on the assumptions behind the Legion modelling (p4) are necessary in order to establish the merit of the conclusions drawn. This is concurred with, and such a concern has led to a dialogue with Buro Happold to provide further clarity. Additional information has subsequently been supplied by THFC but not factored into an updated analysis.
29. Importantly, Dr Dickie later re-visits this point (on p9). *'Without detailed knowledge of the computer model and given what has been observed I would not be confident in drawing and conclusion other than the illustrative Masterplan is demonstrably superior to the existing layout as regards the SB queue provision.'* **If, as we suggest, there is a need to consider more than just the equivalency of space, then Dr Dickie indicates that the information supplied does not allow him to draw any conclusions beyond this.**
30. Dr Dickie notes that the analysis of a Concert scenario is not included and provided his own assumptions around this scenario. THFC has subsequently supplied their own assumptions for a concert scenario and the Guns N Roses concerts in July 2022 were monitored and observed. The Buro Happold Study does not include any analysis of a concert scenario.
31. The need for an Event Management Plan to achieve reduction or re-direction of spectators in the queuing areas is a conclusion drawn by Dr Dickie when reviewing the analysis of the 'stress test' scenario. By re-iterating that it is fundamental to the successful delivery of crowd management, it follows that the Council needs to be satisfied that that an Event Management Plan can be delivered for all foreseeable scenarios in the context of the Masterplan and the various construction phases. We do not consider that the Council is able to reach that conclusion based on the information currently provided by the applicant.
32. On p10, Dr Dickie states that – *'In this writer's opinion Fig 6-7, illustrating the current crowd flow procedures, seriously weakens THFC's objection.'* It is believed that this relates to an objection made by THFC about avoidance of 'funnelling' within queue systems. Fig 6-7 shows an image of the flow past the temporary HVM at the High Road-White Hart Lane junction during egress where 'funnelling' occurs in the current configuration. It is considered preferable to avoid funnelling within any egress flow system to minimise safety risks and/or need for mitigation. **As such, when any new parts of the system are designed, this should be avoided wherever possible.** The current situation is a result of the requirement from the Council to include an HVM at this location. It is understood that THFC expressed to the Council at the time that this introduced a pinchpoint and that they would seek to avoid this, but no alternative position was agreed and therefore THFC's Local Area Management Plan adapted accordingly.

## 5. Conclusions

33. THFC has accountability for the safety of crowds as they move to/from the Stadium through Zone Ex on an event day. The masterplan falls within Zone Ex. The LendLease justification of the scheme from a crowd flow perspective focuses on demonstrating that the masterplan has the equivalent space for the event day queues associated with White Hart Lane station. The approach is overly simplistic for the reasons set out. The Planning Application Sub-Committee report (and questions asked by the Council of an Independent Crowd Expert) have followed this line of thinking. As identified in review, there are a series of omissions from the application and supporting evidence related to crowd movement, a number of which have implications for the spatial requirements.

34. Furthermore, the review by the Independent Crowd Expert indicates that there is a category of event where the acceptability of the proposals are subject to the design and successful implementation of an Event Management Plan. It has not yet been demonstrated that a successful Event Management Plan is capable of being delivered within the proposed scheme.
35. As set out above Dr Dickie also categorically excludes the construction phasing when responding to the second question proposed by the Council. Therefore, this key issue has not been considered.
36. **As such, we do not consider that the application fully demonstrates that safe and efficient crowd flow operations can be provided throughout the 10-year construction phase and also during the 'end state'. The implications for this may be a requirement for uplifts in event-day management, with associated costs and impacts on local amenity, or a reduction in the licensed capacity of the venue.**

## **Appendix N**

Richard Max & Co. letter on behalf of THFC to Haringey Council 20 July 2022

Our Ref: DW:100086.0017

20 July 2022

By e-mail only: [Philip.Elliott@Haringey.gov.uk](mailto:Philip.Elliott@Haringey.gov.uk)

Mr Philip Elliott  
London Borough of Haringey

Dear Mr Elliott

**High Road West Hybrid Planning Application (reference HGY/2021/3175) (“the High Road West Application”).**

We write in response to the Officer’s Report to the Planning Sub-Committee meeting on 21 July 2022 regarding the High Road West Application (“the OR”) on behalf of our client, Tottenham Hotspur Football Club (“THFC”).

The OR is largely based upon the earlier report to the Planning-Sub Committee meeting on 17 March 2021 - when members subsequently deferred consideration of the High Road West Application.

Unfortunately, the OR still fails to properly and fairly set out all the issues raised by THFC in its representations dated 4, 14 and 16 March and 30 June 2022 and fails to address the fundamental concerns raised in those representations.

For the reasons set out below THFC maintains that the Council is still not yet in a position to lawfully determine the High Road West Application. If the Council does determine the High Road West Application, a decision to grant planning permission would be legally flawed.

**1. CROWD FLOW AND SAFETY**

- 1.1. The OR refers to and relies upon the advice from Dr Dickie which we understand is contained in two notes both dated 13 July and 14 July. The note dated 13 July has only been made public very recently after publication of the 14 July note (and both after publication of the OR). Given the importance of this issue, and the weight the OR places on Dr Dickie’s advice this is wholly unacceptable. Whilst THFC’s consultants, Movement Strategies, are in the process of reviewing Dr Dickie’s notes and will provide their comments in due course, the lateness with which these documents have been published deprives interested parties the opportunity to properly review and consider them in advance of the Council’s determination of the High Road West Application.
- 1.2. The OR deals with Crowd Safety in only cursory terms in 6 paragraphs (6.33-6.39). Paragraph 6.36 records that THFC has objected on the basis that it considers the submitted Crowd Flow Study is inadequate.

- 1.3. However, no explanation is provided to members as to why THFC considers the Crowd Flow Study to be inadequate. Likewise, the OR still fails to properly and fairly explain to members the real significance of the issue, the safety risks involved and the potential significant implications to the operation of the Tottenham Hotspur Stadium.
- 1.4. The OR at paragraph 6.37 states that:

*“Officers, the applicant and the Council’s independent Crowd Flow Expert are satisfied that the existing queue provision within the site can be re-provided as a minimum both during construction and once the development is complete”*
- 1.5. THFC has explained in its previous representations that it is not appropriate to narrowly focus on a comparison between the quantum of space provided now, during construction of the development, and once the development is complete.
- 1.6. A wider assessment is required to determine whether crowd flows can be managed safely and efficiently across the High Road West site following the stopping up of the existing access routes along Love Lane.
- 1.7. The note from Dr Dickie makes clear that he was asked to respond to two very specific narrow questions relating purely to the quantum of space available.
- 1.8. The first question requested confirmation whether the minimum area allowed for in the parameter plans is equivalent to the existing area for crowds to queue to the station. The second question sought clarification about whether the parameter plans exceed the existing area and therefore provide a better position as compared to the existing position.
- 1.9. Dr Dickie’s conclusion makes clear that *“During the construction phases it is not appropriate to couch questions solely in terms of area”*. This reflects THFC’s key concern. It is also clear from the wording of Dr Dickie’s conclusion that he has not found that the information he has been provided with sufficiently addresses the position during the construction phase. It is therefore misleading for the OR to suggest at paragraph 6.36 that he considers the proposed queuing provision is sufficient.
- 1.10. The reality is that the crowds will need to traverse across a large construction site for potentially over 10 years – amounting to over 500 events. The issue is not purely regarding space. For example, at its meeting on 5 May 2022 the Stadium Safety Advisory Group raised specific concerns regarding the boundary treatments and in particular the risk of large crowds being trapped between large construction hoardings with no means of escape during an emergency.
- 1.11. Furthermore, THFC now understands that the Metropolitan Police Counter Terrorism Protective Security Operations have objected to the High Road West Application on this basis – highlighting that concerns they have raised previously have not been satisfactorily addressed.
- 1.12. In respect of boundary treatments, the submitted CEMP states that either “Rhino” barriers or traditional hoardings will be used depending on whether they are bounding queue areas or not. Rhino barriers - by virtue of their low height – are inappropriate for crowd management.
- 1.13. More fundamentally, whilst the CEMP sets out a suggested sequence of temporary routes through the construction site, no analysis has been undertaken of the safety of the boundary treatments and the need for suitable escape routes during emergencies.

The reality is that far greater space is likely to be required than is currently contemplated, which has not been considered in relation to the parameter plans or construction plots

- 1.14. The OR records that the detailed layout of the site and an interim crowd management strategy will be secured at the reserved matters stage and by condition (proposed as draft Condition 62).
- 1.15. Condition 62 requires the proposed interim crowd management report/strategy to *“confirm that the interim access and space for visitors to the stadium across the development is no less than the situation as at the date of grant of this planning permission in terms of minimum queue widths, minimum areas for queuing and general queue safety such as tripping hazards and ensuring queue configurations and locations meet the necessary requirements for crowd safety”* (emphasis added)
- 1.16. The Council may only lawfully impose such a condition if it has sufficient information to enable it to conclude it is capable of being discharged in due course. The submitted Crowd Flow Study and CEMP do not provide the Council with sufficient information to enable it to rationally and reasonably reach the conclusion that the proposals can meet the necessary requirements for crowd safety. Similarly, the issue of crowd flow is one that goes to the principle of development and cannot be left to reserved matters. The Council cannot lawfully decide the current application until it has sufficient evidence before it to reach a conclusion that there will not be any unacceptable crowd safety issues as a result of the proposed development.
- 1.17. Paragraph 187 of the NPPF sets out the ‘agent of change’ principle. The insufficiency of information prevents the Council from concluding that the development will not have a significant adverse effect on the operations of THFC. There is no mention let alone consideration of this policy in the OR nor to the commentary in the TAAP Policy NT7 which provides that the Council will work with THFC to ensure nearby developments respect the operational needs of the stadium.
- 1.18. By way of one example the Crowd Flow Study (originally submitted in February and then updated in May) does not factor in any analysis of non-sporting events such as concerts. THFC is aware that the applicant’s consultants Buro Happold have monitored the first concerts held at the stadium on 1 and 2 July – but this analysis has yet to be factored into the Crowd Flow Study.
- 1.19. Dr Dickie’s note defines such irregular events as “Category 2” events. He records that for such events there will be a queue of approximately 6000 people – with spectators having to wait for more than one hour to enter the station.
- 1.20. Dr Dickie concludes that with the exception of NFL events, excessive queues can be avoided – however this is reliant upon Event Management Plans being successful. Dr Dickie provides no assessment of how a queue of up to 6000 people through the High Road West construction site could be accommodated. He provides no commentary on how much space would be required for such queues to accommodate emergency egress requirements, the necessary boundary treatments to provide safe access or the geometry of such routes.
- 1.21. Furthermore, any effective solution will require THFC and spectators to be provided with legal binding rights of access across the construction site.
- 1.22. THFC has had two initial meetings with the applicant and its advisors and has been provided with copies of the proposed draft S106 obligations. These discussions are,

however, at a very early stage, and there are a number of points of principle that remain to be resolved. In particular THFC has explained to the applicant that it requires certainty that the proposed access will be provided.

1.23. The currently proposed wording that has been provided to THFC provides no certainty whatsoever to THFC that the necessary access will be assured.

1.24. By way of example –

- a. The proposed obligation to provide access is only triggered once the applicant obtains a legal interest in the whole of the proposed access area and an access licence has been entered into – however, no clarity has been provided to THFC on the timing of the applicant acquiring such an interest. In practice THFC understands that this will not occur until completion of the relevant phases – which will be long after the need for the new access route arises. In short, the obligation proposed by LendLease does not work.
- b. The obligation to enter into an access licence is only a “reasonable endeavours” obligation. This leaves open the high probability that neither THFC nor the Council will have sufficient legal control over the routes between White Hart Lane station and the High Road to ensure the safe and secure passage of spectators. This in turn would fetter the ability of all stakeholders, including THFC, the Council and the emergency services to perform their statutory responsibilities in respect of Zone Ex. This is not an issue to be deferred to reserved matters as the planning obligations upon which this scheme is reliant at cast now at outline stage.
- c. As currently drafted the obligation to provide a temporary access route during the construction process is entirely discretionary. The obligation is only that the applicant “may” at its own discretion provide such access. This provides no certainty whatsoever.
- d. The applicant is seeking an unspecified licence fee for providing such access – in circumstances where THFC relies on the public highway for which no such fee arises. THFC has made clear on several occasions to the applicant that it will not pay any such licence fee.
- e. The entire obligation falls away if the access licence has not been entered into by the time the applicant acquires a legal interest in the land over which access is sought.

1.25. This risks THFC being placed in the unacceptable and wholly unreasonable position of not knowing whether such access will be provided in circumstances where the applicant fully acknowledges such access is necessary to provide safe and efficient crowd movement as a result of the High Road West Application.

1.26. All the analysis undertaken by Buro Happold on behalf of the applicant and by Dr Dickie on behalf of the Council regarding crowd safety matters is entirely dependent upon access actually being provided across the High Road West site (both during construction and upon completion).

1.27. No analysis has been undertaken or a proposal put forward by the applicant of an alternative solution that does not rely on access across the site. Given officers advice to members in the OR, unless the necessary access is actually guaranteed (both during construction and following completion), no weight can be placed on the proposed solutions and the Council cannot reasonably conclude that the necessary requirements for crowd safety will be delivered.

- 1.28. The current suite of planning conditions and obligations fall a long way short of providing the necessary certainty. These obligations are a material consideration in the determination of the application.
- 1.29. It is clear that further assessment and discussions are required regarding crowd safety matters and access arrangements. THFC remains extremely concerned that the applicant has not:
- a. carried out the full technical analysis necessary to demonstrate to both THFC, the Metropolitan Police Counter Terrorism Security Advisor and the Council's own independent consultant that safe passage of spectators can be achieved; and
  - b. put forward credible planning obligations and access rights to ensure that in the event that safe arrangements can be achieved, legal certainty is provided in respect of the provision of access that can reasonably be relied upon by THFC and its stakeholders in respect of Zone Ex responsibilities.
- 1.30. In this context, THFC is extremely concerned that the Council is rushing to determine the application before these issues have been properly resolved and that for the reasons set out above, the Council is not in a position to lawfully defer further consideration of this issue to future reserved matters applications or the discharge of conditions or planning obligations.

## **2. RELEVANCE OF GRANT FUNDING**

- 2.1. The conclusions of the OR highlight the huge importance and weight that officers place on the provision of grant funding towards the delivery of the scheme, in their recommendation for approval of the High Road West Application.
- 2.2. Paragraph 30.2 records that “...*the scheme is eligible for in the region of £90m of grant funding that ensures it is both deliverable and that the Love Lane estate regeneration can occur within the foreseeable future. Any delays in obtaining planning permission will likely lead in the loss of this funding and render the scheme undeliverable*” (emphasis added).
- 2.3. Paragraph 30.3 states “It is considered that this funding provided a very significant benefit that weights [sic] in favour of the proposal”
- 2.4. In turn Paragraph 31.2, when undertaking the overall conclusion states “*It is considered that this represents a prime opportunity, mostly as a result of the significant level of funding available, to demonstrable improve this environment for existing residents, such that it is the opinion of Officer’s [sic] that the scheme should be considered favourably*” (emphasis added)
- 2.5. However, nowhere in the OR (or the submitted High Road West Application documentation) is any explanation provided to members or to the public about how the grant funding “ensures” delivery of the scheme. Indeed, the latest FVA note submitted by DS2 on behalf of the applicant does not mention the grant funding and indicates that there is still a deficit – this is a long way from “ensuring” deliverability.
- 2.6. No explanation is provided to members why “any delays in obtaining planning permission” will mean the funding is lost and the scheme is undeliverable.

- 2.7. Given the very significant weight attributed to the grant funding this is an unacceptable omission. The OR expressly identifies that the High Road West Application departs from the development plan (para 30.1), departs from the High Road West Masterplan Framework (para 26.9), will cause heritage harm (para 29.6) and will have negative aspects (paragraph 31.2).
- 2.8. Notwithstanding the identified “negative aspects” officers have recommended that the application be approved. Paragraph 31.2 of the OR makes clear that the availability of the grant funding is the key consideration that officers have relied on to recommend approval. The implication being that in the absence of the grant funding their recommendation may have been different.
- 2.9. In these circumstances, members cannot place any weight on the availability of grant funding unless they are properly and fully advised how that grant funding actually “ensures” delivery. To do so would amount to an unlawful reliance on an immaterial consideration.
- 2.10. In turn, members need to understand the precise deadlines after which the grant funding will be lost and whether there is any flexibility for this grant funding to be extended to provide time for the application to be properly considered. No information is provided to substantiate the claim that “any delays” would cause a funding problem.
- 2.11. Given the scale and impact of the High Road West Application scheme, the assessment and determination of the application should not be artificially rushed based solely on a need to meet an unspecified and unevidenced grant funding deadline.
- 2.12. The absence of any information on this point unlawfully prevents THFC, consultees and other interested parties from properly considering the validity of these claims which are at the core of the OR’s justification for recommending approval.

### **3. HERITAGE MATTERS**

- 3.1. Officers’ assessment of the heritage impacts of the proposals is set out section in Section 10 of the OR.
- 3.2. In various places the OR refers to the comments of the Conservation Officer and elsewhere an appointed heritage specialist. In Appendix 3, under the Conservation Officer comments, members are referred to Appendix 12 which is the report of Ms Chakraborty – the independent heritage specialist. We therefore assume that references in the main OR to the Conservation Officer should be taken to refer to Ms Chakraborty. If this is not correct, then the Conservation Officer’s own views have not been made publicly available.
- 3.3. In any event, it is clear that Officers have placed great weight on the report prepared by Ms Chakraborty. As you will be aware Ms Chakraborty is also the Council’s expert witness in respect of heritage matters at the ongoing public inquiry into THFC’s appeal scheme for the Goods Yard and Depot sites.
- 3.4. During her evidence at the public inquiry, Ms Chakraborty made a number of statements regarding her assessment of the High Road West Application. Most importantly she explained that her assessment of the High Road West Application had assumed THFC’s existing planning permissions for the Goods Yard and Depot sites formed part of the current baseline for assessment purposes. She confirmed that her assessment did not therefore address the impact from those schemes.

- 3.5. Given that the approved Goods Yard and Depot planning permissions have been incorporated into the parameter plans as part of the High Road West Application, this is a significant omission. In practice, it means Ms Chakraborty's assessment of the harm caused by the High Road West Application will have been materially understated.
- 3.6. At paragraph 10.36 of the OR, officers record an overall finding based on Ms Chakraborty's assessment that the scheme would result in "medium-high level of less than substantial harm to the setting of significance of designated and non-designated heritage assets". If a proper and full assessment including the impacts of those part of the High Road West Application that reflect the existing Goods Yard and Depot planning permission, were undertaken, it is inevitable that a greater degree of harm would be identified.
- 3.7. In addition, there are a number of discrepancies between Ms Chakraborty's report and the OR, and also within the OR itself.
- The table at para 2.11 that Ms Chakraborty uses to determine levels of harm is incorrect. It confuses the importance of the heritage asset with the level of harm. The resulting attribution of harm according to this methodology provides an incorrect assessment that cannot be relied on. This approach also contradicts the NPPF and Historic England's guidance on setting.
  - Para 10.13 of the OR states a requirement that the impact of the proposal on the heritage assets be *very carefully considered*, that is to say that *any harm or benefit needs to be assessed individually* in order to assess and come to a conclusion on the overall heritage position.
  - The OR does not reflect the medium less than substantial harm to the locally listed building at 865 High Road that Ms Chakraborty identifies.
  - Ms Chakraborty finds the demolition of the locally listed Electricity substation on the High Road would cause a "negligible level of harm". As a matter of fact, this entails the total loss of the heritage asset.
  - For the locally listed building at 6a White Hart Lane, Ms Chakraborty finds a low level of harm plus additional harm. The OR does not reflect the additional harm.
  - For the grade II listed building at 7 White Hart Lane, Ms Chakraborty finds a high degree of less than substantial harm to the listed building due to the proposed block G. This is reflected in the OR. But Ms Chakraborty additionally finds further harm due to the taller blocks. That is not reflected in the OR. This is especially important, since this additional harm would tip the harm from less than substantial to substantial harm, for which different policy tests apply. The OR does not address this issue. Para 10.1 of the OR only advises on the test in para 202 for less than substantial harm. The implication is that substantial harm is not relevant, though Ms Chakraborty's assessment does not rule that out.
  - Given that Ms Chakraborty found a high level of less than substantial harm to the North Tottenham Conservation Area, and given that, as set out above Ms Chakraborty has confirmed that she treated the extant permissions as part of the baseline, this would tip the harm from less than substantial to substantial harm, for which different policy tests apply. The OR does not address this issue.
  - The harm to the North Tottenham Conservation Area is especially relevant given the OR recognises at para 10.14 that the North Tottenham Conservation

Area is in a fragile condition and it is currently designated a “Conservation Area at Risk” by Historic England.

- Ms Chakraborty found a mid-level of less than substantial harm to the Church of St Francis de Sales on the High Road. Approximately 100m to the south is a grade II listed building at 707 High Road. It follows that there would likely be a similar impact on this building. However, there is no assessment of this listed building.
- Ms Chakraborty’s assessment omits any assessment of a non-designated heritage asset at 8-18 and 24-30 White Hart Lane, as identified in relation to the Goods Yard scheme. It is wholly inconsistent for the Council to treat this as a heritage asset in relation to one application, but not another, at the same time.
- None of the harm that Ms Chakraborty found to the listed building at The Grange in relation to the changes on White Hart Lane at the Goods Yard scheme are reflected in the assessment of the same building in this application. That is a wholly inconsistent approach.

- 3.8. By way of further example paragraph 10.21 of the OR finds a “medium level of less than substantial harm” to the listed building at 797-799 High Road. At paragraph 10.23 however the OR records that “a low level of less than substantial harm to the setting of no. 797-799 High Road”.
- 3.9. This contradiction is not explained, and it is unclear which of these assessments has been weighed in the balance in the OR.
- 3.10. Similarly, the OR contains no mention that the locally listed buildings at 743-759 High Road will all be demolished. There is no assessment of the harm arising from such demolition and therefore this harm cannot have been weighed in the overall balance.
- 3.11. We have previously highlighted our concerns that given the degree of flexibility sought by the High Road West Application and the corresponding lack of certainty regarding the delivery of public benefits that it is argued offset that harm, it is impossible for the Council to lawfully exercise its duties under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 3.12. As a starting point in exercising its legal duties, the Council must be clear on the degree of harm caused to heritage assets. As set out above, both the OR and Ms Chakraborty’s report contain a number of omissions and inconsistencies that mean it is impossible for members to properly understand and undertake this assessment.
- 3.13. There is a lack of clarity in the OR on the public benefits that can be weighed against the heritage harm. Paragraph 10.42 sets out a list of points which officers consider to constitute public benefits to be weighed in the balance.
- 3.14. However, these matters have not been properly quantified to enable members to undertake the balancing exercise. For example, reference is made to a new Library and Learning Centre. It is unclear whether officers have weighed the minimum size proposed in the Development Specification of 500 sqm or the maximum size of 3500 sqm. There is a significant difference in the public benefit to be provided by a 500sqm building compared to a 3500 sqm building. The Heads of Terms for the S106 Agreement under item 7 simply refer to a new “Library and Learning Centre in accordance with the parameters of the development specification”. Given the scope of the development specification this provides no assistance to members on the actual nature of the building that will be provided.

- 3.15. The list of public benefits also refers to a number of generic matters such as “supporting and creating new jobs” and “creation of new affordable workspace”. However, this list of benefits does not provide any proper context for members to assess the weight they should be given. To make this assessment it is necessary to understand that the High Road West Application could result in a loss of employment floorspace within the area and a material loss of jobs on-site – these alleged public benefits need to be considered in this context.
- 3.16. Finally in paragraph 29.6 officers conclude that the heritage harm caused by the High Road West Application constitutes “a clear reason for refusal”. To reach such a conclusion officers must have considered that the harm caused to heritage assets was not outweighed by the public benefits in accordance with the requirements of paragraph 202 of the NPPF. This is in direct conflict with the conclusion in the heritage section set out in paragraphs 10.43 and 10.45 of the OR.

#### **4. RELIANCE ON FUTURE RESERVED MATTERS APPLICATIONS AND CONSISTENCY IN DECISION MAKING**

- 4.1. In numerous places the OR seeks to advise members that issues identified can be addressed through the approval of future reserved matters applications and/or the discharge of conditions or planning obligations – for example in respect of crowd safety, townscape and heritage matters.
- 4.2. As a starting point, members need to be clearly advised that at the reserved matters stage they will have limited ability to refuse an application that complies with the parameter plans, the design codes and the development specification. For example, the Council will be unable to require the developer to provide an increased amount of employment or community space on a specific plot beyond that provided for in the development specification. Likewise, it will be unable to limit the scale of an proposed building that complies with the parameter plans.
- 4.3. This is also relevant to the consideration of detailed development management issues and policy compliance – for example in respect of the proposed open space provision.
- 4.4. The OR deals with the Open Space provision within the High Road Application at paragraphs 6.16 to 6.26. As set out in our earlier representations, it is a core principle of public law that decisions must be taken on a consistent basis – see for example *Fox Strategic Lane and Property Limited v Secretary of State for Communities and Local Government* [2013] 1 P.&C.R.6. Furthermore, when considering the High Road West Application, the Council’s refusal of THFC’s application for the Goods Yard and the Depot sites (HGY/2021/1771) is a material consideration to which the Council must have regard – see for example *R. (on the application of Rank) v East Cambridgeshire DC* [2003] J.P.L. 454. In order for the Council to lawfully determine the High Road West Application it must have regard to not simply the fact of the refusal of the THFC application but the reasons for it – see for example *R (oao Havard) v South Kesteven District Council* [2006] J.P.L. 1734.
- 4.5. Whilst the OR acknowledges that THFC’s current appeal scheme was refused by the Council due to the lack of provision of Open Space, it misleadingly seeks to distinguish the High Road West Application.
- 4.6. In the case of THFC’s appeal scheme, the Council refused permission and in turn advanced its case at the public inquiry, based on a strict application of policy DM20 and a failure to meet the requirements for open space set out in the Council’s Open Space and Biodiversity Study (2013).

- 4.7. The OR acknowledges that the High Road West Application provides only 33% of the required Open Space provision as against the DM20 requirements, based on a “worst case” scenario and 45% based on a “best case scenario”. In contrast, the Council considers that the THFC appeal scheme provides over 50% based on the same comparison – i.e. 5% more than the best case scenario in the High Road West Application.
- 4.8. It is also important to note that the OR appears to take into account areas such as roadways which were specifically excluded from the calculations in the THFC scheme. In essence it appears the Council have included any ground not covered by a building as being open space. Such an approach is not compliant with any lawful interpretation of the relevant open space policies. Unless the OR is updated to spell out precisely how this issue has been treated, it will at the very least, mislead members.
- 4.9. Whilst THFC does not agree with the Council’s approach – the Council must apply it on a consistent basis.
- 4.10. The OR seeks to distinguish the High Road West Application on the basis that as the application is outline and “additional public open space can be delivered as part of the detailed design of the parcels of future development” (para 6.22)
- 4.11. Paragraph 6.24 of the OR records that it is proposed to impose a condition to require reserved matters application to seek to comply with Policy DM20 or any successor policy “thus ensuring compliance with policy.....”(emphasis added).
- 4.12. Draft Condition 43 provides that: “For the avoidance of doubt, any future reserved matters submission shall be supported by an Open Space Assessment addressing the requirements of Policy DM20 of the Development Management DPD 2017 or any successor policy”
- 4.13. The stated reason for the condition is “To ensure an appropriate level of publicly accessible open space is provided within the area of identified deficit and in accordance with Policy DM 20 of the Development Management DPD 2017”.
- 4.14. The clear advice to members is that the imposition of the condition can ensure compliance with policy DM20 and by implication meet the requirements of the 2013 Open Space and Biodiversity Study.
- 4.15. However, paragraph 6.24 goes on to state that “the policy conflict is considered to be outweighed by the substantial benefits the scheme delivers”. Members are therefore provided with conflicting advice as to whether the scheme will comply with DM20 or not.
- 4.16. Furthermore, the condition does not ensure the delivery of any particular level of open space let alone more than the 45% recognised as the currently achievable maximum. All it requires is for an assessment to be produced, that does not guarantee any outcome it is entirely plausible that the outcome of the assessment is no further open space can be provided.
- 4.17. In any event members need to be clearly advised on the realistic likelihood of the scheme being able to achieve strict compliance with policy DM20. Paragraph 6.18 of the OR records that the Open Space Study would require the provision of 10.51 hectares of open space as part of the scheme. Given that the entire site is only 8.5 hectares it is impossible to achieve 10.51 ha of open space.

- 4.18. Likewise given the size of the proposed building plots, the scheme will be unable to provide materially more open space provision than that identified in the “best case” scenario in paragraph 6.19. As set out above this equates to only 45% of the required provision.
- 4.19. No assessment has been undertaken to suggest that it will be possible to deliver more than 45% of the requirement let alone match the level provided by the THFC scheme – which the Council considered warranted refusal of that application on open space grounds.
- 4.20. Even if materially more open space were to be provided, no assessment has been undertaken on the impacts of such proposals on the remainder of the scheme – either in terms of viability or in terms of the delivery of public benefits on which officers rely to offset the harms caused by the application. Any material increase in open space can only result in a reduction in the quantum of built development. This has not been factored into officers’ analysis.
- 4.21. On this basis the reliance on Condition 43 would be unlawful as there is no realistic basis on which a policy compliant quantum of open space (based on the Council’s interpretation in respect of THFC’s appeal scheme) can be delivered.
- 4.22. If, in the alternative, it is suggested that Condition 43 would not require a strict application of the standards in the Open Space Study (and therefore Policy DM20) then the Council is adopting an entirely inconsistent approach to the basis on which it refused THFC’s application and has subsequently advanced its case on appeal. As we have repeatedly stated to the Council, this inconsistent approach is a clear legal error.
- 4.23. A further example of the Council’s inconsistency relates to the approach taken to the number of single aspect units comprised within the High Road West Application, and in particular north facing single aspect units.
- 4.24. The OR reports that “Most of the proposed homes are envisaged to be dual aspect. The majority of single aspect dwellings would be east and west facing”. However this assessment is reliant on treating corner aspect units as dual aspect. In respect of THFC’s appeal proposals the Council has maintained that such corner units should be considered as single aspect. Again, the Council must adopt a consistent approach.
- 4.25. We note that officers appear to have reached the conclusion that the harm caused by the height of Block F is unacceptable. The application parameters proposed up to 27 storeys whereas paragraph 6.56 has identified that this should be reduced to 15 storeys. We note in passing that Condition 39 itself only proposes to limit the height of Block F1 to 20 storeys.
- 4.26. Whether Block F is reduced to 15 or 20 storeys it represents a materially different scheme to that has been assessed in the application documentation. In turn, no analysis has been undertaken of the impact that such a reduction would cause in the viability of the scheme and to the delivery of identified public benefits that are relied upon in the overall planning balance.

## **5. APPROACH TO ASSESSMENT AND WEIGHING OF PUBLIC BENEFITS**

- 5.1. As set out in our previous correspondence and in light of the failure by the applicant to provide greater commitment and certainty on the composition of the scheme, given

the extreme degree of flexibility sought in both the potential scale of development and the allocation of uses across the site, it is impossible for the Council to properly and lawfully assess the likely significant environmental effects of the development for the purpose of the EIA Regulations (R v Rochdale MBC Ex p. Milne (No 2) [2001] Env.L.R.22.

- 5.2. The Council commissioned several peer reviews of the submitted Environmental Statement and addenda. These reviews identified numerous concerns with the approach adopted. For example, WSP comment that “the information provided is very difficult to interpret given its volume and lack of focus on pertinent issues, aside from the general confusion about different development scenarios”. The concerns of the peer reviewers and issues identified as part of this process have not been properly explained to members.
- 5.3. Likewise, the OR does not set out clearly for members the approach officers have taken to the weighing of the purported public benefits of the scheme. For example, in respect of the provision of employment space, nowhere is it made clear that the scheme could result in a loss of employment floorspace and a loss of jobs on-site – yet the proposed employment benefits of the scheme are put forward as a benefit of the scheme.
- 5.4. In its case in respect of THFC’s current appeal, the Council’s has maintained that to assess an outline application it is necessary to assess the “worst case” scenario based on the maximum proposed parameters of development.
- 5.5. In a number of places, the OR sets out an inconsistent approach to this analysis – on occasions focusing on the illustrative scheme rather than the maximum parameters. Section 3.3 sets out a long explanation of the illustrative scheme but the following analysis is selective. For example, paragraph 3.8 only sets out the density and open space calculations based on the illustrative rather than the maximum parameter scheme. In the maximum parameter scheme a total of 14.67 sqm of open space would be provided per home rather than the figure of 16.2 sqm cited in paragraph.
- 5.6. The stated density figures at paragraph 4.42 have not been calculated to reflect the proportion of non-residential space – which could take the figures close to 400 homes per hectare. Furthermore, the figure provided for the THFC appeal scheme for comparison purposes is 353 homes per hectare but that is based on a net site area. The comparison in paragraph 4.44 is therefore highly misleading and must be clarified.
- 5.7. The Addendum to the Environmental Assessment sets out a specific assessment “scenario” where the southern phase (being that part of the scheme south of White Hart Lane) is brought forward on its own. However, there is no analysis or assessment in the OR of the overall planning balance of such a “scenario”. For example, in respect of density matters, the proposals south of White Hart Lane could exceed 400 homes per hectare. Nowhere in the OR do officers set out any assessment of the southern phase being delivered alone. This is important as an assessment of the scheme in open space, density, heritage and public benefits, will be very different if considered based on the southern phase alone.

## 6. **BALANCING EXERCISE**

- 6.1. The OR has failed to correctly apply the decision making policies of the NPPF. At 29.4 the OR correctly states that the tilted balance is engaged due to the lack of a 5 year housing land supply (albeit it incorrectly states that this is due to ‘a limited shortfall’).

At 29.6 the OR then states: “29.6 *In this case, the impact on designated heritage assets, subject to design detailing, has the potential to result in an upper level of ‘less than substantial harm’, with the value of the Conservation Area having already been eroded irrevocably as a result of the stadium development. It is therefore considered that this impact provides a clear reason for refusal for the purposes of Paragraph 11d(ii).*”

- 6.2. In order to have reached this conclusion officers must be of the view that the balancing exercise at paragraph 202 of the NPPF had not been passed. Accordingly, the tilted balance is disengaged because a clear reason for refusal exists. Where there is a clear reason for refusal arising from the application of policies contained within the NPPF, in this instance the heritage policies, then the correct approach is to refuse planning permission. Not carry out some separate, further balancing exercise, as the NPPF has already dictated that planning permission should be refused.

## **7. DEPARTURE FROM THE DEVELOPMENT PLAN**

- 7.1. The OR at paragraph 30.1 expressly acknowledges that the High Road West Application departs from the Development Plan in a number of respects.
- 7.2. Given this conclusion the High Road West Application constitutes “development outside town centres” for the purpose of the Town and Country Planning (Consultation) (England) Direction 2021 as it is development to be carried out in an “edge of centre” location (as defined), is not in accordance with one or more provisions of the development plan (as acknowledged in the OR), and includes the provision of a building or buildings of 5000 sqm or more.
- 7.3. On this basis the Council is required to refer the application to the Secretary of State in accordance with the requirements of paragraph 10 of the Direction. This requirement is not set out in the recommendation to members in the OR.

## **CONCLUSION**

THFC has set out its fundamental concerns regarding the design and composition of the High Road West Application repeatedly in previous correspondence.

It is concerned that the Council is not adopting a consistent approach to the determination of the High Road West Application compared to its approach to THFC’s recent application for the Goods Yard and Depot sites that is currently at appeal. All three of the Council’s stated reasons for refusal of THFC’s application, and the case it has advanced on the appeal, apply with equal if not more force to the High Road West Application.

As is clear from the OR, it appears that the Council’s determination of the High Road West Application is being driven primarily by considerations relating to the availability of grant funding rather than a proper application of its statutory duties under the Town and Country Planning Act 1990 and the Planning (Listed Buildings and Conservation Areas Act 1990).

THFC is concerned that officers have not given proper consideration to the numerous objections raised not just by THFC but by numerous local residents and businesses. This is illustrated in the evidence of Mr Reynolds in respect of THFC’s current inquiry who indicated that the High Road West Scheme would be written up for approval in his proof of evidence – notwithstanding that his proof of evidence was produced in advance of the expiry of the most recent consultation period for the High Road West Application. For consultation to be lawful it must be meaningful; *R v N E Devon HA ex p Coughlan* [2001] QB 213 as per

Lord Woolf MR at [108]. The courts are clear that the product of consultation must be “conscientiously taken into account when the ultimate decision is taken”. Given the Council were proposing to approve the High Road West Application before the consultation period had finished they have demonstrably failed in this regard.

For the reasons set out above THFC maintains that Council is not in a position to lawfully determine the High Road West Application and that its approach to defer consideration of matters of principle to the approval of reserved matters, conditions and planning obligations is unlawful.

Yours sincerely

A handwritten signature in black ink, appearing to read "Richard Max" with a stylized flourish at the end.

**RICHARD MAX & CO**