

July 2023

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

Objection by Tottenham Hotspur FC and Alternative Masterplan

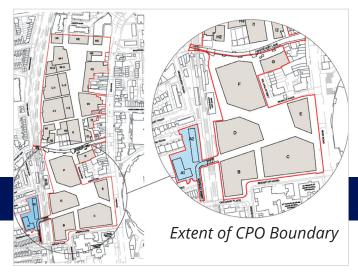




Introduction & Context

Haringey Council has made a Compulsory Purchase Order (CPO) on land generally bordered by White Hart Lane to the north; the High Road to the east; Brereton Road to the south; and the railway to the west.

The CPO is based upon a planning permission granted to Lendlease in August 2022 across a wider area that includes land to the north of White Hart Lane.



HRW PP Development Zones



HRW PP Illustrative Masterplan

The CPO will be considered by an independent inspector at a public inquiry starting on 7 November 2023. The inspector will hear evidence from Haringey Council (as the acquiring authority) and objectors and decide whether or not to confirm the CPO.

THFC is one of a number of parties who have objected to the CPO and we have objected on the following grounds:

- i. The purpose for which the land is proposed to be acquired is inconsistent with the Local Plan for the area;
- **ii.** The purported economic, social and environmental benefits are overstated and there is a real prospect that many will not actually be delivered;
- **iii.** The is no evidence that the CPO scheme is viable and there is a real risk that it will not be delivered;
- iv. The planning permission underlying the CPO scheme is currently subject to challenge pursuant to a claim for judicial review and, if successful, the absence of planning permission represents an impediment to delivery;



- V. The CPO scheme will give rise to unacceptable safety impacts to visitors attending the Tottenham Hotspur Stadium; and
- vi. High Road West could be developed in an alternative way, that would be fully consistent with the Local Plan deliver far greater economic, social and environmental benefits, and be more acceptable in safety terms.

To substantiate ground (vi) THFC has produced an 'Alternative Masterplan', which THFC wishes to consult with the local community and stakeholders upon. That is the purpose of this document.

This document sets out the base material that is intended to be used in the ongoing stakeholder engagement and community consultation. The collateral used will vary from one stakeholder to another in emphasis, but the base information will remain the same.

The Alternative Masterplan is not a planning application but a means of demonstrating to the inspector that there is a much better way of achieving the purposes of the CPO than the Lendlease scheme on which it is currently based.

It is also important because unlike the Lendlease scheme which drew in more than 250 objections from residents and businesses, THFC would prefer to see the regeneration of High Road West brought forward with a consensus of community support and true to the original vision and objectives set out in the Council's own Tottenham Area Action Plan.

THFC also has permission to challenge the Lendlease planning permission through a judicial review. THFC does not believe that Haringey Council properly considered important matters such as crowd safety and the impact of scheme on Tottenham's heritage assets when determining the Lendlease planning application. The judicial review hearing is due to take place in the Autumn around the same time as the CPO inquiry. If the judicial review is successful, the judge may 'quash' the Lendlease planning permission and the planning permission on which the CPO is based would no longer exist.

THFC would prefer to collaborate with Haringey Council to deliver the Alternative Masterplan.



The Lendlease Scheme

Missed Opportunities

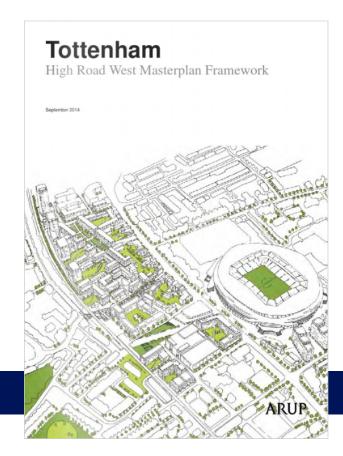
High Road West concept was part of the public and private sector response to the riots of August 2011. There is a sequence of documents that provide a clear basis for the regeneration of High Road West with a golden thread that seeks to avoid repeating the mistakes of the past that contributed to those riots.





The Mayor of London's It Took Another Riot report highlighted that Tottenham suffered from many interconnected social and economic problems and that both the social and physical aspects of any regeneration proposals needed careful consideration.

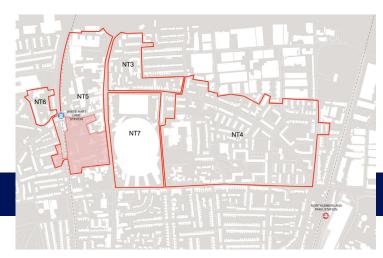
The report's vision and recommendation focussed not just on the provision of new housing but crucially on the need for employment, education and cultural and leisure improvements. It was against the background of the report that the objective of the HRWMF and TAAP to create a new leisure destination for London emerged.





The Tottenham Area Action Plan (July 2017) remains the most important part of the development plan for the purposes of bringing forward a regeneration scheme for HRW.





Tottenham Area Action Plan (AAP) Development Plan Document (DPD) - Neighbourhood Areas

The purpose for which the land is proposed to be acquired is inconsistent with the TAAP as it does not deliver "a new leisure destination for London" as part of a "comprehensive development creating a new residential neighbourhood". (TAAP, p102)

The regeneration scheme that underpins the CPO should derive from that sequence of documents. It does not.

The HRWMF set out principles for phasing and implementation and states that development in HRW must minimise disruption to the local community and demonstrate how each phase of delivery can create a 'complete' state at every stage of its development.

The HRWMF shows Moselle Square as an early phase of development along with the Goods Yard and Depot site (which are in the ownership of THFC). This indicates early delivery of Moselle Square which is important for place making and ensuring the continuing safe operation of the THFC stadium. By contrast, the planning permission underpinning the CPO shows Moselle Square as Phase 3 and would be the last component to be completed around the year 2032.

The Lendlease planning permission commits to just 500m2 of dedicated leisure uses (indoor sports, recreation, fitness), representing just 0.2% of the minimum floorspace of what is permitted. It is clear that the permitted scale and composition of leisure uses would not come close to delivering a new leisure destination for London to complement existing provision (including the Tottenham Hotspur Stadium).



The Lendlease Scheme

Overstatement of Benefits

The Council's Statement of Reasons claims that the scheme underpinning the CPO will deliver the following benefits:

- 1350-1665 new homes
- A new public square
- A new library and learning centre
- A new GP surgery
- 89 FTE net additional jobs in retail, leisure, hospitality, catering and other services
- A District Energy Network

However due to the structure of the Lendlease planning permission and associated Section 106 Agreement (together with the lack of clarity and transparency regarding the terms of the underlying Development Agreement), it is far from certain that all of these benefits will actually be delivered.

As the CPO only relates to that part of the Lendlease planning permission south of White Hart Lane:

- It delivers significantly fewer economic, social and environmental benefits than were assessed and balanced at the planning application stage.
- The scheme is unbalanced because there is no certainty that essential components of the overall scheme which have been granted planning permission will be delivered. This includes the new public park (Peacock Park) to the north of White Hart Lane, an essential community asset in an area of open space deficiency. Without it the new residents would have to rely largely on Moselle Square (a very different civic square) – and as set out above there is no certainty that Moselle Square itself will be developed.
- The planning application process didn't consider or assess important planning considerations including the housing mix, affordable housing viability and open space just for land south of White Hart Lane.

The benefits of the CPO scheme put forward by the Council have therefore been overstated.



There Is A Better Approach





"We see regeneration as bringing hope, prosperity and uplift to Tottenham, embracing the local community, building on the character and talents of the area. Our vision is that our neighbourhood is a prosperous mixed community. If you live here you should be able to study, work and play here.

We want to change the prospects for those that live in this part of London and see our developments, starting with our new stadium but including everything we build in Tottenham, as a catalyst for its regeneration.

That is why we have delivered new, affordable homes, schools, shops and jobs alongside our stadium and embedded our Foundation onto the High Road.

Unlike any developer, we are not here to develop, take a profit and leave – we are here for the long-term. This is our home."

Daniel Levy

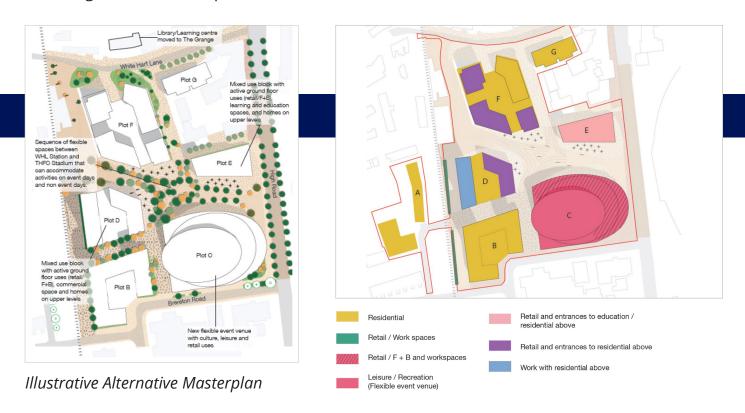
Chairman, Tottenham Hotspur Football Club





Our Alternative Masterplan

THFC has retained ARUP – as the original HRWMF masterplanners – to produce an Alternative Masterplan that does deliver the TAAP objectives and does not repeat the mistakes previous, failed regeneration attempts.



The Alternative Masterplan has been prepared in conjunction with THFC's own Northumberland Development Project ("NDP"), which in addition to the already completed Tottenham Hotspur Stadium; Lilywhite House; and Tottenham Experience, will deliver a 180 bed hotel; 585 new homes; and further leisure and education uses. The NDP, which also derives from the TAAP, represents an investment of more than £1bn by THFC in Tottenham.

The Alternative Masterplan has been prepared in full cognisance of the community opposition to the Lendlease planning permission upon which this CPO is based. It also addresses fundamental concerns about the Lendlease planning permission, particularly in relation to crowd safety and phasing.

By reconfiguring and enlarging Moselle Square, major event day queues for White Hart Lane station can be better managed and the need to close White Hart Lane reduced.

The Alternative Masterplan takes account of the Tottenham Hotspur Stadium being one of the host venues for the UEFA European Football Championships in 2028. The winning host country will be announced in October 2023. The Lendlease planning permission upon which the CPO makes no provision for the event.



Our Alternative Masterplan

The Alternative Masterplan contains higher education floorspace, reflecting ongoing commercial negotiations between THFC and one of London's major universities in respect of the need for both teaching space and student accommodation, the latter of which will be delivered at THFC's Printworks site (819-821 High Road).

The Alternative Masterplan has been prepared in conjunction with a leading theatre operator with whom THFC has an agreement to seek to deliver a new multi-purpose cultural venue ("the venue").

THFC understands the importance of housing delivery in Tottenham. The Alternative Masterplan ensures that any housing displaced by non-residential uses such as the multi-purpose cultural venue and the higher education floorspace are accommodated within THFC's approved Goods Yard Depot scheme.

By linking the Goods Yard Depot scheme with Alternative Masterplan, housing delivery can be accelerated and Moselle Square brought forward from the last to one of the first phases of development, thereby meeting the requirements of the HRWMF and basic placemaking principles.





New Multi-Purpose Cultural Venue

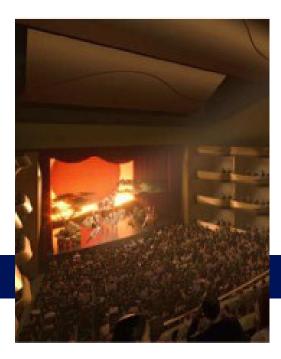
The venue is being designed by Populous who were the architects of the Tottenham Hotspur Stadium and one of the World's leading entertainment venue architects.

The venue will deliver a world class programme of live entertainment in Tottenham. It will:

- · advance the vision for North Tottenham as a "premier leisure destination for London";
- place arts and culture at the heart of future developments surrounding the Stadium; and
- complement the existing supply of venues in Tottenham and Haringey.

We have identified great potential for the venue to deliver strategic benefits to Tottenham. These benefits are expected to flow principally from the following:

- improved image and wider regeneration benefits;
- contributing to the growth of the creative sector;
- supporting place marketing and inward investment;
- education, wellbeing and community impacts;
- activating the surrounding public realm and the High Road, especially in the evening; and
- attracting additional footfall and spend to the wider area.







In Summary

Deliver at least as many homes as the Lendlease scheme

Accelerate the delivery of those new homes

Ensure no existing residents need to move more than once

Accelerate the delivery of Moselle Square thereby bringing forward the heart of HRW and all the placemaking benefits it will bring

Create a reconfigured and enlarged Moselle Square with more space for major event day queues Introduce a new multipurpose cultural venue that will bring a World-class programme of arts and culture to Tottenham, whilst complementing Haringey's existing offer

Advance the vision for North Tottenham as a "premier leisure destination for London" Create a wider and greater number of employment and training opportunities for local people

Increased footfall for traders on non-football event days



