

21 November 2023

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

Dear Sir/Madam

We write further to the letter to the Secretary of State for Levelling Up, Housing and Communities dated 7 March 2023 in which Richard Max & Co objected to the Order ("the Objection") on behalf of Canvax Limited, Goodsyard Tottenham Limited, Meldene Limited, Tottenham Stadium Limited, Paxton 17 Limited, Stardare Limited and High Road West (Tottenham) Limited) ("THFC") in relation to the acquisition of land and rights over land that THFC has an interest in.

The Objection contained a number of grounds of objection, including that the Scheme "will give rise to unacceptable safety impacts to visitors attending the Tottenham Hotspur Stadium" (the "Crowd Flow Objection").

On 31 October 2023, Richard Max & Co confirmed that in the event certain assurances could be provided by the London Borough of Haringey (the "Council") and Lendlease (High Road West) Limited ("Lendlease"), THFC would withdraw its Crowd Flow Objection.

Condition 64 of planning permission (ref: HGY/2021/3175) dated 31 August 2022 ("**Planning Permission**") was imposed to provide a mechanism for approving detailed crowd flow arrangements for both the construction phase and end use of the development.

Condition 64 is to be read alongside the obligations within Schedule 13 of the Section 106 Agreement dated 31 August 2022 which require Lendlease to grant or procure the grant of access across the development in order to facilitate crowd flow on event days.

However, in order to facilitate the removal of the Crowd Flow Objection, Lendlease hereby provides in its capacity as the development partner to the Development Agreement dated 20 December 2017 the assurances within the below "Schedule of Assurances" for the benefit of THFC.

The below terms are defined as follows for the purpose of the assurances:

Event – means an event at Tottenham Hotspur Stadium with greater than 10,000 spectators.

Event Days – means a single day on which an Event is to be held.

Phase A – means the development within phases 1B, 2, 3, 4, 5, 6 and 7 on the attached plan.

Route(s) – means access and space for visitors to the Tottenham Hotspur stadium across Phase A on Event Days as approved, pursuant to Condition 64 of the Planning Permission.



General

- In the event of any conflict between the assurances and the requirements and/or requests of the Local Planning Authority in relation to Condition 64 of the Planning Permission the requirements and/or requests of the Local Planning Authority shall take precedent over the assurances.
- 2. For the purpose of the assurances the existing crowd flow routes are to be treated as they currently are, including in respect of existing street furniture, barrier widths, crowd flow route widths and other dimensions.
- 3. The proposed minimum crowd flow widths of a Route apply only to such part of a Route which is newly created and do not apply to any part of a Route which comprises part or all of the existing crowd flow route. Furthermore, the minimum crowd flow routes are based and will remain based on gueue barrier footings of 0.7m.
- 4. The assurances assume that those parts of a Route which form part of the adopted highway will be available for crowd flow on the same basis as existing, save in respect of any sections which have been temporarily or permanently stopped up in order to facilitate or enable the construction of Phase A.
- For the avoidance of doubt, the assurances do not provide a right of access across Phase A to facilitate crowd flow management. The necessary rights of access will be granted subject to a separate agreement pursuant to the terms of the Section 106 Agreement dated 31 August 2022.

SCHEDULE OF ASSURANCES

QUEUE FOOTPRINTS AND WIDTHS

- 1. During construction of Phase A and once completed, the queueing area available for the Southbound queue for White Hart Lane Station on Event Days shall be at least 1,148m² in total comprising:
 - a. Formal Southbound queue area of 780sqm excluding any area taken by the footings of the barriers to demarcate the queuing area;
 - b. 128m² circulation space between the Southbound queue and the two eastern entrances to White Hart Lane Station; and
 - c. A contingency queueing space of 240m².
- 2. During construction of Phase A and once completed, space should be available on Event Days to enable the Southbound queue for White Hart Lane Station to be provided with a width of at least 3.6m excluding the footings of barrier lines used to demarcate the queue line.
- 3. During construction of Phase A and once completed, at least 1,268m2 of space should be available on Event Days for the Northbound queue for White Hart Lane Station from the High Road to White Hart Lane Station with space available for a minimum queue width of 1.5m.



- 4. Space should be provided to facilitate a contraflow lane of at least 1.4m width on Event Days.
- 5. The minimum areas and widths set out above may need to increase to provide for further circulation capacity for evacuation in the event of emergencies in areas adjacent to hoardings.

CIRCULATION AND ACCESS

- 6. Construction hoardings relating to the construction of Phase A shall not encroach onto the pavements of active crowd flow Routes, for example at: Whitehall Street, Love Lane, White Hart Lane or the High Road (with the exception of the sections of public highway to be permanently stopped up, or where specific construction related activities could not be reasonably completed without the construction hoardings encroaching on to the pavements) but in any event, the minimum widths stated within the assurances above shall generally be available for visitor egress and ingress for pedestrian circulation during event days at the Tottenham Hotspur Stadium.
- 7. The Routes between the Tottenham Hotspur Stadium and White Hart Lane Station which do not form part of the public highway shall be provided as semi-permanent routes and be open to the public on both event days and non-event days (subject to closures (on non-event days) for construction related activity, such as scaffold erection, crane lifts, utility works etc).

PROVISION OF TOILETS

8. A minimum 60sqm for temporary event toilets and an additional minimum of 62sqm for a toilet servicing area shall be provided on Event Days. The precise location of the two areas shall be discussed between Lendlease and THFC. The parties note that the toilets should be accessible to spectators before entering the formal barriered part of the Southbound queue to White Hart Lane Station and servicing can be accommodated during the middle of the event without the need to move barriers.

HOARDINGS

 During construction of Phase A there should not be any sections of double-sided hoardings along any of the Routes exceeding 50m save in exceptional circumstances and with appropriate mitigation measures in place.

SAFETY AND SECURITY

- 10. Within the boundary of Phase A, Lendlease will work with THFC to design the permanent Hostile Vehicle Mitigation to be incorporated within Phase A such design to allow for effective crowd flow.
- 11. Each Route shall provide for suitable emergency service access points.

LIGHTING

12. Appropriate lighting (with LUX levels to be agreed by the Local Planning Authority) shall be provided along the Routes.



PROVISION FOR ENGAGEMENT

- 13. The design for each Route to be submitted for approval pursuant to Condition 64 shall be prepared in consultation with THFC in a multi-agency environment beginning three months before submission of each respective Interim Crowd Management Plan and the Final Crowd Management Plan pursuant to Condition 64. This process shall include:
 - a. Joint regular meetings to develop and present risk assessments for crowd safety and security (including emergency evacuation routes and capacities);
 - The provision of the quantum and geometry of space available for the queue system arrangements, together with escape routes, shall be reviewed by THFC and the Metropolitan Police CTSA, as key operators and risk holders for safety issues; and
 - c. The presentation of design drawings to the Safety Advisory Group before submission of any application to discharge Condition 64.

Signed:

Peter Leonard

Yours faithfully

Chief Operating Officer, Lendlease Development

for and on behalf of Lendlease (High Road West) Limited

Date: 21 November 2023

