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From: Planning Support
Subject: FW: Comment Received from Public Access

Application Reference No. : HGY/2015/3000 Site Address: Tottenham Hotspur Football Club
748 High Road London N17 0AP London Comments by: Our Tottenham

Submission: Objection

Comments: Comments on Application HGY/2015/3000 located at Tottenham Hotspur Football Club
748 High Road, London, N17 0AP

Submission on behalf of the Local Economy Group of the Our Tottenham network.

The Our Tottenham network brings together 40 key local community groups, projects and campaigns standing up for the interests of people in Tottenham, especially around planning and regeneration issues (http://ourtottenham.org.uk/?page_id=31). We work together to fight for our neighbourhoods, our community facilities and the needs of our communities throughout Tottenham. This response, formulated by the Local Economy Group, is based on the principles embedded in the Community Charter for Tottenham agreed by the Our Tottenham network on 6 April 2013 (available here: <http://ourtottenham.wordpress.com/community-charter/>). This was followed up by a Community Planning for Tottenham conference in February 2014.

History of stadium-led regeneration schemes

The history of stadium-led regeneration schemes is older in the USA and consequently there is a much deeper evidence base of the claimed benefits for such projects.

The issue of stadium development has become centred on whether the claimed economic benefits flow from state subsidies provided to sports franchises through the building of new sports stadiums. Numerous researchers have examined the relationship between new facilities and economic growth in metropolitan areas in the USA, see: Baade & Dye, 1990; Rosentraub & Swindell, 1993; 1996, Noll & Zimbalist, 1997 . In each case, independent analysis of economic impacts made by newly built stadiums and arenas has uniformly found no statistically significant positive correlation between sport facility construction and economic development (Siegfried & Zimbalist, 2000) . This can be contrasted with the claims of teams and leagues, who emphasize the large economic benefits of professional franchises merit significant public expenditures on stadiums and arenas, (Matheson, 2002)

The OT Network believes that the {stadium-led regeneration} does not deliver broad community benefit or that the larger stadium will enable it to {host a wide range of community activities}. There has not been any genuine participation with local stakeholders to promote and develop sporting facilities.

In general terms the aim enshrined in the approach to planning in Tottenham - by the London Plan, the Upper Lee Valley Opportunity Area Planning Framework and the Area Action Plans for Tottenham that Haringey Council has recently consulted on - of attracting new investments, new residents, new businesses and new development to Tottenham should not be done at the expense of the existing community, i.e. by displacing local residents and local businesses; and it should actually improve the lives of existing residents (by creating jobs which locals can access and developments which generate true and significant benefits or facilities accessible to the community).

We wish to draw attention to the way in which existing businesses lying within the development areas in North Tottenham, including the area around the proposed new stadium have been ignored and dismissed by local plans and development proposals. We fully support the work of the Tottenham Business Group to try to redress this.

Plans drawn up by Arup, linked to the Tottenham stadium development in High Road West, involve the displacement of existing businesses and social housing. Options which could have prevented the displacement of existing businesses were presented by the developer Arup, but rejected by Haringey Council. Plans for the High Road West Scheme in Tottenham would demolish the existing Peacock Industrial Estate that contains numerous small and medium business enterprises.

We strongly recommend the following:

1. That commitments to work with existing residents and businesses by the Mayor and the local authorities are strengthened to prevent damaging outcomes. For example, in Tottenham, over 2000 jobs have already been lost with the demolition of large industrial estates in Northumberland Park. Plans for the High Road West Scheme in Tottenham would demolish an existing industrial estate, described by the Tottenham Business Group in their response to the Tottenham Area Action Plans (AAPs) consultation as 'one of London's workshops', resulting in the loss of 200 jobs, as well as 'the loss of manufacturing and industrial units that could provide valuable skilled training and apprenticeships for our local youth'. In this instance, the planning framework associated with this 'stadium-led regeneration' seems to offer insufficient protections for existing employment land, risking its destruction through developments that do not recognise or value existing economic activities. In relation to High Road West, the Tottenham Business Group point out that 'The jobs, the training and the varied established units of Peacock Estate and its surroundings could not be replaced elsewhere. Such proposals as part of 'stadium-led regeneration' do not 'deliver a genuine regeneration legacy for local communities'.
2. That the Mayor and local authorities prevent the loss of existing community assets. These would include public houses, libraries, markets, community centres, etc, which also fulfill social and economic roles.
3. That strong contractually obliged claw-back provisions are inserted in to any agreements with private companies over public money put in to 'stadium-led regeneration' schemes if the stadium, football club or any associated company is sold.
4. That the Mayor follows the recommendation of the previous GLA study on London football stadiums to ensure that football clubs adopt an open book policy with the local and regional planning authority throughout an application.
5. Due to the massive impact stadium development has on the local surrounding communities, and the wealth of modern clubs (especially those in the top divisions), ensure that the maximum 'planning gain' agreements are secured for the benefit of the existing communities.
6. A series of pre-requisites to developing stadia for the benefit of communities and football clubs were put forward by Brown et al. in their 2006 report for the Football Foundation. It was stressed that football clubs need to minimize the negative effects of events at the stadium on local communities. As a minimum, clubs need to have in place means of regular consultation, problem solving and decision making to overcome difficulties suffered by local residents. These could include:
 - Local steering groups, incorporating club, local authority, residents representatives, local business groups, agencies (such as transport).
 - An active and meaningful involvement in decision making by local community representatives and other residents and businesses ' as well as supporter communities - facilitated by the football club and local authorities

- Developments designed with local communities to meet their needs, as well as other parties such as clubs.
- Regular and accurate information sharing about developments, plans and options.
- Independent monitoring of community involvement in developments.
- Regular open/public consultation meetings.
- Stadium open days
- A defined member of staff able to tackle issues for local residents across different departments of the club.
- Outreach work, especially on match days, to observe and to make connections with local people.
- Schemes for the removal of litter.

Where football facilities are developed as part of local regeneration strategies, it must be ensured that they are accessible and useful to local people. A Community Involvement Plan could help achieve this, so long as it:

- Takes full account of what local people need, involving them in the planning and negotiations for the site.
- Ensures that playing and business requirements are balanced with the need to maintain fluid and open access to the stadium.

If distinctions between fan and resident communities were more effectively bridged, clubs and their stadia may be able to become more embedded locally. Thus participation in the decision-making process surrounding new stadia is simply the very important starting point of this process.

Support for the recommendations from the London Assembly

These recommendations are supported by the investigation and findings of the London Assembly, published in March 2015 in *The Regeneration Game*, as detailed below.

Executive Summary

If place-making is to happen, lessons from east Manchester, Wembley and The Emirates make it clear that new stadia must not occupy large land areas ; attracting growing match day crowds and swelling shareholder profits ; at the expense of the communities that host them. Feedback to our local survey shows that communities are not always opposed to stadium development. However, effective early involvement and consultation is necessary to broker stronger relations between clubs and communities.

Football clubs have a responsibility to ensure that the local community gains from a new stadium. Communities must benefit from new mixed tenure housing, and improved transport links and connections across the area. Local authorities must also capitalise on opportunities to guarantee that clubs and other incoming businesses prioritise the local workforce when sourcing new employees.

Building in these features will shift stadium-led regeneration proposals from producing limited local effects, to supporting strategic impact across the London Plan policies. That is why the Mayor should support our Stadium Charter and push for the planning framework to treat stadium applications as strategic developments.

What difference can a stadium make?

2.18. Some of the completed schemes we examined made a valuable contribution to local affordable housing. In its section 106 agreement with Arsenal FC, for example, Islington Council secured almost 50 per cent affordable housing, across approximately 3,000 new or refurbished homes delivered through the scheme.²⁹ Around Wembley Stadium, 45 per cent of the first phase of housing by developer Quintain is affordable, along with 70 per cent planned in the second phase.³⁰

Enhancing opportunities to benefit local communities 2.19. The evidence also warns of a number of risks, and the measures clubs and local authorities could take to reduce them.

Supporting local businesses

2.20. Not everyone may welcome new economic development around a new or expanded stadium. Some community groups argued that big business interests – both football clubs themselves and the chains they may attract – will squeeze out local, independent businesses. Tottenham Business Group explained the concerns of some local traders:

‘The majority of businesses are freeholders often living above their premises. We have been given no other recourse but to go [...] The High Street shops are derided as low value businesses, yet the ‘chicken shop’ run by one of the local businessmen is one of the most popular eateries on the High Road.’³¹ 2.21. Local authorities can work with football clubs to ensure that this does not happen and that locally-owned businesses benefit from stadium-led regeneration. Speaking to some traders near The Emirates, we heard that few had benefitted from any stadium ‘spill over’ effects. In their view, food and beverage outlets in the stadium’s immediate vicinity had gained most. Transport changes, such as removing ticket barriers at Finsbury Park – while a safe and useful adaptation for match days – increased problems such as drug dealing and black market trading the rest of the time, which could have a negative effect on businesses trying to trade all week.

Local people must benefit from new employment 2.22. Football clubs have a clear opportunity to address concerns around low-wage jobs. This is especially important when considering stadium-led regeneration because, as Mark Panton highlighted, ‘[stadium-led] regeneration schemes might bias local development towards low-wage jobs related jobs.’³² The Premier League recently announced the value of its TV rights had risen by 70 per cent, yet media reports suggest that none of its clubs – except Chelsea FC – pay their employees the Living Wage.³³ The LLDC reassured us that long-term operational jobs will be delivered at the Olympic Stadium: for example, security, stewards, catering, ticket sales. We welcome the agreement the E20 partnership will have with the future stadium operator, requiring the operator to use Newham Council’s employment brokerage service (Workplace), and to pay staff the London Living Wage.³⁴ London’s Premier League clubs should take the opportunity to show leadership by committing to paying their staff the London Living Wage.

Recommendation 1

In the next iteration of the London Plan, the Mayor should incorporate a Charter for stadium developments as part of amendments to the Plan. In the intervening period, the Mayor should have regard to the Charter when reviewing stadium planning applications. Local authorities should have regard to the stadium Charter in their Local Plans.

Charter for effective stadium-led regeneration Football clubs and relevant local authorities seeking to develop a stadium-led regeneration scheme should commit to:

– A clear vision and policies for place-making around the new (or expanded) stadium, including public transport connectivity and permeability between the stadium and surrounding area.

– Undertake a skills mapping exercise to assess local capacity to take advantage of new jobs. The results should inform a skills and employment strategy, including measures to prepare and upskill local communities in order that they can access the new jobs.

– Pay the London Living Wage to all stadium employees.

– Support the Mayor’s housing targets in all stadium-led regeneration schemes, where practical. Any new housing developed as part of, or around, a new stadium, should aim to be mixed tenure, to include both family and social rented affordable housing.

– Demonstrate how they have consulted with a diverse range of local community and stakeholder groups to:

– identify effective uses of the stadium scheme as a community asset; – communicate what social infrastructure will be provided; and – establish an ongoing relationship with the community.

In addition, in cases of a stadium financed or part-financed with public funds, the Mayor should:

‡ Require a community forum to be set up to involve the public and communities in a football stadium before the new venue is built. This would give communities a say on how the stadium is used, and what social infrastructure is provided.

The Our Tottenham network includes (July 2014):

Bull Lane Playing Fields Campaign / Weir Hall Action Group, Chestnuts Community Centre, Clyde Area Residents Association, Day-Mer, Defend Haringey Health Services, Dissident Sound Industry Studios, Find Your Voice, Friends of Downhills Park, Friends of Lordship Rec, Growing-In-Haringey network, Haringey Alliance for Public Services, Haringey Defend Council Housing, Haringey Federation of Residents Associations, Haringey Friends of Parks Forum, Haringey Green Party, Haringey Housing Action Group, Haringey Independent Cinema, Haringey Justice for Palestinians, Haringey Left Unity, Haringey Living Streets, Haringey Needs St Ann's Hospital, Haringey Private Tenants Action Group, Haringey Solidarity Group, Haringey Trades Union Council, Living Under One Sun, Lord Morrison Hall / Afro International, N. London Community House, Peoples World Carnival Band, Selby Centre, The Banc, Tottenham and Wood