

## TO DARE IS TO DO

Ms Josleen Ray  
Principal Planning Officer (Strategic Projects)  
Development Management  
Regeneration & Environment Department  
Enfield Council  
Silver Street  
EN1 3XE

18 April 2019



### By email

Dear Ms Ray

**Application by Broadwick Ventures Limited Ref: 19/00632/FUL  
Meridian Works, Units 4, 5, 6, 9 And 9A And Adjacent Land At Orbital Business Park 5 Argon Road  
Edmonton N18 3BW**

This letter comprises representations by Tottenham Hotspur Football & Athletic Co. Ltd. (“the Club”) in respect of the above planning application. The Club has separately made representations (via its licensing solicitors, Blandy & Blandy) in respect of three related licence applications and will be appearing at the forthcoming Hearing on 8 May 2019.

The Club notes that whereas the licence applications relate to repeated use of the application site, the planning application relates specifically to the Field Day 2019 music festival on 7-9 June 2019. These representations are differentiated accordingly.

### Context of Representations

The Club has recently opened the Tottenham Hotspur Stadium – the centrepiece and second phase of a £1bn Northumberland Development Project (“NDP”) investment in north Tottenham on the site it has occupied since 1899.

The new stadium is only 1.5km from the application site.

In addition to the new stadium, the Club has already completed a 7,500m<sup>2</sup> Sainsbury’s store and the London Academy of Excellence Tottenham (an academically selective 16-19 free school sponsored by the Club and leading independent schools including Highgate School).

The Club has so far created over 2,500 jobs (FTE) through its investment in north Tottenham and will shortly be commencing the third phase of NDP comprising a 180 bed hotel; extreme/urban sports hub; 585 homes; community health facility; and 3,500m<sup>2</sup> of commercial/community space.

The NDP benefits from a site-specific allocation (NT7) in the adopted Tottenham Area Action Plan and is also the catalyst for the regeneration of the adjoining NT3 (Northumberland Park North); NT4 (Northumberland Park); and NT5 (High Road West), upon which rests the cumulative delivery of approximately 4,200 new homes; 10,200m<sup>2</sup> of commercial/industrial uses; 21,100m<sup>2</sup> of town centre uses. The new stadium is therefore inextricably linked with the regeneration of the area around it, which still includes one of the most deprived Wards in London (Northumberland Park).

The 62,000 seat new stadium has been designed primarily as the Club's new home, but also as a multi-use venue in order to bring year round activity and inward investment to the area. The TAAP states at 2.37:

*"In North Tottenham, there is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site as a catalyst for wider change, ensuring this area becomes a hub of activity throughout the week and not just on matchdays. This can be achieved by establishing the location as a premier leisure destination for London..."*

The stadium therefore benefits from a planning permission and premises licence that allows for unlimited football matches; up to six concerts; and up to ten non-concert major events (a major event being 10,000 spectators or more for the purposes of the stadium planning permission).

The Club is a founding and ever-present member of the English Premier League since its formation in 1992/93. The Premier League is currently broadcast to 4.7bn people across 212 territories and the Club's presence therefore provides the wider area of Tottenham with a truly global profile and showcase for inward investment.

The Club's progress this season to the semi-final stages of the UEFA Champion's League will mean that on 30 April, the new stadium will host one of the highest profile club football matches ever staged in London.

Television broadcast and competition requirements are now such that the Club may be playing competitive first team fixtures on any of the seven days during a week throughout the domestic season (typically from the second week in August through to the second week in May the following calendar year). This excludes the pre-season warm-up games that normally take place in the last couple of weeks of July.

The Club also holds a ten-year contract with the NFL to stage a minimum of two NFL regular season American football games each year. On 17 April (yesterday), the Club and the NFL announced the first two games at the new stadium: Chicago Bears at Oakland Raiders on Sunday 6 October and Carolina Panthers at Tampa Bay Buccaneers a week later on Sunday 13 October.

Furthermore, the Club is also currently contracted to host a number of concerts and other non-concert major events from 23 May to 27 June 2020. By virtue of the stadium planning permission and premises licence and subject to the granting of an annual safety certificate, the Club is therefore at liberty to host all of these events and indeed will be doing so with full planning policy support.

Nevertheless, as a nearby regeneration area that will both benefit from and underpin the Club's investment in north Tottenham, the Club supports Meridian Water in principle and Enfield Council's efforts to attract new investment to the area. The Club also recognises that meanwhile uses can be an effective means of raising the profile of an area ahead of permanent redevelopment.

### **Representations**

The Club has been working with its local authority and transport partners (which include both Haringey Enfield Councils; Transport for London; Arriva Rail Limited; Abellio Greater Anglia; and the British Transport Police) to devise and then implement a stadium transport strategy that will allow the full capacity events at the new stadium to be staged on both weeknights and weekends.

That strategy has been successfully tested through two test events on 24 and 30 March and three subsequent, full capacity football matches on 3, 9 and 13 April 2019. The games on 3 and 9 April (Crystal Palace and Manchester City) were 19:45 and 20:00 kick-offs respectively. The Club and its transport partners now have a good understanding of the impact of forward and return traffic on the local area and the four stations during both weeknight and weekend scenarios.

The new stadium transport strategy is based upon extensive and validated travel demand forecasting and survey information over ten years. In addition to optimising the use of the four stations serving the new stadium (Seven Sisters, Tottenham Hale, White Hart Lane and Northumberland Park), the strategy utilises a range of additional Club-sponsored transport services such as shuttle buses to Tottenham Hale, Wood Green and Alexandra Palace stations; as well as a raft of mitigation measures, including extensive fan and background user travel demand management (in conjunction with TfL); strategic and local traffic diversions; extensive Major Event Day CPZ; and attraction and retention measures within the stadium itself.

Whilst the strategy makes full use of recently upgraded Victoria line; Piccadilly line; London Overground; Abellio Greater Anglia; and Great Northern services, there is only finite public transport capacity available. That capacity will not increase until redevelopment works at White Hart Lane and Tottenham Hale stations have been completed; new higher capacity rolling stock has been introduced on the London Overground line; and the West Anglia Mainline STAR project facilitates additional stopping services at Northumberland Park and Meridian Water stations.

**It is abundantly clear that there is insufficient public transport capacity to facilitate an event with 25,000 patrons at the application site at the same time as a full bowl event is taking place at the new Tottenham Hotspur Stadium. Furthermore, that position will not change post the completion of all of the public transport improvements listed above.**

As correctly stated in the Committee report, the Club does not currently have any major events (i.e. over 10,000 spectators) scheduled for the 7 to 9 June 2019 coinciding with the Field Day 2019 music festival.

However, even absent any major events at the new stadium, it is not clear from the application how the applicant can cater for 25,000 patrons – particularly in the return traffic given the proposed finishing times of the event. Specifically:

- Access to the platforms at Meridian Water station will need careful management to avoid overcrowding. There will need to be a queue location reservoir for the station which does not interfere with the onward route towards Tottenham Hale LUL station.
- The vast majority of the attendees will wish to travel southbound from Meridian Water station and westbound from Tottenham Hale station. The last scheduled southbound train from Meridian Water to London Liverpool Street leaves at 00.17 on Sunday morning. This is a Stansted Express service which is likely to be busy with background users. The last scheduled southbound train from Meridian Water to Stratford leaves at 22.56 on the Saturday evening. Abellio Greater Anglia will need to provide a large number of additional train services.
- Tottenham Hale LUL station is a 30 minute walk from the concert venue ignoring the time taken to egress the concert site itself. With a 22:30 finish, no attendees would reach Tottenham Hale before 23:00. The train frequency for the Saturday night event is 14 trains from 23:00 to midnight; 9 trains from midnight to 01:00; and then 6 trains per hour throughout the night, i.e.

night train services. The combined AGA and LUL train frequency towards Central London would need to increase from 35 services to some 60-65 services between 23:00 and 01:00.

- The ingress capacity at Tottenham Hale is restricted by the LUL construction site hoardings, the current temporary LUL station access and the station vertical circulation (an escalator and central stair). The platform access capacity is some 150 passengers per minute. On occasions this ingress capacity will be required for interchange from AGA trains towards the Victoria Line.
- The LUL train frequency will need considerable enhancement from 23:00 onwards. At 20 trains per hour only 450 passengers could board each train.

The Club therefore shares officers' concerns (Committee report paras. 9.21) that:

*"...the strain on existing infrastructure, in particular on Tottenham Hale Underground Station, which is expected to be used by 60% of patrons to leave the area."*


The Committee report concludes in respect of transport at 9.25 that:

*"Overall, whilst there are details to be finalised and there remains some concern about the impact of the event on the local transport network, particularly at Tottenham Hale Station, this is balanced against the fact that this permission will relate to a single event, which is taking place over a relatively short time period and the extensive planning that has been undertaken to ensure that negative impacts are mitigated as far as possible."*

**In the absence of key timetabling/service information to confirm that sufficient public transport capacity exists and crucially, in the absence of express support from Transport for London; the British Transport Police; and the Metropolitan Police, the Club cannot share this conclusion and must therefore object to the application.**

The Club would ordinarily wish to make representations in good time, but notes that despite being the operator of a 62,000 capacity stadium a mile away from the application site, was not originally notified of the application and did not become aware of it until the end of March. We trust therefore that Planning Committee will still give due consideration to these representations.

Yours faithfully



Richard Serra MRICS MRTPI  
**Head of Planning**

Mr Vincent Lacovara – Head of Planning, Enfield Council  
Mr Peter George – Programme Director (Meridian Water), Enfield Council

