

**THE LONDON BOROUGH OF HARINGEY
(HIGH ROAD WEST PHASE A)
COMPULSORY PURCHASE ORDER 2023**

DOCUMENT CD 9.7

**WITNESS 4: LUCAS LAWRENCE, STUDIO EGRET
WEST**

OVERVIEW PROOF OF EVIDENCE

1. QUALIFICATIONS, EXPERIENCE AND INVOLVEMENT IN THE SCHEME

- 1.1 My name is Lucas Lawrence. I am qualified as an Architect with the following qualifications BA Hons Dip. Arch RIBA ARB. I am one of three Senior Directors of Studio Egret West ('SEW'), which is an architecture, urban design and landscape architecture practice. I have over 24 years' experience in Architecture, Urban Visions, Placemaking and Strategic Framework plans. I am passionate about delivering high quality design and SEW delivers this through the fusion of place specific memorable architecture, strategic urban design and ecology driven landscape.
- 1.2 SEW's relevant expertise lies in leading strategic frameworks that provide a catalyst for positive urban regeneration, balancing the needs of creativity and placemaking with commerciality. Examples of the practice's most influential regeneration projects across the UK include:
- 1.2.1 The Old Vinyl Factory in Hayes - a mixed-use regeneration project containing 650 homes, 20,000 sqm of office space, an 8 screen cinema, affordable workspace, cafés and restaurants. The scheme was granted planning consent in 2013 and is currently under construction.
- 1.2.2 Vicarage Field in Barking - an exemplar in multi-layered ecological urbanism; a new retail, restaurant and leisure destination for East London. The scheme includes a 6-8 screen cinema and 300-capacity music venue, together with up to 855 high quality homes, a 150-room hotel, enterprise workspace for start-up businesses, a healthcare facility, a three-form entry primary school and extensive public realm and green space. The scheme was granted outline planning consent in 2017.
- 1.2.3 The Landing in Maidenhead - an employment-led mixed-use regeneration of a key town centre site within Maidenhead providing 5,000 sqm of retail space, 36,000 sqm of office space, 225 residential homes, 150 car parking spaces and a new public square. The scheme was granted planning consent in 2018.
- 1.2.4 Mayfield in Manchester - 1.5 million sq ft office and 1,500 home redevelopment around a new park adjacent to Manchester Piccadilly. The scheme was granted planning consent in 2020 and is currently under construction.
- 1.2.5 Digbeth in Birmingham - reimagining a 42 acre brownfield site to bring forward 2.2 million sq ft of commercial space and 1850 homes. The scheme was granted planning consent in 2021.
- 1.2.6 New Bermondsey in London - transforming an underused industrial area into a neighbourhood with 3,500 new homes, a new Overground station and sports facilities for the community, plus the creation of up to 1,250 new jobs. The scheme was granted planning consent in 2022.
- 1.2.7 Earl's Court - opening up the former exhibition centre site for the first time in 150 years to bring forward a strategic framework that will prioritise sustainability and the creation of a 'better piece of city' to set a benchmark for future generations. Working in collaboration

with Hawkins Brown, SEW are developing proposals that will form the basis of a hybrid planning application. The ambition is to create an environment that is reintegrated with its surroundings for the first time in 100 years, and in doing so, embraces the hopes and aspirations of the local community and the area.

- 1.2.8 Testament to our extensive experience in developing and delivering transformative regeneration schemes, SEW have received a range of industry awards, including:
- Park Hill – **Winner** of the British Homes Awards award for **Regeneration Scheme of the Year** (2022)
 - The Old Vinyl Factory – **Shortlisted** for the Pineapple Awards award for **Place in Progress – Creative Reuse** (2021)
 - Mayfield Masterplan - **Winner** of the MIPIM AR Future Projects award for **Regeneration and Masterplanning** (2020)
 - Mayfield Masterplan - **Winner** of the Planning Awards award for **Best Use of Brownfield Land in Placemaking** (2020)
 - The Old Vinyl Factory – **Shortlisted** for the New London Awards award for **Masterplans and Area Strategies** (2019)
 - Mayfield Masterplan - **Winner** of the RTPI Regional Awards award for Planning Excellence for **Best Planning Policy Document** (2018)
- 1.3 SEW was instructed by Lendlease (High Road West) Limited ("**Lendlease**") in April 2018 to lead on the production of the following key deliverables in relation to the comprehensive residential-led mixed use regeneration of the High Road West area (the "**Regeneration Scheme**"):
- 1.3.1 **Masterplan Preparation (MP01)** - leading the review of the masterplan developed by Lendlease as part of its successful bid to be the London Borough of Haringey's ("**the Council**") development partner in relation to the delivery of the Regeneration Scheme.
- 1.3.2 **Masterplan Detail (MP02)** – leading the development of the updated masterplan which would form the basis of the planning application for the Regeneration Scheme (the "**Planning Application**").
- 1.3.3 **Planning Application (MP03/04)** – collaborating with Lendlease and the wider consultant team to prepare the Planning Application.
- 1.4 I have been involved with the High Road West project since 2019. My role began as Project Director on the initial project stages for Lendlease, providing services within RIBA stages 0 and 1, which included strategic design support to develop the business case, optioneering to define and deliver the client requirements and feasibility studies for the Regeneration Scheme. I then acted as the Project Director for the Planning Application, with SEW providing services as the lead designer and the designer of masterplanning architecture and landscape architecture.

2. SCOPE OF EVIDENCE

- 2.1 I give evidence in respect of the design justification for the Scheme which underlies The London Borough of Haringey (High Road West Phase A) Compulsory Purchase Order 2023 ("**the Order**").
- 2.2 The Regeneration Scheme presents a comprehensive masterplan for the whole of the High Road West area, fulfilling the Council's planning policy aspiration for the delivery of comprehensive redevelopment, specifically for the Site Allocation NT5 as contained within the Tottenham Area Action Plan ("**TAAP**") in 2017¹ [**CD 3.5**].
- 2.3 While the planning permission reference HGY/2021/3175 (the "**Planning Permission**") covers the whole of the Regeneration Scheme, my evidence will primarily refer to the design and placemaking approach to Phase A ("**the Scheme**"), the first phase of the Regeneration Scheme, and the subject of the Order.
- 2.4 My evidence sets out the design approach behind the development of the illustrative layout submitted in support of the planning application for the Planning Permission, which provides a potential way in which that part of the development consented in outline could be delivered within the scope of the submitted control documents (the parameters plans, development specification and design code [**CD 4.03 to 4.05**] ("**the Illustrative Masterplan**").
- 2.5 My evidence reviews the existing site condition and details the design rationale, form and function of the site-wide layout and placemaking principles, so as to explain the requirement for the compulsory acquisition of those properties identified within the Order. Particular focus is placed on the existing properties located on the High Road directly opposite the Tottenham Hotspur Football Club's ("**THFC**") Stadium. In my evidence I establish the fundamental contribution made by these properties to the comprehensive masterplan proposals and address objections made against the Order in relation to their acquisition.
- 2.6 In preparing my evidence I have reviewed the objections made against the Order and respond to the following matters raised that relate specifically to my area of expertise:
- 2.6.1 the justification for including the five low rise residential blocks located to the south of Whitehall Street within the Order Land;
- 2.6.2 the justification for including the High Road properties within the Order Land; and
- 2.6.3 whether the benefits of the Scheme could be delivered without the inclusion of the either the High Road properties or the five residential blocks to the south of Whitehall Street.
- 2.7 In summary, my evidence will address the following:
- 2.7.1 Existing Site Assessment;
- 2.7.2 The Project Design Brief;

¹ 'Tottenham Area Action Plan', July 2017

- 2.7.3 Evolution of the High Road West Illustrative Masterplan;
 - 2.7.4 The Design Approach and Benefits of Phase A / The Scheme;
 - 2.7.5 The Scheme and Application of the Outline Planning Application Control Documents;
 - 2.7.6 Responding to the Design Related Objections; and
 - 2.7.7 Summary and Conclusions.
- 2.8 A booklet summarising the key points set out within my proof is attached at appendix [CD 9.8.1].

Terminology

- 2.9 In my proof of evidence references to the core documents are by the abbreviation, for example [CD.1]. Specific abbreviations are noted in the text on first use, and these abbreviations are also set out in the Glossary [CD 5.10]. Other proofs are referred to by the name of the author and core document reference.

3. SITE CONTEXT

- 3.1 The land required to deliver Phase A and the subject of the Order (the "**Order Land**") is well located at the heart of the North Tottenham High Road Local Centre with good transport connections to Central London and surrounding District Centres via train and bus. White Hart Lane Overground Station is at the western boundary to the Order Land. The station is served by the Lea Valley line which terminates at Liverpool Street and also provides connections at Seven Sisters and Hackney Downs/Hackney Central. The High Road (A1010) runs along the eastern boundary to the Order Land and is a key north-south arterial route into Central London.

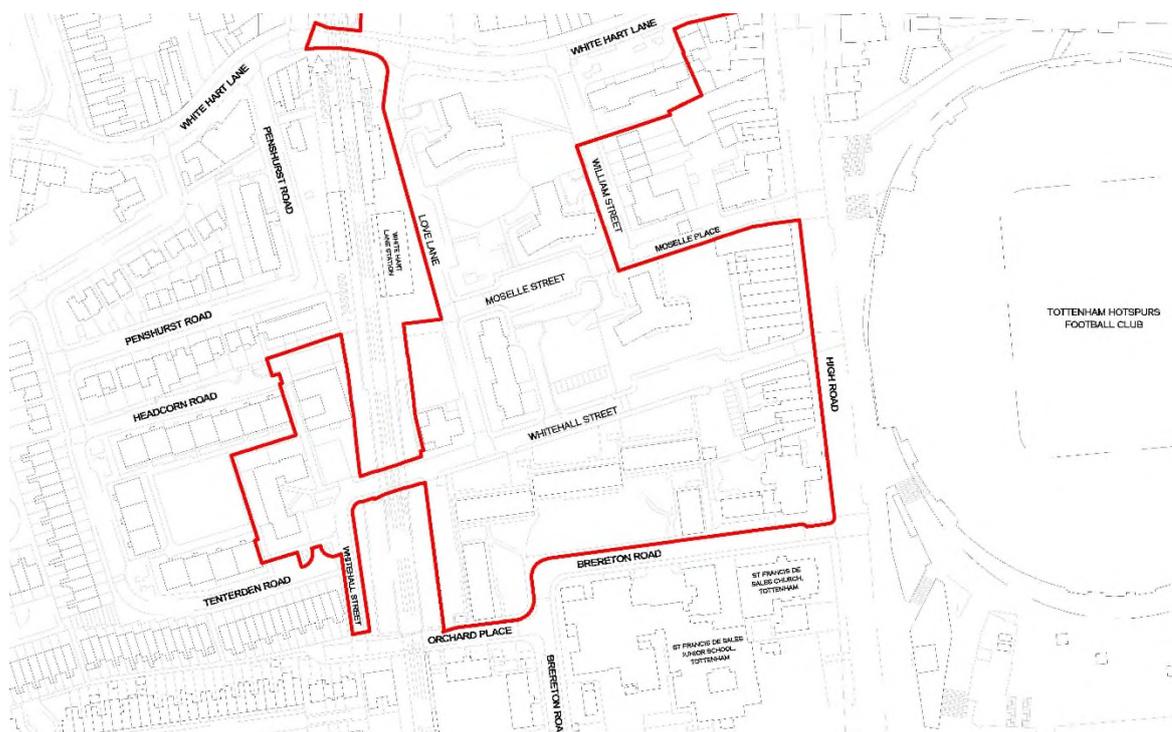


Order Land Context Plan

- 3.2 The Order Land is bounded by well-defined movement routes providing opportunities to integrate new restricted access and low traffic routes to the surrounding network, thereby prioritising pedestrian movement within the Order Land.
- 3.3 Immediately to the east of the Order Land lies the THFC stadium, with Northumberland Park railway station beyond that. To the west is predominantly residential uses, with Tottenham Cemetery lying further afield. To the south is the St Francis de Sales Church and Junior School, Tottenham Community Sports Centre and a series of residential properties along Church Road.
- 3.4 The Order Land has an important role in mediating between the existing busy High Road to the east, and the quieter residential neighbourhoods to the west. This provides an opportunity to focus appropriate land uses, in particular the delivery of community, retail and small enterprises along a reimagined and rejuvenated High Road.
- 3.5 The Order Land location and heritage context are described in detail within chapter 3 of the Design and Access Statement ("**DAS**") [CD 4.6] submitted in support of the Planning Permission.

4. EXISTING SITE ASSESSMENT

- 4.1 The Order Land comprises circa 4.2 hectares of mixed-use brownfield land within the High Road West area. It comprises the existing Love Lane Estate, properties along the High Road and internal residential streets. The Order Land is bounded to the north by White Hart Lane, to the east by High Road, to the south by Brereton Road, and to the west by White Hart Lane Overground Station, with 100 Whitehall Street and the site of the former Whitehall & Tenterden Community Centre sitting to the west of the overground railway line. The remainder of the NT5 Site Allocation lies to the north of the Order Land, which comprises the Peacock Industrial Estate, the Goods Yard and Carberry Enterprise Park and a large retail store currently occupied by a B&M store.



Phase A Site Boundary

- 4.2 Early in the project design process, an assessment of the existing site condition was conducted and is summarised below.
- 4.3 **The Love Lane Estate**
- 4.3.1 The Love Lane Estate comprises 297 properties set across three 10 storey towers and seven 4 storey deck-access blocks, with the following unit split:
- Ermine House - 60 units
 - Charles House - 60 units
 - Moselle House - 60 units
 - 9-39 White Hart Lane - 16 units
 - Kathleen Ferrier Court - 19 units
 - 2-32 Whitehall Street (evens) - 16 units

- 3-29 Whitehall Street (odds) - 14 units
- 31-61 Whitehall Street (odds) - 16 units
- 63-89 Whitehall Street (odds) - 14 units
- 2-28 Orchard Place - 14 units
- 4-18 Brereton Road - 8 units

4.3.2 Built in the 1960s, the Love Lane Estate replaced traditional Victorian streets to create a sequence of standalone residential buildings within open green lawns, supported by community buildings. The existing built form presents an irregular, non-uniform layout which sits in stark contrast to the prominent grain of the surrounding area.



Moselle House and Charles House surrounded by gated and inactive lawns

4.3.3 The buildings on the Love Lane Estate no longer meet current residential standards, poorly activate the streetscape and present tired, dated and defensive residential blocks. Blank and inactive gable facades to each block create poorly overlooked areas of public realm. Extensive elevated walkways that connect the low rise blocks create convoluted and inefficient routes without suitable defensible space to the residential properties that line them.



Looking north from Brereton Road showing blank gable ends and convoluted walkways

- 4.3.4 Similarly, the various areas of open lawn on the Love Lane Estate present leftover and undefined spaces that are poorly activated, creating a tired and under used appearance. High fences and hedges surround many of these spaces, creating an unwelcome and guarded threshold to the streets within the Love Lane Estate. As such, despite some of the existing residential blocks providing segregated green space as well as the Love Lane Estate containing a (poorly equipped) play area, relatively little of the space is used effectively. The set back and detached location of the buildings from the street; narrow footpaths; lack of street furniture, play space and active landscapes; and limited street lighting and overlooking, creates an uncomfortable and sterile streetscape experience. This discomfort encourages pedestrians to move through the area without dwelling or engaging in incidental activities, resulting in a noticeable lack of life and pedestrian presence throughout the neighbourhood.
- 4.3.5 Resident parking courts, garages and on-street parking bays present hard and car dominated streetscapes that discourage pedestrians from inhabiting and moving freely through the public realm.



Whitehall Street, presenting a defensive, lifeless and car dominated streetscape

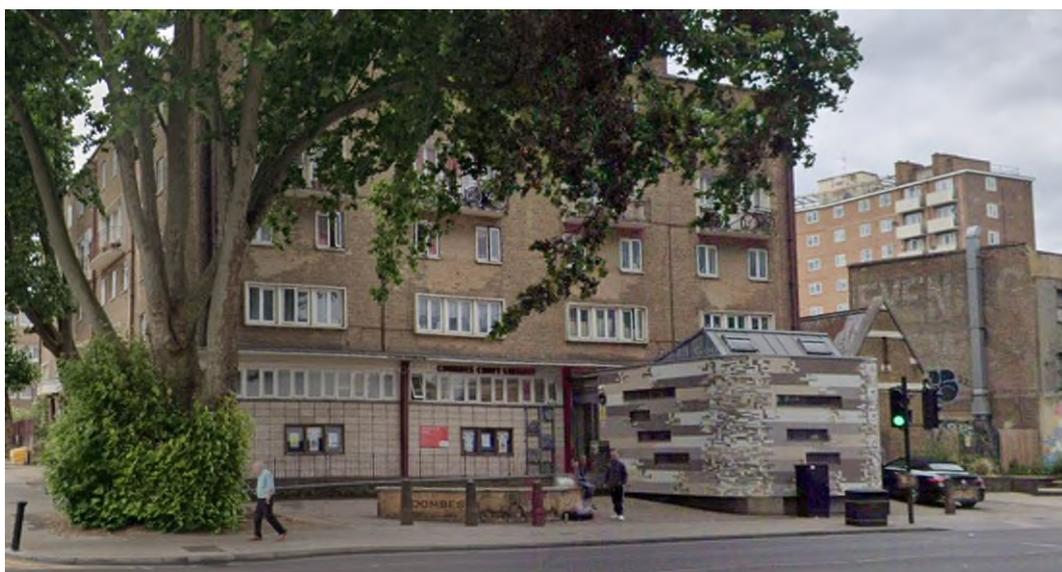
4.4 Buildings along the High Road

- 4.4.1 The buildings along the High Road that fall within the Order Land comprise two Victorian terraces with ground floor retail and commercial spaces fronting the street, and residential properties above. Whilst the two terraces provide some linear continuity, they are much altered and their contribution to the neighbouring conservation area is limited. The existing buildings do little to add to the character and feel of the High Road Local Centre, having lost much of their historic integrity with the introduction of ad hoc shop fronts. The buildings' projecting frontages create a narrow and cluttered pavement, amplifying the street's hustled and uncomfortable character.



High Road, presenting a cluttered pavement environment

- 4.4.2 The rear of both terraces presents an ad hoc arrangement of poor-quality ground floor extensions backing onto rear access alleyways. These spaces are poorly maintained, poorly overlooked and poorly lit. This creates a dark and intimidating environment.
- 4.4.3 At the southern corner of the Order Land, the Coombes Croft Library is located at the ground floor of the Kathleen Ferrier Court building fronting onto the High Road. The building's set back and inactive frontage and largely concealed entrance do little to promote this valuable community asset. Instead, this unassuming and largely blank façade hides the facility from the streetscape, resulting in a lack of engagement with its surrounding community.



Coombes Croft Library, presenting a concealed entrance and poor relationship to street

- 4.4.4 Due to its limited contribution, the section of the High Road contained within the Order Land, between Moselle Street to Brereton Road, has been removed from the North Tottenham High Road Conservation Area. However, the existing terraces contain a number of locally listed buildings, and a further selection of listed and locally listed buildings are within the immediate context. Whilst these features provide constraints to the scale and setting of the Scheme (with regard to its impact on the heritage assets), they also present an opportunity to draw on the character and architecture of these assets within the design approach.
- 4.4.5 A detailed description of the conservation area and listed buildings within the vicinity of the Order Land is summarised in chapter 3 of the DAS [CD 4.06].
- 4.5 **White Hart Lane**
- 4.5.1 The section of White Hart Lane contained within the Order Land has benefitted from recent improvements to the public realm. Flush kerbs provide ease of access and connectivity for pedestrians, while new paving and concrete bands in the road offer a subtle form of legibility and detailing to suggest the road is pedestrian friendly.

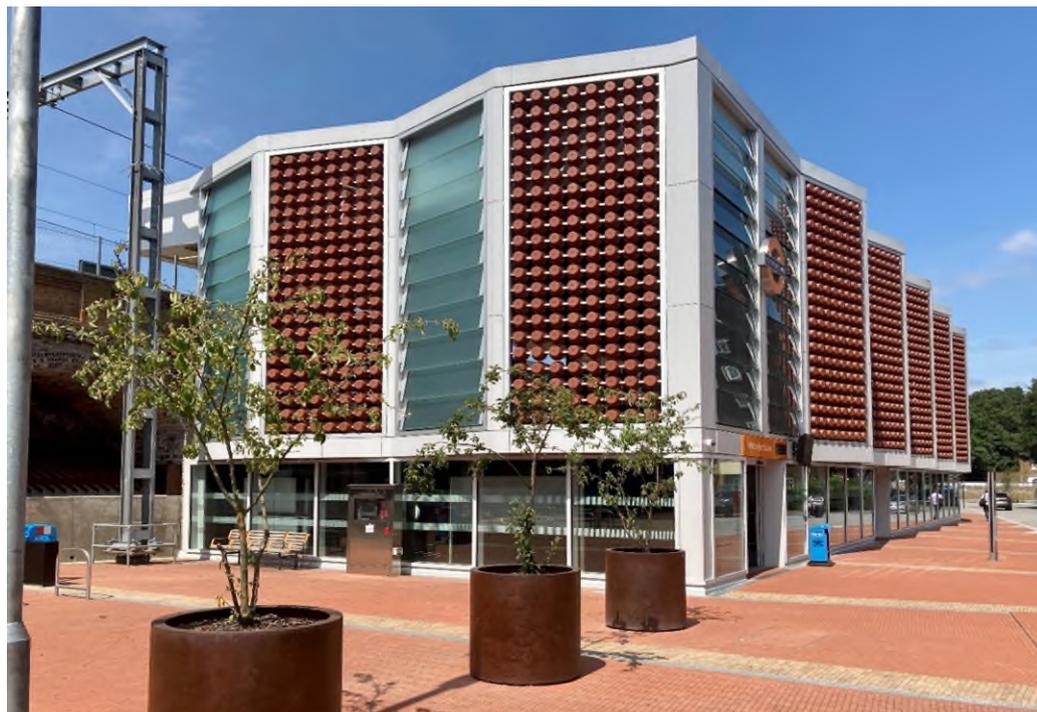
- 4.5.2 Sunken rain gardens located adjacent to the road are protected by natural stone kerb upstands. Large natural stone slabs located on the corners of the rain gardens provide informal seating. Small trees planted within the rain gardens provide eye level animation.
- 4.5.3 In contrast to the adjoining streets running through the Love Lane Estate (and despite the buildings being set back from the street edge and offering little activation of the public realm) the generous streetscape is active and well used, colourful and ecologically rich, encouraging people to sit, dwell and interact within a comfortable environment.



White Hart Lane encouraging people to inhabit the public realm

4.6 **White Hart Lane Station Arrival**

- 4.6.1 Similarly, recent improvements to the White Hart Lane Station arrival space have softened the streetscape via the introduction of planting, colourful paving and low kerb edges. The result is a good quality environment that feels pedestrian friendly, welcoming, cared for and safe.



White Hart Lane Station public realm improvements

4.7 **Brereton Road**

4.7.1 Brereton Road presents an inactive, austere and sterile streetscape. Set back buildings, blank gable ends and high fences isolate the street, adding to the area's lack of safety and feelings of vulnerability. A large area of open lawn is located in front of the residential blocks. Despite offering some public amenity to residents, the close proximity to surrounding residences, and lack of definition, seating, planting and definitive function, means the space is underused.

4.8 **100 Whitehall Street and site of former Whitehall & Tenterden Community Centre**

4.8.1 Located to the east of the railway tracks, 100 Whitehall Street presents a self-contained residential block that is set back from the street edge, holding a detached relationship to the streetscape. The block is surrounded by defensive railings, further isolating the building from its surroundings.

4.8.2 Similarly, prior to its demolition in 2022, the isolated Whitehall & Tenterden Community Centre presented a tired and outdated building with completely blank facades onto the surrounding public realm.



100 Whitehall Street and the former Whitehall & Tenterden Community Centre

- 4.9 The comprehensive redevelopment of the buildings and surrounding public realm presents an exceptional opportunity to resolve the Order Land's physical, environmental and social challenges, reintegrate the area into the wider local centre and transform a tired piece of city into an exemplar urban neighbourhood.

Summary of Key Points:

- The Order Land comprises the existing Love Lane Estate, properties along the High Road and internal residential streets.
- The Love Lane Estate comprises three 10 storey towers and seven 4 storey deck-access blocks. Buildings are arranged into a sequence of standalone blocks that poorly address the surrounding streets, creating tired, defensive and poorly defined streetscapes and areas of public realm.
- The buildings along the High Road that fall within the Order Land comprise two Victorian terraces. The existing buildings do little to add to the character and feel of the High Road Local Centre, having lost much of their historic integrity.
- The Coombes Croft Library presents an inactive frontage with a largely concealed entrance, resulting in this valuable community asset being somewhat hidden from the street.
- In contrast to the surrounding streets, White Hart Lane and the Station arrival space have benefitted from recent Improvements to the public realm, crating pedestrian friendly streetscapes.
- 100 Whitehall Street and former Whitehall and Tenterden Community Centre present tired and defensive blocks with blank facades onto surrounding routes.

5. THE PROJECT DESIGN BRIEF

- 5.1 As set out in further detail in the evidence of Tom Horne [CD 9.5], the wider High Road West area, of which the Order Land forms part, has been specifically allocated for comprehensive redevelopment since the adoption of the TAAP in 2017.
- 5.2 The TAAP identifies the area's distinct need for change, with the NT5 Site Allocation setting out the strategic ambition for the Regeneration Scheme. Site Allocation NT5 is supported by the Tottenham High Road West Masterplan Framework (HRWMF) [CD 3.6] which was adopted in September 2014 following a long period of consultation with the public and other key stakeholders. These form part of the Council's adopted planning framework for the delivery of Site Allocation NT5, calling for creation of a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London.
- 5.3 In order to fulfil the Order Land's regeneration potential, a critical mass of accommodation is needed to deliver greater social, environmental and economic benefits, as well as high-quality public realm and open space amenity, underpinned by a diverse mix of new housing.
- 5.4 The original brief set by Lendlease in December 2017 was formulated to reflect this underlying planning policy regarding the delivery of the Regeneration Scheme. This established the desire to deliver: c.2,500 homes; c.15,000 sqm of non-domestic space; and c.13,000 sqm of publicly accessible open space.
- 5.5 The original brief establishing a range of parameters and development objectives which have been subject to evolution as the requirements and understanding of the Scheme have grown over time.
- 5.6 The evolution of the brief has been captured through key design milestones and deliverables, and has been shaped through the pre-application process and discussions with the Council and other key stakeholders.
- 5.7 Although the brief was in respect of the entire Regeneration Scheme, for the purposes of this section, I have dealt with the brief insofar as it relates to the Scheme.
- 5.8 While the brief has evolved through the design development process, the vision for the Scheme has remained consistent; to deliver a neighbourhood of exemplary quality, supporting the Council's bold ambition for growing prosperity and employment, and expanding the Tottenham High Road Local Centre through stimulating housing delivery and commercial vitality, via transformative placemaking and amplifying the area's identity as a destination for community and leisure.
- 5.9 Importantly the brief sought to significantly improve the Order Land's dire public realm and lack of open space, which is currently of poor quality and negatively impacts on the experience of the surrounding area, and the local centre as a whole. Thus, the design brief required that the Scheme deliver extensive public realm and open space that is well-integrated into the surrounding streets and neighbourhoods (see page 89 of the TAAP).
- 5.10 Emphasis was placed on fulfilling the key requirements of the TAAP and the HRWMF to create a new public square along the important new pedestrian link to be delivered between the improved

White Hart Lane Station and new THFC Stadium, as well as the creation of high-quality public realm at the Order Land's interface with the High Road, complimenting the redevelopment of the Stadium and its significant contribution to the renewed character of the area.

- 5.11 Integral to the brief was the desire to transform the existing High Road, enhancing and extending the local centre with the provision of community, cultural and leisure activities, to create a high-quality, destination community heart. This aspiration was to be supported by the delivery of fit for purpose, commercial and local centre floorspace that would be flexible and adaptable to the current and future demands for the North Tottenham Local Centre (see page 110 of the HRWMF).
- 5.12 Building on this established vision, the Council and Lendlease, along with the design team, developed proposals to deliver a game-changing, mixed-use environment for the Scheme that exceeds the quantum and mix of land uses contained within the original brief. This led to the consented masterplan delivering the opportunity for the Scheme to deliver: a new Library and Learning Centre; a vibrant retail and restaurant offer; enterprise and light industrial workspace; leisure, cultural and community spaces; together with up to approximately 1,665 high quality homes, and nursery and healthcare facilities.
- 5.13 The combination and extent of these land uses within the Scheme aims to meet the desire to create a location that will operate both during the day and in the evening, as well as on the numerous THFC Stadium event days and non-event days, another important requirement for the local centre (see page 104 of the HRWMF).
- 5.14 From the outset, the acquisition and removal of the High Road properties opposite the THFC Stadium was identified as necessary to deliver this ambition, given their location in the context of the Station and the THFC Stadium. The requirement for the removal of the High Road properties is considered in detail within section 9 of this proof.

Summary of Key Points:

- The TAAP and HRWMF form the planning framework for the delivery of the Scheme, establishing the need for comprehensive regeneration.
- The original brief, as set by Lendlease in 2017, built on the planning framework to establish the parameters and development objectives for the Regeneration Scheme.
- Design evolutions throughout the design development process have led to the consented masterplan delivering the opportunity for the Scheme to deliver a game-changing, mixed-use environment.
- From the outset of the project, the acquisition and removal of the High Road properties was identified as necessary to deliver the overarching ambition.

6. EVOLUTION OF THE HIGH ROAD WEST ILLUSTRATIVE MASTERPLAN

- 6.1 The following summarises the evolution of the masterplan for the Scheme.
- 6.2 The HRWMF set out the vision for High Road West, establishing the site parameters and key principles for change based on existing policy and best practice, in order to guide the development proposals for both the Regeneration Scheme and the Scheme. The HRWMF established the Order Land's spatial framework, defining a legible urban grain, key routes, open spaces, design principles and the distribution of uses across the Scheme. A copy of the HRWMF as it relates to the Order Land is set out below.
- 6.3 Importantly, the HRWMF incorporates the removal of the existing High Road properties directly opposite the THFC Stadium, in the interest of delivering a new community centre, alongside a broader mix of homes, shops and commercial services to better serve the local community and attract new residents and visitors.



2014 Masterplan Arrangement, HRWMF, 2014

- 6.4 Building on this initial vision, in 2016 the Council sought to appoint a development partner for the Regeneration Scheme via a procurement competition. The Competition Masterplan, submitted as part of the Lendlease bid, established the design team's vision, broad spatial moves, and key principles that deliberately reinforce those of the HRWMF.



2017 Competition Masterplan Arrangement

- 6.5 Building on the success of the Competition Masterplan, Lendlease and the design team, led by SEW, embarked on a process of design development throughout 2018. Together, they engaged with the community, Council, THFC, Environment Agency, Thames Water, Network Rail, and the Haringey Quality Review Panel ("**QRP**"), to further develop the proposed masterplan and the core principles identified in section 5 above.
- 6.6 This revised masterplan retained the Competition Scheme's endorsed design principles and key spatial moves, which reflect the key principles contained within the adopted planning framework.
- 6.7 Feedback from the QRP report of 27th June 2018 [**CD 4.16**] questioned whether the 'backland' location of "Moselle Square" behind the new High Road frontage was the best approach. The QRP suggested that a more generous plaza that opened onto the High Road may provide a better setting for the THFC Stadium, as well as being positioned to give better 24-hour surveillance from the High Road.



2018 Masterplan Arrangement

6.8 In 2019, responding to the feedback from the project's initial pre-application meetings, the requirements of the TAAP and QRP discussions, the design team continued to develop the masterplan. Key design evolutions from the 2018 masterplan included:

- A more generous arrival space at White Hart Lane Station offering a better sense of arrival and route towards Moselle Square; and
- Reducing the footprint of Plot E, and relocating massing to Plot F, allowing an unobstructed view of the Stadium skyline from White Hart Lane Station, and a more generous interface with, and connection to, the High Road from Moselle Square. A more generous setback from the High Road similarly allows greater relief and the ability to deliver an improved public realm along the High Road.



2019 Masterplan Arrangement

6.9 In 2020, in response to further feedback from the QRP in its report dated 30th January 2019 [CD 4.17], Lendlease and the design team undertook a series of Design and Planning Working Group Meetings to review the masterplan. Key design evolutions from the 2019 masterplan included:

- Further reduction of the footprint of Plot E to create a more comprehensible pavilion community building that prioritises integration with the open space thereby offering a sense of transparency, and encouraging visual connection between the High Road and Moselle Square; and
- Enlarging Moselle Square to maximise opportunities for Moselle Square to accommodate a varied programme of events and community activities.



2020 Masterplan Arrangement

6.10 During this process, Lendlease, LBH and the design team consulted with THFC on a revised framework approach to the Order Land.

6.11 Further design refinements took place during 2021, leading to the Masterplan submitted in support of the Planning Application (the "**Illustrative Masterplan**").

6.12 The Illustrative Masterplan reflects, and is a product of, the underlying planning policy framework and the extensive programme of stakeholder engagement, delivering on the core placemaking principles discussed in section 5 above.



2021 Illustrative Masterplan Arrangement

Summary of Key Points:

- The HRWMF established the site parameters and key principles to guide the Scheme's development proposals, incorporating the removal of the existing High Road Properties.
- The 2016 Competition Masterplan established the design team's vision, broad spatial moves and key principles, reinforcing the HRWMF.
- Following a process of extensive engagement during 2018, a revised masterplan provided a better setting for the THFC Stadium.
- Key stakeholders engaged with during the design evolution included THFC, local residents and businesses, the Council, the Environment Agency, and Network Rail.
- Responding to comments from QRP during 2019 and 2020, further revisions prioritised greater integration between the High Road and an enlarged Moselle Square. THFC were again consulted on the evolving proposals.
- Further design refinements during 2021 led to the Illustrative Masterplan submitted in support of the Planning Application, which continues to reflect the principles of the planning framework.

7. THE DESIGN APPROACH

7.1 The following section describes the Illustrative Masterplan as it relates to the Scheme, and sets out its key design principles and the key design related benefits associated with the Scheme.

7.2 Much of the detail regarding the design principle underlying the Scheme is captured in chapter 5 of the DAS submitted in support of the Planning Application [CD 4.6], and so the following section provides a guide to the content of the DAS.

7.3 The Illustrative Masterplan Design Summary

7.3.1 From the outset the design team sought to capitalise on the Order Land's inherent development potential to establish an exemplar in estate regeneration and local centre rejuvenation. The design approach maximises site opportunities to create an economically viable, deliverable and sustainable new development. The Scheme provides for an environment throughout that is safe, welcoming and attractive for residents, visitors, workers, and service providers. It builds upon the heritage assets of the High Road, creating an enhanced sense of place, a destination users can be proud to be in, and represents a catalyst for change in realising North Tottenham's prosperous future.

7.3.2 The design of the Scheme has a strong identity rooted in the history of the Order Land. This is reflected in the approach to the plot layout and architectural design. Building on the Order Land's heritage urban grain, a legible and highly permeable arrangement of perimeter plots are animated by a series of taller buildings running along the western boundary, offering wayfinding landmarks to wider movement and delivering a density of much-needed high-quality homes. A vibrant mix of retail, community, leisure and enterprise work spaces surround the Scheme's active and people orientated new public open space.

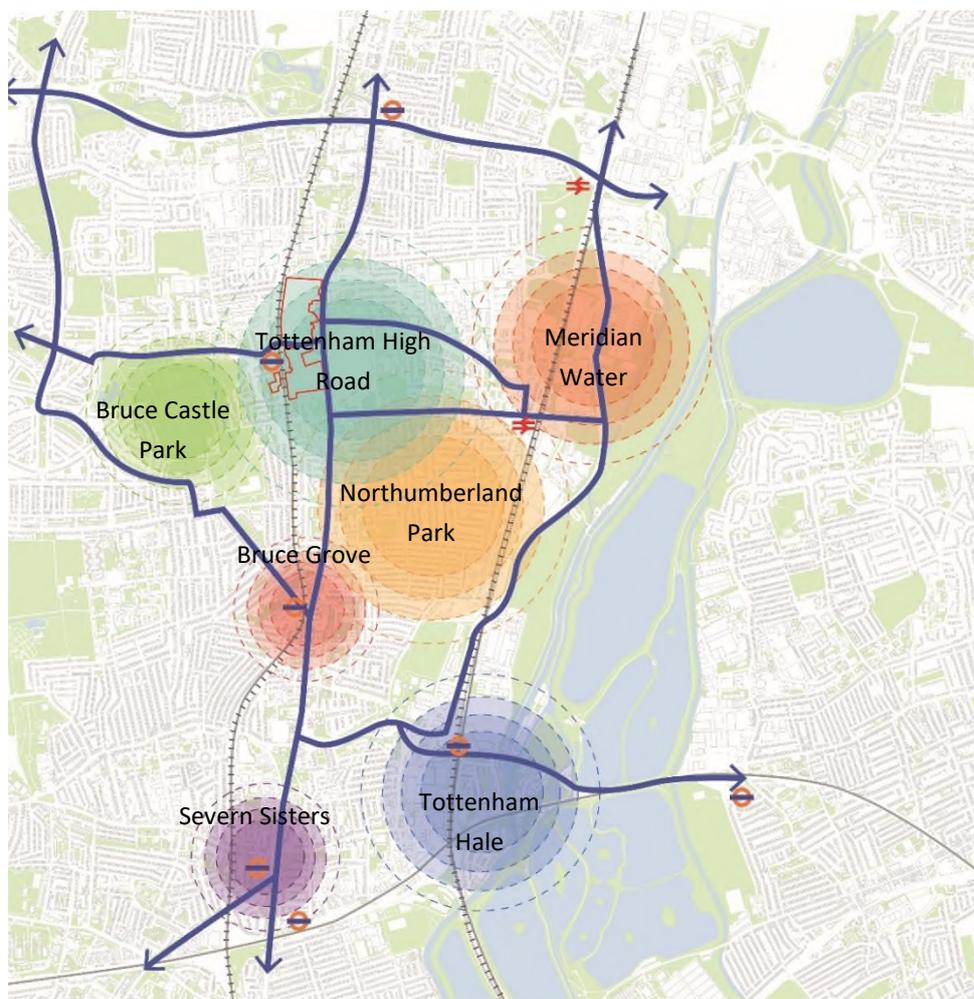
7.3.3 A generous axial route dissects the Order Land, connecting the key destinations of White Hart Lane Station and THFC Stadium, directing a positive flow of pedestrian movement between them. At the southern and eastern edges, low-rise buildings adopt the scale and rhythm of the existing heritage townscape, responding to the neighbouring Conservation Area and listed buildings. At the convergence of the Scheme's routes lies Moselle Square, a multi-purpose open space representing the heart of the community and extended local centre; open, inclusive and welcoming, acting as a focal point, a cultural, community and leisure destination with significant amenity and play space for local residents, and flexible space for a multitude of activities and happenings.

7.4 Overarching Placemaking Principles

7.4.1 Amalgamating the Scheme's design evolution, extensive stakeholder contributions and visionary potential, a set of overarching placemaking principles were created to fulfil the Scheme's strategic ambitions and deliver the requirements of the design brief and the

adopted planning framework. These core principles were shaped and defined through the public consultation, and pre-application engagement meetings with the Council and workshops with the QRP, as referred to above.

- 7.4.2 **Transformative Tottenham** - Tottenham is a key growth area within Haringey that is experiencing significant change via the delivery of a number of dynamic neighbourhood transformations, significant infrastructure improvements, and high-quality living, working, studying and visiting opportunities. The Scheme is designed to encapsulate this energy, with strong consideration to the area's youthful and ethnically diverse population, creating a place that fosters inclusivity, promotes diversity, and is welcoming to all. The THFC Stadium regeneration, White Hart Lane Overground Station improvements, and Crossrail 2 stations at Northumberland Park, Tottenham Hale and Seven Sisters are driving significant contemporary change and increased accessibility to the area. The Scheme will complement these neighbouring destinations and strategic connections, reinforcing the area's existing importance and function, to transform the High Road into a thriving local centre.



Local Centres across Tottenham leading its transformative growth

- 7.4.3 **Reinvigorate the High Road** - The High Road's heritage significance is an important reference point; it establishes the urban fabric from which inspiration for the Scheme can be drawn. The Scheme captures this sense of local character and the heritage of the place by retaining and enhancing the setting of key heritage buildings, to continue a sense of layered history throughout the area. New infill and replacement development respects and responds to the Conservation Area and neighbouring heritage buildings, creating a transition between the new and the old.



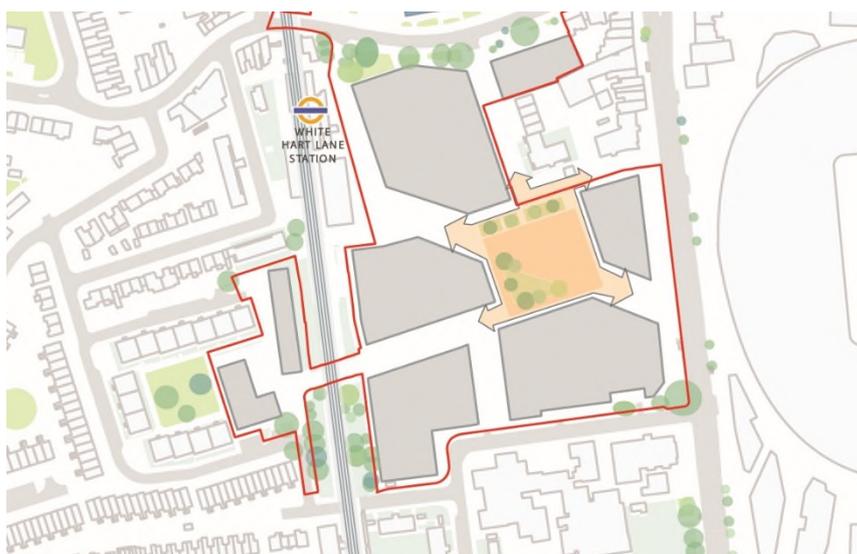
Reinvigorating the High Road

- 7.4.4 **Complimenting and enriching the existing urban grain** - Stitching into the network of streets surrounding the Order Land allows the Scheme to integrate with the existing townscape and established movement routes. A network of new streets creates a legible urban grain. Running behind the High Road, pedestrian orientated north-south links connect the new neighbourhood, while east-west routes offer important connections to surrounding communities, improving permeability, accessibility and connections between key community destinations. New streets promote a positive relationship between buildings and public realm, delivering a strong sense of place, accessibility, animation and legibility. All internal routes promote low car usage and speeds to prioritise pedestrian and cycle movement, and encourage ground floor activities to spill out into the public space.



Complementing and enriching the existing urban grain

- 7.4.5 **A generous open space defining the heart of the neighbourhood** - A new public open space is introduced at the heart of the Scheme, creating a lively destination and engaging space that promotes social interactions and healthy living. Moselle Square offers a generous space to celebrate community, leisure and nature, and accommodates a mixed programme of activities to support the community's diverse social and cultural needs. Its welcoming leisure and recreation offer is framed by new buildings, and animated by active uses at their lower levels.



A generous open space defining the heart of the neighbourhood

- 7.4.6 **Connected by green public realm** - The Scheme weaves a verdant public realm network with connected open spaces characterised by places to socialise, places to play,

and places to interact with nature. Streets and open spaces provide a mix of passive and active spaces for social interactions where people can ‘make them their own’, with a new approach to play – not just confined to ‘play areas’, creating playable landscapes within all public realm, whilst reconnecting people with nature to enhance health and well-being.



A connected green public realm network

7.4.7 A complementary retail, community and leisure offer - The THFC Stadium, and associated leisure uses, creates a place of regional, national and international significance. Alongside this iconic destination and the existing offer along the High Road, the Scheme will expand the existing Local Centre with high-quality public realm and a complementary mix of retail, community and leisure uses. A range of new uses will drive economic growth, helping existing and new businesses to thrive. The increased quantum of retail, leisure, community and cultural assets will draw a vibrant and mixed community to live, play, visit and work in the area, resulting in increased visitation and vitality.



A complementary retail, community and leisure offer

7.4.8 **An inclusive community for multi-generational living** - The Scheme is designed to accommodate a broad mix of home types, sizes and tenures to meet local demand, provide housing choice for residents, and meet the Council's targets for good quality and affordable homes, with a significant uplift to the current provision within the Love Lane Estate. A mixed community approach is applied across the Order Land to ensure the growth of diverse communities. New residential buildings benefit from a range of private, communal and public open spaces incorporating a range of residential typologies.



An inclusive community for multi-generational living

7.4.9 **Key places of rich and varied character** - In recognition of the varied character surrounding High Road West, the Scheme was developed as one neighbourhood with a diverse collection of characterful key places. Each key place is defined by their mix of uses, location, context and distinct character and identity. This differentiation of character welcomes a variety to the architecture and public realm design as the Scheme emerged through each design phase.



Key places of rich and varied character

Summary of Key Points:

- The design approach maximises the Order Land's opportunities and heritage context.
- The Scheme encapsulates the area's transformative growth.
- The High Road's heritage significance informs the Scheme's urban fabric.
- The Scheme stitches into the network of streets surrounding the Order Land, integrating with the existing townscape.
- Moselle Square celebrates community, leisure and nature, while accommodating a mixed programme of activities.
- The Scheme weaves a verdant public realm network with connected open spaces.
- The Scheme expands the existing Local Centre with high-quality public realm and a complementary mix of retail, community and leisure uses.
- The Scheme is designed to accommodate a broad mix of home types, sizes and tenures to meet local demand.
- The Scheme was developed as one neighbourhood with a diverse collection of characterful key places.

8. THE SCHEME

- 8.1 As noted above, the Order Land has been identified in the Development Plan as being suitable for a large-scale mixed-use regeneration project since 2017. The Scheme, with the support of the Order, provides an opportunity to realise those long held policy ambitions.
- 8.2 A detailed explanation of the Planning Permission is provided in the proof of Tom Horne [CD 9.5].
- 8.3 The Planning Permission grants consent for the whole of the Regeneration Scheme.
- 8.4 In respect of the Scheme, the Planning Permission authorises necessary demolitions and comprehensive redevelopment of the Order Land, to provide a mix of residential, commercial and leisure uses, along with a new public square.
- 8.5 The exact location and quantum of uses across the Scheme will be confirmed as reserved matters applications are determined. However, in respect of the Scheme, the Planning Permission provides for the following quantum of uses:
- 8.5.1 between 127,500 sqm and 156,500 sqm residential floorspace sqm GEA of residential floorspace, which equates to between approximately 1,350 and 1,665 new homes;
 - 8.5.2 40% affordable housing (by habitable room) which will (in combination with Plot A) include the provision of 500 social rented Council homes including replacement homes for existing residents on the Love Lane Estate;
 - 8.5.3 a new Library and Learning Centre which can include enterprise and business space, adult learning facilities, a children's library and flexible spaces for community and cultural activities, and which will be the subject of an architectural design competition. A minimum of 500 sqm and a maximum of 3,500 sqm GEA of Class F space is available for this use;
 - 8.5.4 a minimum of 2,150 sqm and a maximum of 8,000 sqm GEA of non-residential Class E(a-e) floorspace to deliver:
 - new retail, restaurant and commercial / professional / financial services provision of a range of sizes and types;
 - new leisure uses including indoor sports; and
 - a replacement Health Centre if required (the current plans are to relocate the existing Health Centre located on the High Road within the Scheme, but an alternative new location exists to the west of the High Road).
 - 8.5.5 Up to: -
 - 1,000 sqm GEA of Class E(f) floorspace for a new creche or nursery;
 - 2,150 sqm GEA of Class E(g) floorspace for office, research & development and manufacturing;

- 3,000 sqm GEA of sui generis floorspace for the provision of a public house; and
 - 3,000 sqm GEA of sui generis floorspace for the provision of a cinema;
- 8.5.6 a new public square of a minimum of 3,500 sqm (Moselle Square). The new Square will provide a range of benefits for the community, including leisure and social spaces and capacity for events, markets, and other activities, as well as providing a more spacious and appropriate access to and from the Station and the THFC Stadium;
- 8.5.7 a District Energy Network to serve the Scheme and which has the capacity to serve other buildings including potentially those within Phase B;
- 8.5.8 all new homes within the Scheme as 'visitable' dwellings in line with Part M Volume 1 M4(1) of the Building Regulations;
- 8.5.9 new communal residents' amenity space;
- 8.5.10 a pedestrian link between Whitehall Street and Headcorn Road; and
- 8.5.11 landscaping, amenity space and parking provision, including the provision of a green play street at Brereton Road and Orchard Place.

Application of the Control Documents

- 8.6 The key aspects of the Planning Permission that inform the Scheme's design and placemaking are captured within three of the approved documents; the Development Specification [CD 4.04], Parameter Plans [CD 4.03] and Design Code [CD 4.05]. These represent the Planning Permission's control documents, defining the appearance, quality and quantum of development.
- 8.7 The scope of each document is set out in full within the proof of Tom Horne [CD 9.5]
- 8.8 The Illustrative Masterplan submitted in support of the Planning Application illustrates Lendlease's vision for the Development. By virtue of the Council granting Planning Permission for the Development, it is also clear that the Illustrative Masterplan depicts a form of the Development acceptable to the Council

Plots within the Scheme

- 8.9 A series of plots were consented by the Planning Permission, establishing an integrated urban grain with connected public realm network and diverse mix of characterful buildings that respond to the area's heritage setting. Each plot is identified on the Illustrative Masterplan below.



8.10 Aside from Plot A, the plots sit within that part of the Planning Permission for which outline consent has been granted pursuant to the Planning Permission. The detailed design of each plot will form part of the respective reserved matters application which will need to comply with the control documents discussed above. A summary of each plot as shown within the Illustrative Masterplan is set out below. The location of the various views set out below are shown on the plan appended to this proof at **[CD 9.8.2]**.

8.10.1 **Plot A** - The Planning Permission grants detailed consent for Plot A. Plot A comprises two low-level blocks that form Whitehall Mews and deliver the first homes for the residents of the Love Lane Estate. The plot has been designed to form a connection between the existing local vernacular and the emerging Scheme. The two blocks respond to the urban grain, creating strong visual termination to the vista along Whitehall Street to draw people into the residential environment of the central mews garden.



- 8.10.2 *Illustrative representation of Plot A as permitted by the Planning Permission (View 01)* **Plot B** - creates a defining transition between the existing residential buildings to the south and the Scheme's higher density living. Ground floor duplex homes will activate the improved public realm, maximising street planting and pedestrian and cycle movement. The plots open southern aperture will maximise daylight and sunlight into the central communal garden and surrounding residential units.
- 8.10.3 **Plot C** - forms the southern boundary to Moselle Square. The plot will reinforce the civic nature of the space with a unified frontage of animated retail and leisure units with a spill out of activity supporting the community life of the space. The plot will comprise three prominent north-south oriented buildings connected by lower level connecting blocks. Ground floor duplex homes to the west and south, alongside commercial units to the north and east, will create a fully activated frontage onto the improved public realm. Occupied rooftops at lower levels and a communal resident's garden offer a variety of amenity spaces. To the east of the plot, an enclosed commercial yard offers a secluded commercial spill out space connected to both the High Road and Moselle Square.



Illustrative representation of Plots C and E fronting Moselle Square as described within the Planning Application (View 02)

- 8.10.4 **Plot D** - holds a pivotal position on the Scheme's two key vistas (east-west from the High Road, and north-south from White Hart Lane), the plot will deliver a prominent tall landmark building framing the station gateway and offering a wayfinding feature visible from across the masterplan and beyond. The building's stepped form and prominent silhouette on the skyline, will play an important role in accenting its prominence, design quality and contribution to the identity of the new neighbourhood. The plot's northern and eastern frontages offer ground floor activation with a mix of retail and leisure uses to animate the Scheme's key axial route and western edge of Moselle Square.



Illustrative representation of Plot C, D and F fronting Moselle Square as described within the Planning Application (View 03)

- 8.10.5 **Plot E** - plays a crucial role in the Scheme, housing a unique mix of community, leisure and commercial uses including the Library and Learning Centre. Located at the interface between the High Road, THFC Stadium and Moselle Square, the building represents a transition between the Scheme and its prominent context. The building will deliver two distinct elevation designs; to the west extending the verdant landscape of Moselle Square across stepping terraces, amplifying the square's green character and providing generous spaces overlooking the public space at multiple levels; and the east, continuing the High Road frontage whilst representing a recognisable marker at the gateway to Scheme.



Illustrative representation of Plot E (right) and C (left) as described within the planning application (View 04)

8.10.6 **Plot F** - forms an active perimeter plot activating each of its surrounding streets and public spaces. To the north, the plot is deliberately set back to retain the existing mature trees along White Hart Lane, supporting the extension of the public realm improvements. The plot's tallest building will help define this nodal point within the wider townscape. Ground floor retail units will define the edge of the Scheme's prominent east-west route and help activate the prominent station arrival space. To the east, ground floor duplex homes will respond to the residential nature of William Street, creating a quiet tree lined streetscape.



Illustrative representation of Plot F and D as described within the Planning Application (View 05)

8.10.7 **Plot G** - completes the retained urban block, active ground floor uses offer activation to the generous public realm along White Hart Lane. The plot massing will form a stepping transition between the lower scale of the neighbouring heritage buildings and the taller buildings that define the Scheme. Similarly, the building's heritage informed architectural approach will represent a bridging between old and new.

8.11 **Summary of Key Points:**

- 8.11.1 The Planning Permission authorises necessary demolitions and comprehensive redevelopment of the Order Land.
- 8.11.2 The exact location and quantum of uses across the Scheme will be confirmed as reserved matters applications are determined.
- 8.11.3 The key aspects of the Planning Permission that inform the Scheme's design and placemaking are captured within three of the approved documents; the Development Specification, Parameter Plans and Design Code.
- 8.11.4 Plot A comprises two low-level blocks to form Whitehall Mews and deliver the first homes for the residents of the Love Lane Estate.
- 8.11.5 Plot B creates a defining transition between the existing residential buildings to the south and the Scheme's higher density living.
- 8.11.6 Plot C reinforces the civic nature of Moselle Square with a unified frontage of animated retail and leisure units with a spill out of activity supporting the community life of the space.

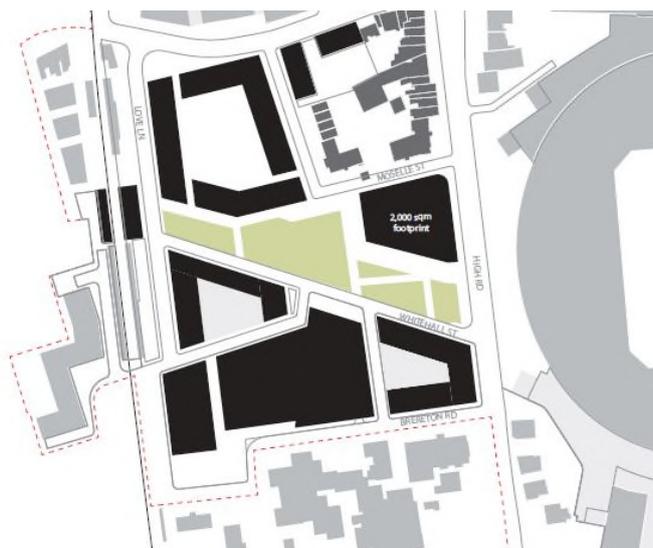
- 8.11.7 Plot D holds a pivotal position on the Scheme's two key vistas (east-west from the High Road, and north-south from White Hart Lane), delivering a prominent landmark building framing the station gateway and offering a wayfinding feature visible from across the masterplan and beyond.
- 8.11.8 Plot E plays a crucial role in the Scheme, housing a unique mix of community, leisure and commercial uses.
- 8.11.9 Plot F forms an active perimeter plot activating each of its surrounding streets and public spaces.
- 8.11.10 Plot G completes the retained urban block, active ground floor uses offer activation to the generous public realm along White Hart Lane.

9. RESPONDING TO DESIGN RELATED OBJECTIONS

- 9.1 As noted above, the Order enables the Council to acquire compulsorily the land shown pink in the Order Land [CD 1.2], in order to fulfil the policy aspirations of the planning framework, and facilitate the delivery of the Scheme, being Phase A of the Regeneration Scheme.
- 9.2 The Development permitted pursuant to the Planning Permission, delivers against the planning framework to realise its strategic ambition for the Order Land.
- 9.3 The following section seeks to respond to specific objections set out within the Statement of Case submitted on behalf of the Tryfonos Objectors [OBJ 03] and Mary Powell [OBJ 11] against the Order in relation to:
- 9.3.1 the removal of the existing High Road properties opposite the THFC Stadium and their requirement for inclusion in the Scheme; and
- 9.3.2 the removal of the five low rise residential blocks south of Whitehall Street and their requirement for inclusion in the Scheme.
- 9.4 **Transformative Tottenham:**
- 9.4.1 The redevelopment of THFC Stadium has provided a catalyst for change, delivering a contemporary anchor for the High Road and the area. The redevelopment of the High Road properties will complement and build on the success of this positive change, providing further community facilities and leisure and retail uses to cement the area's growing reputation.
- 9.4.2 The adopted planning framework clearly sets out the requirement for the development of Site Allocation NT5 to be brought forward in a comprehensive manner so as to optimise its transformative regeneration potential (see page 104 of the TAAP²).
- 9.4.3 Appendix B of the HRWMF³, presents a clear options appraisal ('the High Road Frontage Appraisal') that sets out the arguments for and against multiple scenarios for inclusion of the High Road properties. This comprehensive study identified option 6 as the preferred design approach (see extracted image below), establishing a clear rationale for the inclusion of the High Road properties.

² 'Tottenham Area Action Plan', July 2017

³ 'Tottenham High Road West Masterplan Framework', September 2014



Option 6 Masterplan Arrangement, High Road Frontage Appraisal, HRWMF, 2014

- 9.4.4 This early appraisal was key to establishing the Council's preferred approach in favour of removing the High Road properties. When approving the HRWMF, the Council concluded that including those properties would deliver the right opportunity for comprehensive redevelopment to create a meaningful gateway, local centre interface, destination public space, and high-quality homes and community facilities befitting a development of this scale and significance. Furthermore, the HWRMF identifies that bulkier building masses should be located towards the THFC Stadium to provide for larger leisure uses, with taller buildings used as part of a wayfinding and movement strategy and the end of east-west routes.
- 9.4.5 The existing buildings are of low density and scale, predominantly comprising three storey terraced properties. Due to the significance of this important part of the Order Land, comprising the proposed nodal heart of the new local centre, the area is considered suitable for intensification.
- 9.4.6 The release of this land offers the opportunity to increase the mix of non-residential uses, as well as the size and number of units, while delivering a critical mass of accommodation at this key destination and wayfinding node.
- 9.4.7 For these reasons including the land within the Scheme is considered critical to achieving the cumulative benefits of the Scheme. Opening the Order Land up to the THFC Stadium, via a generous new route between Plots C and E, facilitates a direct connection between these two primary areas of regeneration, linking High Road West to Northumberland Park to further realise the Council's ambition for integrating and connecting the major physical assets in the area (see page 46 of the TAAP⁴).

⁴ 'Tottenham Area Action Plan', July 2017

9.5 Reinventing the High Road:

- 9.5.1 The High Road has a rich and characterful history, long representing the social and economic centre of North Tottenham. In celebration of the road's heritage significance, it was designated a conservation area in 1972. While the High Road continues to represent the area's local centre, an ad-hoc approach to retail frontages, under-investment and issues relating to deprivation throughout the area, have meant that the road's heritage value and economic prosperity have been weakened.
- 9.5.2 Inclusion of the High Road properties within the Scheme delivers against the HRWMF principles (see page 92 of the HRWMF⁵), complimenting the scale and architectural character of the THFC Stadium development, enhancing the placemaking quality of this section of the High Road. The removal of the existing properties is necessary in order to frame and activate the streetscape, locate larger commercial and leisure uses opposite the THFC Stadium, and provide a more generous, comfortable and safe pedestrian environment, to create a new leisure destination at the heart of the community.
- 9.5.3 The High Road's heritage significance is also an important reference point, establishing the urban fabric from which to draw inspiration. The Illustrative Masterplan captures this sense of local character and the heritage of the place by retaining and enhancing the setting of key heritage buildings, to continue a sense of layered history throughout the area. New infill and replacement development respects and responds to the Conservation Area and neighbouring heritage buildings, creating a transition between the new and the old.
- 9.5.4 As noted previously, the Illustrative Masterplan locates the new Library and Learning Centre within Plot E, on the High Road. The importance of locating a community building on the High Road is supported by an understanding of the history of high streets, which demonstrate a tradition of locating the highest quality buildings on these major public routes and municipal corridors.
- 9.5.5 A new community, leisure and retail building within Plot E offers the opportunity to create a building that architecturally responds to the contemporary language of the THFC Stadium, creating a balance and unity across the High Road, combining to frame this gateway to North Tottenham. This complementary design approach directly responds to the HRWMF's aspiration for the community building (to be located on the High Road) and THFC Stadium to frame the key vista looking north, taking in the heritage of existing buildings alongside these contemporary statement buildings, assisting the wayfinding character and identity of the High Road (see page 126 of the HRWMF⁶).
- 9.5.6 Retention of the High Road properties, in contrast, would leave a barrier between the High Road and the new facilities and either force the community building to the rear of the

⁵ 'Tottenham High Road West Masterplan Framework', September 2014

⁶ 'Tottenham High Road West Masterplan Framework', September 2014

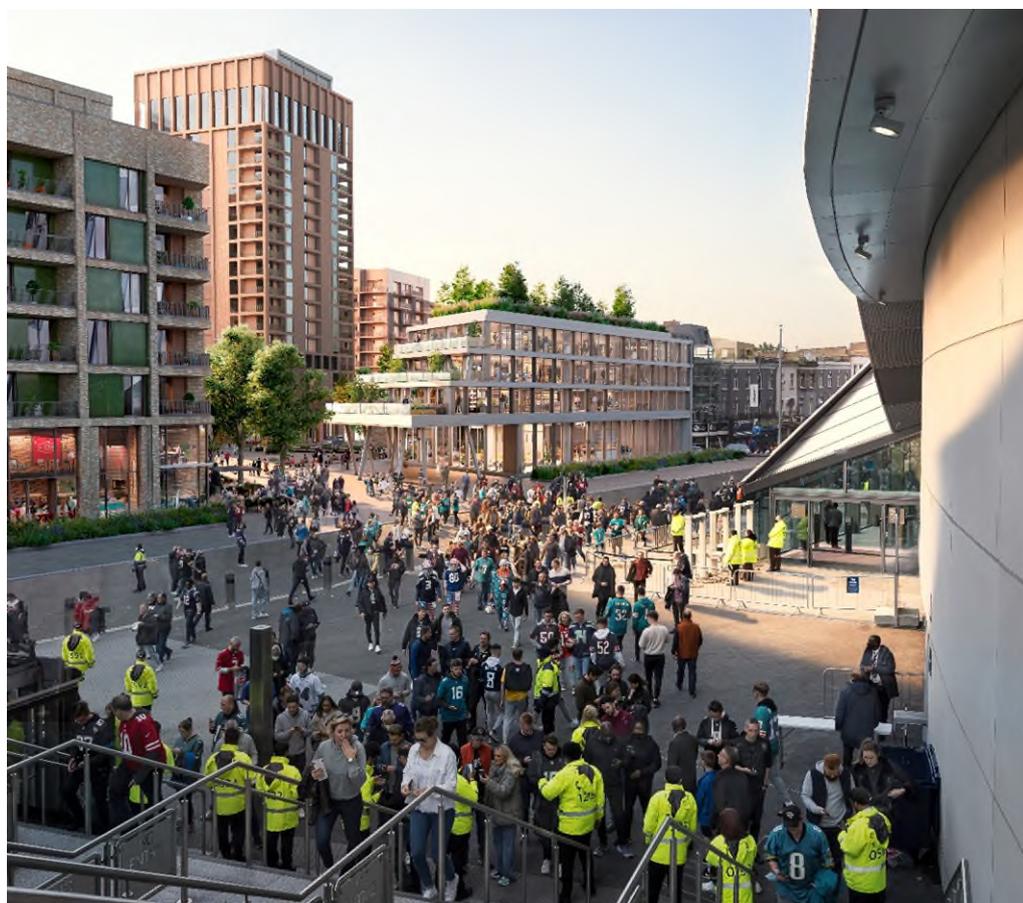
properties and further into the new Moselle Square (as identified within the High Road Frontage Appraisal) or require the facility to be provided within another development plot. The opportunity for the Scheme to deliver the most effective design approach and to fulfil both the Order Land's potential and the relevant Development Plan policies would be diminished. Retention of the existing High Road properties would therefore result in a missed opportunity for transformative change to this important high street.

9.6 **A complementary retail community and leisure offer**

- 9.6.1 Core to the Development Plan is the delivery of a Library and Learning Centre alongside a mix of community and leisure spaces. As detailed previously, the optimum location for this facility, from a design, community and commercial perspective, is on the High Road, directly opposite the THFC Stadium.
- 9.6.2 The location of the Library and Learning Centre in Plot E will complement the placemaking quality of the THFC Stadium development and create a cluster of community and leisure uses. Locating the Library and Learning Centre in Plot E will continue the legacy of the existing high street location (relocated from Combes Croft Library) while increasing the library's prominence and accessibility. The location in Plot E puts the Library and Learning Centre at the heart of the neighbourhood high street while also activating Moselle Square and offering an important frontage to the existing and new community.
- 9.6.3 Acquisition of the High Road properties enables the delivery of a wider range of larger, fit for purpose retail and food and beverage units befitting a local centre of this significance. The THFC Stadium, and associated future leisure uses, creates a place of regional significance. Alongside this iconic destination, the Scheme provides the opportunity to expand the existing local centre with high-quality public realm and a complementary mix of retail, community and leisure uses. A range of new uses will drive economic growth, helping existing and new businesses to thrive. The increased quantum of retail, leisure, community and cultural assets will draw a vibrant and mixed community to live, play, visit and work in the area, resulting in increased visitation and vitality.
- 9.6.4 Plot E offers the opportunity to provide the optimum location for the Scheme's largest amount of consolidated non-residential floor space, enabling the provision of larger capacity leisure facilities within a new building, reflecting the objectives of the Development Plan, while delivering a significant high-quality community asset to the area.
- 9.6.5 Plots E and C provide active commercial frontage onto the High Road and a generous pedestrianised opening into the heart of the neighbourhood. Retail frontages will frame the route into the centre of the Scheme, encouraging a flow of pedestrian movement from the High Road into the retail activity surrounding the new civic square. Both plots also offer the opportunity to deliver units with larger, contemporary floorplates, offering greater

resilience by facilitating flexibility and adaptability for a multitude of town centre uses over time.

- 9.6.6 Retention of the existing properties would require the community building and retail and leisure uses to be located to the rear of the High Road properties. Such a disconnected relationship and lack of physical and visual connection would limit the opportunity for symbiotic benefits between the community, leisure and commercial clusters, likely resulting in the uses surrounding the new public square missing out on the footfall along the High Road, compromising their social and commercial success. The High Road Frontage Appraisal further highlights that, due to the requirement to provide a generous public square, a building in this rear location would deliver a smaller footprint and reduced overall floorspace quantum. This would negatively impact the provision of much-needed community and leisure space to the neighbourhood.



CGI of High Road gateway to the Scheme, submitted as part of the Planning Permission (View 06)

9.7 Complimenting and enriching the existing urban grain:

- 9.7.1 One of the driving principles of the planning framework is the provision of a direct and animated route from the Station to the THFC Stadium, so as to deliver a high-quality arrival experience for this emerging regional destination, which fosters a sense of security,

comfort, ease of movement and an improved quality of public realm. This objective responds to the area's significant challenges in managing the behaviour and movement of large crowds on event days, as well as its noticeable lack of quality public realm, and negative perceptions of safety.

- 9.7.2 In order to overcome these challenging conditions, and to achieve the requirements of the Development Plan, the Scheme is required to deliver a highly considered public realm, incorporating the best practice principles of Secured by Design⁷. These requirements can only be fully met by removing the High Road properties, and replacing them with generous, safe, and pedestrian-first public realm, together with perimeter buildings that offer clearly defined public and private spaces, natural surveillance and activation of the streetscape.
- 9.7.3 The Scheme satisfies the applicable policy requirements by delivering a wide and open pedestrianised aperture onto the High Road, encouraging safe and comfortable pedestrian movement during the day and at night. Furthermore, both Plots C and E offer active commercial frontages onto both the High Road and the Station to THFC Stadium route, improving the perception of safety and acting to deter anti-social behaviour. Stitching into the network of streets surrounding the Order Land allows the Scheme to integrate with the existing townscape and established movement routes. A network of new streets creates a legible urban grain. Running behind the High Road, pedestrian orientated north-south links connect the new neighbourhood, while east-west routes offer important connections to surrounding communities, improving permeability, accessibility and connections between key community destinations. New streets promote a positive relationship between buildings and public realm, delivering a strong sense of place, accessibility, animation and legibility. All internal routes promote low car usage and speeds to prioritise pedestrian and cycle movement and encourage ground floor activities to spill out into the public space.
- 9.7.4 The new THFC Stadium attracts high numbers of visitors, including a broad array of regular and first-time visitors to the area. In order to facilitate an ease of arrival and access from the Station to THFC Stadium, safe and efficient crowd flow is fundamental. In response to paragraph 28 of the Statement of Case submitted on behalf of the Tryfonos Objectors Statement of Case [OBJ 03], the east-west connection, made possible by acquiring the High Road properties, will deliver the following physical and public benefits which are guided by clear design principles:
- **A direct line of sight from Station to THFC Stadium:** creating an impressive and welcoming experience and clear orientation for visitors who are new to the area, supporting safe and unobstructed movement;
 - **A car free pedestrian route lined with retail and commercial units:** offering activation of the public realm and opportunities to receive high footfall on event days, supporting the area's commercial prosperity;

⁷ 'Secured by Design, Homes, 2023

- **A pedestrian and cycle only route:** promoting safe pedestrian and cycle movement and limiting disruptions from vehicle movement on event days;
- **An unobstructed route with sufficient width:** offering flexibility along the route to manage the safe and efficient queuing and movement of crowds, while allowing for additional through-routes offering access for residents and the wider community during events; and
- **A sequence of generous and defined public spaces:** from the Station arrival, through Moselle Square, to the THFC Stadium landing, a sequence of spaces will allow for an ease of movement through the Scheme, clear wayfinding, as well as opportunities for a range of events and activities within the flexible public realm.

9.7.5 The Scheme responds to the above principles and the requirements of the planning framework to deliver improved east-west permeability and connectivity through the area with a pedestrian and cycle first approach.

9.7.6 The Scheme would be unable to deliver on those requirements if the existing High Road properties were to be retained, for the following reasons:

- The rear of the properties and associated service road are poorly overlooked, poorly lit, and poorly maintained, resulting in a perception of a lack of safety and opportunities for anti-social behaviour;
- The current access arrangements would require vehicles to cross the key pedestrian route, removing the ability to create a pedestrian environment;
- The THFC Stadium would not be as visible from the Station (and vice versa);
- The junction of Whitehall Street and High Road presents a narrow route between the two corner buildings, which creates a funnelling effect with little opportunity for improvements to crowd movement or the desired quality of public realm and sense of arrival;
- Existing pavement widths are restricted, causing pinch points and disruptions to ease of movement;
- The side elevations of the existing buildings facing Whitehall Street are unattractive and inactive. This narrow, unassuming and unappealing gateway to the new Moselle Square would do little to promote the use of, and footfall through, the Scheme's new public space; and
- Whitehall Street would be required, at least in part, to be retained to continue to offer servicing access to existing commercial uses. This would remove the aspiration for the route to be car free, creating a highly conflicted junction at what is intended to be a principal gateway to the Scheme. A requirement for vehicle access would significantly limit aspirations for safe, unobstructed pedestrian and cycle movement between Station and THFC Stadium.

- 9.7.7 In response to paragraph 28 of the Statement of Case submitted by the Tryfonos Objectors [OBJ 03], the Scheme has been carefully designed to facilitate a direct, and unobstructed, line of sight from the Station's primary exit on Love Lane through to the THFC Stadium. The north-eastern facades of Plots C and D, and south-western facades of Plots E and F have each been deliberately shaped to carve a clear line through the Order Land to facilitate this important vista, supporting the design and delivery of a safe and intuitively understandable route from the Station to the THFC Stadium. Due to the reasons explained, the route's considered design delivers clear public benefits for local residents and visitors to the area.
- 9.7.8 Furthermore, contrary to the Tryfonos Objector's [OBJ 03] claim that Plot F "may actually reduce any direct line of sight to the THFC Stadium when compared to the existing direct line of sight", it is observed that there is currently a very narrow and highly obstructed line of sight to the THFC Stadium, which would be significantly improved by the delivery of the Scheme. This limited existing line of sight is particularly compromised by the High Road properties, which significantly reduce the view through to the THFC Stadium. The removal of the High Road Properties, along with the existing Love Lane Estate buildings and obstructing public realm features, allows for the delivery of the proposed buildings framing the new route, each of which supports in guiding a clear line of sight towards the THFC Stadium and its principal points of arrival.



CGI of Station to Stadium route, submitted as part of the Planning Permission (View 04)

9.8 A generous open space defining the heart of the neighbourhood:

- 9.8.1 The adopted planning framework requires the delivery of a civic square and local centre focus, with a direct connection to the High Road and THFC Stadium.
- 9.8.2 The Scheme will introduce a new public open space (Moselle Square) at its heart, creating a lively destination and engaging space that promotes social interactions and healthy living. Moselle Square offers a generous space to celebrate community, leisure and nature, and will accommodate a mixed programme of activities to support the community's diverse social and cultural needs. Moselle Square is designed to encourage a vibrant and dynamic array of uses and activities, providing a platform for both THFC Stadium and community activities.
- 9.8.3 In order to deliver this 'place changing' new, high-quality, active public space, it is necessary to remove the High Road properties (see page 104 of the HRWMF⁸). By removing these properties, the combined land offers the opportunity to create a bridge and connection between the High Road and the new square, offering a crucial link to the activity of the THFC Stadium, greatly improving the attractiveness of the new Moselle Square to commercial occupiers and ensuring the vitality and viability of the public space and its surrounding uses. The success of this important conglomeration of active uses through strong connectivity and legibility is integral to the success of the Scheme, as well as its social and economic contribution to the wider area.
- 9.8.4 Moselle Square will be activated by the community building delivered within Plot E, which, as proposed within the Illustrative Masterplan, will offer visual connections (at ground floor level) to the High Road, supporting a sense of connection between the new square and High Road, encouraging people moving along the High Road to explore and engage in the life of the square. This sense of physical and visual connection not only encourages natural surveillance; it also responds to the ambition of the TAAP.
- 9.8.5 Retention of the existing High Road properties would unavoidably detach the square from the High Road and THFC Stadium. This disconnection (and the reduced access between the High Road and the new square) would likely result in lower footfall, use and activation of the public space, presenting a significant challenge to the success of the new retail and commercial uses surrounding it.
- 9.8.6 Therefore, while the High Road properties are not required for the physical location of Moselle Square, they are, for the reasons explained, required in order for the space to function in the way policy requires and as required in design and placemaking terms.

⁸ 'Tottenham High Road West Masterplan Framework', September 2014



CGI of animated and active Moselle Square, submitted as part of the Planning Permission (View 02)

9.9 Connected by green public realm:

9.9.1 The High Road is currently identified as having a low index performance against Transport for London's (TfL) Healthy Streets initiative's⁹ assessment of relative 'healthiness'. The comprehensive acquisition of the High Road properties will enable the Scheme to be set back from the High Road carriageway and existing building line. This design approach is a direct response to the Healthy Streets initiative:

- Create a street that is designed to prioritise pedestrians' needs;
- Create space for walking at the busiest times with suitable protection;
- Create an attractive, overlooked, well-lit and safe place to move along and wait for a bus;
- Ensure the building frontage onto the street is architecturally varied, animated and buildings are actively used by a wide variety of the community;
- Create space to introduce planting and trees to add colour, interest and a softening of the streetscape;
- Create space to introduce street furniture to encourage people to sit and inhabit the street in comfort.

⁹ 'Healthy Streets Qualitative Assessment', TfL, 2021

9.9.2 The Scheme will create a green public realm network with connected open spaces characterised by places to socialise, places to play, and places to interact with nature. The design approach directly responds to the existing poor condition of the High Road, which is characterised by a narrow and highly cluttered pavement, poor activation and ground level surveillance, low quality finishes and a muddle of dark and disjointed shop fronts. If the existing condition were retained, there would be little opportunity for placemaking improvements and to align with the project's exemplar placemaking ambitions and Healthy Streets agenda.

9.10 **An inclusive community for multi-generational living:**

9.10.1 Acquisition of the High Road properties to deliver Plot C within the Planning Permission offers the opportunity to provide a density of much needed – and mixed tenure – new high-quality homes. New homes will be designed to meet contemporary design standards, delivering comfortable and safe homes that are efficient to run and provide all residents with access to private and communal open space. New homes will be designed to create access to daylight, views of open space and shielding from sources of noise and air pollution, supporting residents' mental and physical wellbeing.

9.10.2 Retention of the existing properties along the High Road would result in the provision of fewer homes to the area. The residential units located over the existing commercial spaces will not have been designed to contemporary design standards, and therefore may present poorer quality homes than their contemporary comparators, with less variety in tenure and size of properties. Importantly, the existing properties do not provide residents with any private amenity space, and have not been designed with consideration to contemporary standards for resident safety and comfort, providing a poorer quality of residential experience and health outcomes.

9.11 **Key places of rich and varied character:**

9.11.1 As noted within the TAAP, development of Site Allocation NT5 should adopt a process of 'well managed change', balancing continuity of local distinctiveness and character, with the need for active living spaces and appropriate facilities to accommodate local community needs.

9.11.2 The ad hoc development of the individual plots has resulted in both the front and rear elevations of the properties appearing disjointed and of a poor aesthetic and architectural quality, adding little to the character of the High Road or its sense of place.

9.11.3 Retention of the existing properties would remove the opportunity to deliver an architectural bridge between new and old. Further refurbishments and improvements to the existing properties would do little to improve the townscape character of the High Road, retaining the existing disjointed juxtaposition with the THFC Stadium opposite.

9.12 The Alternative Proposal for Land South of Whitehall Street

- 9.12.1 Similarly to the approach to the High Road properties, the design rationale for the removal of the five low rise residential blocks to the south of Whitehall Street is grounded in the Order Land's adopted planning framework. The TAAP sets out the requirement for the development of Site Allocation NT5 to be brought forward as part of a comprehensive estate renewal programme to deliver a better mix of social housing, tailored to meet residents' housing needs (see page 32 of the TAAP [CD 3.5]).
- 9.12.2 The HRWMF reinforces this ambition, delivering a comprehensive scheme for full estate renewal, incorporating the removal of these five blocks. Together, these two documents establish the Council's clear aspirations for removing these properties in order to deliver high-quality homes, streets and commercial opportunities befitting a development of this scale and significance.
- 9.12.3 The existing buildings are of low density and scale, comprising an interconnected set of four storey blocks. Due to the allocation of these properties for full redevelopment, and the opportunity to deliver a significant number of high quality, affordable, new homes for the borough, the area is considered suitable for intensification.
- 9.12.4 Much like the incorporation of the High Road properties, the release of this land offers the opportunity to provide a density of much needed – and mixed tenure – new high-quality homes designed to meet contemporary design standards. Similarly, the inclusion of this land facilitates an increase in the mix of non-residential uses, as well as the size and number of units, whilst delivering a critical mass of accommodation.
- 9.12.5 Retention of the five residential blocks would result in the provision of fewer homes to the area. The residential units within the blocks will not have been designed to contemporary design standards, and therefore may present poorer quality homes to their contemporary comparators.
- 9.12.6 One of the Scheme's key placemaking principles is to compliment and enrich the existing urban grain. The retention of the existing properties removes the opportunity to deliver a new connection from Brereton Road through to Moselle Square. This important new connection improves the Scheme's permeability, encouraging an ease of movement through the Order Land, and connecting the heart of the Scheme to neighbouring communities.
- 9.12.7 Building on the assessment of the existing properties set out in section 4 of this proof, despite potential improvement works, the retention of these buildings would present an inactive and defensive frontage onto Moselle Square. The disjointed alignment and poor design quality of the buildings would conflict with the design ambitions and desired activation and framing of the Scheme's primary piece of public realm. Furthermore, exposing ground floor homes to such a public environment would significantly conflict with

Secured by Design principles and pose potential safety risks to residents with front doors opening directly onto a large civic square.

9.12.8 Similarly, retention of the existing blocks would do little to improve the quality of the streetscape along Brereton Road and Orchard Place, which would continue to be poorly activated and overlooked. Despite opportunities for landscape and public realm improvements, the cluster of homes would continue to form a closed and defensive block structure that is perceptually detached from the rest of the Scheme, sitting in stark contrast to the level of design and placemaking quality of the new development.

9.13 Summary of Key Points:

9.13.1 Based on this design and placemaking assessment, it is necessary to remove the existing High Road properties, in order to deliver the significant benefits associated with the Scheme. The Planning Permission and design approach deliver these benefits through the transformative opportunities presented by Plots E and C, allowing the Scheme to realise the following objectives of the adopted planning framework:

- The transformation of the High Road properties is a pivotal component of the Council's ambition to transform the North Tottenham Local Centre into a thriving 21st Century local centre.
- The Scheme's comprehensive masterplan approach is able to optimise the use of all of the Order Land to actively enhance and expand the life and activity of the High Road. This transformative approach elevates this key high street to become a major sports, leisure and community destination and contemporary mixed-use piece of city, delivering on the policy objectives of the HRWMF and the TAAP to deliver social, physical and economic regeneration to an area that currently experiences fundamental social and economic disadvantages.
- Appendix B of the HRWMF identified option 6 as the preferred design approach establishing a clear rationale for the inclusion of the High Road properties.
- There are clear cumulative benefits of a comprehensive development approach from a design and placemaking perspective, reinforcing the policy decision to promote the removal of the High Road properties as set out through the planning framework.
- Benefits to replacing the existing properties include the vibrant activation of the High Road to enhance and expand the local centre, delivering a mix of ground floor activating commercial and community focused uses that can host and blend retail, workspace, leisure and community uses.
- The re-development of the High Road properties compliments the scale and architectural character of the THFC Stadium, enhancing the placemaking quality of this section of the High Road, stitching it into a network of verdant public realm.

- New infill and replacement development will respect and respond to the Conservation Area, creating a transition between the new and the old.
- The vitality of the new mixed-use offer is underpinned by a critical mass of new homes and the expanded site allows for the location of these important uses on the major public route of the High Street.
- The re-development of the High Road properties enables the delivery of a wider range of larger, fit for purpose retail and food and beverage units befitting a local centre of this significance, allowing the Scheme to optimise both site capacity and design quality, offering the greatest possible environmental, social and economic benefits to the area.
- The re-development of the High Road properties retains the opportunity for the new Library and Learning centre to be located on the High Road.
- The layout which can be provided if the High Road properties are removed is open, inviting, and inclusive, with highly considered physical and visual connections between existing and proposed open spaces and community assets, inspiring a local centre lifestyle that combines social and community activity with civic and residential functionality.
- Secured by Design requirements can only be fully met by replacing the High Road properties with generous, safe, and pedestrian-first public realm, together with perimeter buildings that offer clearly defined public and private spaces, natural surveillance and activation of the streetscape.
- Removal of the High Road properties is essential to creating connectivity between the High Road, the new square, and the activity of the THFC Stadium in townscape and high quality design terms, greatly improving the attractiveness of the new Moselle Square to commercial occupiers, ensuring the vitality of the public space and surrounding uses.
- Retention of the High Road properties would remove the ability of the Scheme to meet the project's exemplar placemaking ambitions and Healthy Streets agenda.
- Retention of the High Road properties would result in the provision of fewer high-quality homes to the area.
- Further refurbishments to the existing High Road properties would do little to improve the townscape character of the High Road, retaining the existing disjointed juxtaposition with the THFC Stadium opposite.

9.13.2 Similarly, based on the assessment of the properties south of Whitehall Street it is equally necessary to remove the existing buildings to realise the range of physical and social benefits offered by the delivery of Plots B and C:

- The acquisition and demolition of the residential plots to the south of Whitehall Street are important in delivering the Council's ambition for comprehensive estate renewal.

- The existing properties are of low density and residential quality. Their retention would limit the delivery of a significant number of high-quality new homes.
- Retention of the existing residential blocks would compromise the quality of the frontage onto Moselle Square and do little to improve the activation and overlooking of surrounding public realm, whilst reducing the Scheme's overall permeability and integration with the wider urban grain.

10. ASSESSMENT OF THFC'S ALTERNATIVE MASTERPLAN

- 10.1 The need to remove the High Road properties in order to deliver the requirements of Site Allocation NT5 and facilitate the delivery of a transformative development is recognised by THFC [OBJ 08]. The delivery of its Alternative Masterplan is also reliant on the removal of the High Road properties.
- 10.2 As identified, the Alternative Masterplan concept design broadly follows the Scheme's plot and block structure for Plots A, B, D, F and G. The most significant changes have been applied to Plots C and E, which both propose extending the plots beyond the Planning Permission's maximum horizontal development extents. These significant deviations present a range of design challenges to achieving the Scheme's Overarching Placemaking Principles, as set out in section 7 of this proof. These design challenges include the following:

- Plot C, as presented by the Scheme, supports the principle of creating a complimentary, enriching and permeable urban grain. The definition of the plot's northern façade allows for a visually unobstructed and active route from Whitehall Mews through to the High Road. This design move supports permeability, encourages movement through the Order Land, and offers a greater sense of connection to the life of the High Road. The Alternative Masterplan's move to extend the northern façade terminates Whitehall Street, interrupting this key design principle, isolating Plots A and B from the active heart of the community.



HRW Phase A Scheme (left) and Alternative Masterplan (right) illustrating the termination of Whitehall Street

- Furthermore, by pushing Plot C's northern façade into Moselle Square, the Alternative Masterplan significantly reduces the size of this important public space, limiting its capacity to host a flexible range of activities and represent a generous local amenity space.

- This move further detracts from the Scheme's careful design approach to defining and animating pedestrian vistas. Instead, a number of the new routes within the Alternative Masterplan are terminated by blank and unconsidered facades, detracting from their quality of placemaking.



HRW Phase A Scheme (left) and Alternative Masterplan (right) illustrating terminations to pedestrian vistas

- The Scheme's design approach to Plots E and C responds to neighbouring heritage assets and the character of the surrounding conservation area to create a bridge between old and new, particularly supporting the linearity of the High Road frontage. In contrast, the Alternative Masterplan's realignment of Plot E and curved frontage of Plot C, does not consider the heritage character of the High Road, with Plot C in particular, sitting in stark contrast to neighbouring heritage assets.
- The Alternative Masterplan's new plot arrangement limits the length of frontage onto Moselle Square, reducing the number of ground floor active uses that can frame and inhabit the space.
- The Alternative Masterplan's locates the Library and Learning Centre within the Grange, away from the High Road.
- The Scheme has been designed to clearly define a sequence of nodal spaces connected by activated linear routes. The Alternative Masterplan conversely creates a series of poorly defined spaces with little differentiation between spaces and routes. This arrangement moves away from a clearly defined central public square, to create an elongated and undefined 'town square street' that detracts from the clarity of the use and programming of the public realm.
- Furthermore, the illustrative representation of enclosed trees at the centre of the Alternative Masterplan precludes the delivery of a flexible public space.

- Similarly, the Alternative Masterplan's proposed access and movement strategy is unclear as to how each of the plots, and individual blocks within them, will be appropriately serviced, and adhere to fire access requirements.
- The Scheme has been carefully designed to deliver good sun and daylight conditions to Moselle Square. Taller buildings on Plot C in particular are linked by lower blocks, allowing for good levels of light penetration through the plot. Conversely, while the Alternative Masterplan's proposed massing on Plot C may be lower, the building's large single mass (which is significantly taller than the Scheme's lower blocks) may not deliver the sun and daylight improvements stated. Further testing is required to determine this design outcome.

10.3 Due to the challenges posed by these alterations, it is considered that the Alternative Masterplan's revised plot and block structure presents significant disadvantages to achieving the Scheme's successful placemaking. Therefore, while the Alternative Masterplan is dependent on the removal of the High Road properties, substitution for these proposals would be harmful to the successful placemaking and design quality delivered by the Scheme.

11. SUMMARY AND CONCLUSIONS

- 11.1 This proof of evidence sets out my experience in the profession and on the project, along with detailing a range of further regeneration projects undertaken by SEW that are of a similar scale and complexity. This establishes both mine, and the practice's, extensive involvement in the scheme, and experience in exemplary regeneration masterplanning.
- 11.2 The evidence goes on to introduce the wider High Road West development area within the context of London and Haringey, establishing its strategic, and well-connected location at the heart of North Tottenham. This is followed by a comprehensive assessment of the Order Land, identifying its existing condition, challenges and influence on the experience of the place.
- 11.3 Following this assessment, the evidence introduces the core planning policy documents which form the planning framework on which the design brief, approach and proposals were developed. As identified, the project design brief positively reflected the Council's ambitions set out across these documents, establishing the key parameters and development objectives to be delivered by the evolving Scheme. Importantly, the project brief established the vision for Scheme, which would remain consistent throughout its design evolution.
- 11.4 Following the confirmation of the project brief, the evidence details how the Scheme has evolved throughout the design development process. It highlights how the design brief and the design development evolved from a clear understanding of the place, its policy context, and in response to extensive stakeholder engagement, to create a Masterplan that best fulfils this strategic vision, and shapes a sustainable and placemaking focussed future for the Order Land.
- 11.5 The resulting design approach and Illustrative Masterplan are presented as a testament to this dedicated and highly informed design methodology, raising the strategic objectives of the Council, and informed by consultation with key stakeholders and local community, while creating an exemplary regeneration masterplan built on a set of comprehensive placemaking principles.
- 11.6 Finally, the evidence seeks to comprehensively respond to the design related objectives to the Order, particularly in relation to the removal of the existing High Road properties. The evidence outlines how the design proposals will fulfil the Scheme's formative placemaking principles, whilst importantly explaining how the retention of the existing properties would, conversely, severely undermine the ability to achieve these fundamental outcomes. This clear justification establishes the rationale for the acquisition and demolition of the existing properties.

12. STATEMENT OF TRUTH AND DECLARATION

- 12.1 This proof of evidence which I have prepared and provided for this compulsory purchase Public Inquiry, is true and I confirm that the opinions expressed are my true and professional opinions.