

**Tottenham Hotspur Football Club**

## High Road West: Compulsory Purchase Order Rebuttal Proof of Evidence

Reference: Issue 1

30<sup>th</sup> October 2023



© Arup

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

Job number 278880-00

**Ove Arup & Partners Limited**  
8 Fitzroy Street  
London  
W1T 4BJ  
United Kingdom  
[arup.com](http://arup.com)

# Rebuttal Proof

<b>Project title</b>	Sophie Camburn: Rebuttal evidence to CD9.7 Lucas Lawrence Proof
<b>Job number</b>	278880-00
<b>File reference</b>	
<b>cc</b>	
<b>Prepared by</b>	Sophie Camburn
<b>Date</b>	30 October 2023

8 Fitzroy Street London W1T 4BJ United Kingdom

t +44 20 7636 1531

[arup.com](http://arup.com)

---

## 1. Introduction

- 1.1 I am a Sophie Camburn, a Director of Arup. I hold a Masters in Architecture from St John's College Cambridge and Master of Science in Cities, Space and Society from the London School of Economics. I have been a member of the Royal Institute of British Architects (RIBA) and on the Architects Registration Board (ARB) since January 2001 and am a Fellow of the Royal Society of Arts (FRSA). I first joined Arup in 2008. Prior to this I was an Associate at Alan Baxter & Associates and an Architect at Penoyre & Prasad Architects.
- 1.2 This rebuttal proof of evidence relates to urban design issues associated with the CPO scheme. This rebuttal responds to various points made in the proof of Lucas Lawrence, Core Document 9.7.
- 1.3 In this rebuttal, I do not respond to each and every point on which I disagree but rather to those points where I consider that the Inspector would be assisted by a written response. A lack of response to any specific point should not be taken as evidence that I accept it. Where reference is made to specific figures, these are within Appendix A of this rebuttal proof.
- 1.4 The evidence contained within this Rebuttal Proof of Evidence is true to the best of my knowledge. In submitting this Rebuttal Proof, I confirm that I have complied with my professional requirements as set out in the RIBA Code of Professional Conduct and the Arup Code of Ethics, which require me to act with competence, honesty and integrity, and exercise independent professional judgement at all times.

2. Rebuttal

2.1 For clarity, in the tables below I set out Mr Lawrence’s evidence as presented, along with my rebuttal evidence.

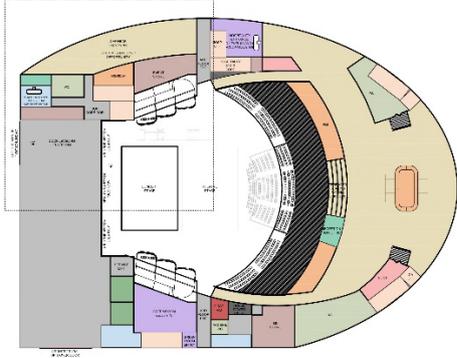
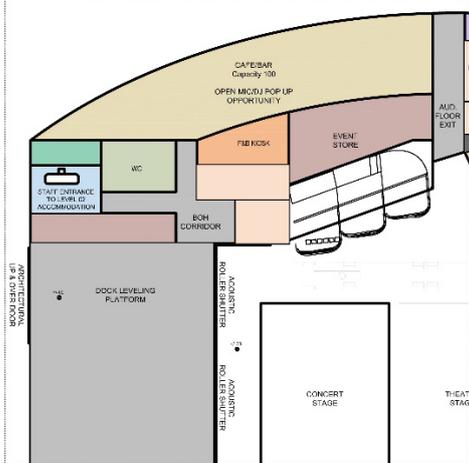
<b>Paragraph 10.2, bullet point 1, p.53</b>	
<b>Studio Egret West</b>	<p>Plot C, as presented by the Scheme, supports the principle of creating a complimentary, enriching and permeable urban grain. The definition of the plot’s northern façade allows for a visually unobstructed and active route from Whitehall 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.</p>
<b>Response</b>	<p>In the Alternative Masterplan scheme, Plot C has been sited so as to maintain a view of the stadium beyond. As demonstrated by Mr Lawrence’s diagram, Plot C does not prohibit direct views through the site. Indeed, the presence of the multi-functional events space within Building C creates an intermediate node between Plot A and the stadium, creating a draw towards Moselle Square and the activity provided by the frontage of Plot C onto the Square. Plot C in the Alternative Masterplan promotes a sense of permeability, attraction and connection with the Stadium beyond.</p> <p>Figures 1 and 2 in Appendix A illustrate how the Flexible Event Venue illustrative plan activates the façade that is in view from Whitehall Street, with a staff entrance that would be in use at all times of the day and evening.</p> <p style="text-align: center;">Flexible Event Venue Illustrative Plan</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>Figure 1: Illustrative Ground Floor Plan</p> </div> <div style="text-align: center;">  <p>Figure 2: Illustrative Ground Floor Plan, Zoomed in</p> </div> </div>

Figure 3 provides an illustrative view from Whitehall Street using the proposed massing in the Alternative Masterplan. The curved façade of Plot C clearly frames views towards the High Road.

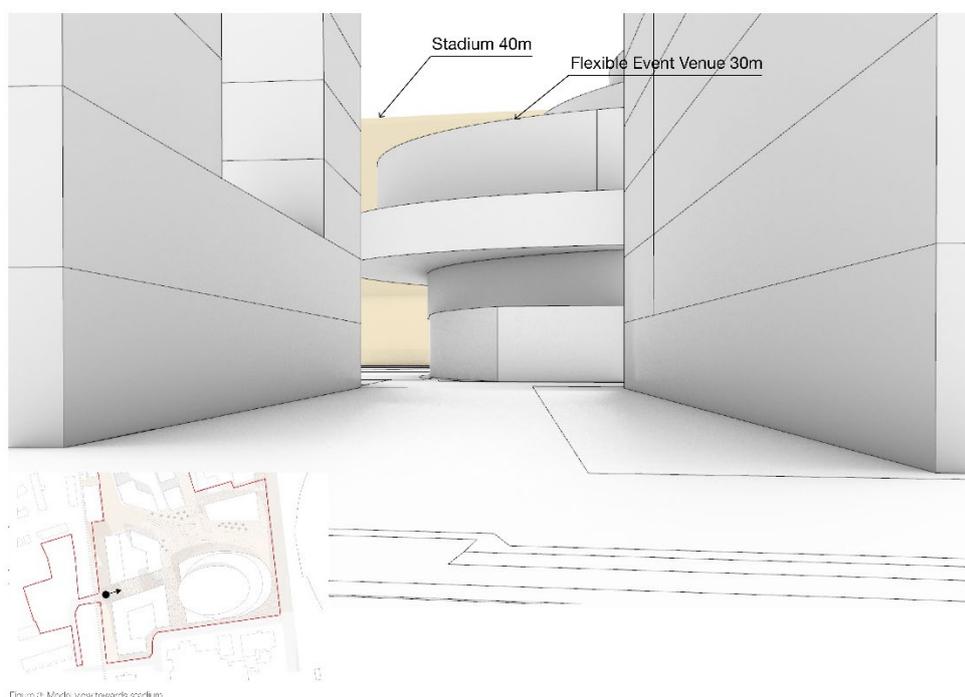


Figure 3: Model view towards stadium

**Paragraph 10.2, bullet point 2, p.53**

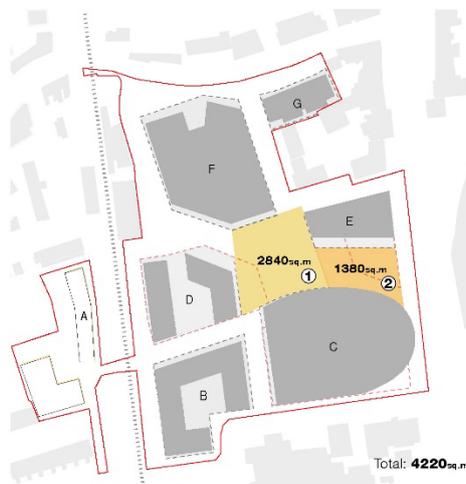
**Studio Egret West** Furthermore, by pushing Plot C’s northern façade into Moselle Square, the Alternative Masterplan significantly reduces the size of this important public space, limiting its capacity to host a flexible range of activities and represent a generous local amenity space.

**Response** Plot C has been carefully designed to enhance Moselle Square, by providing community functions on the northern side which can spill out into the Square. This provides a greater sense of activity within the Square and supports wider community functions. Plot C would be clearly seen from the High Road, with the curved form creating a welcoming and prominent entrance to the Square. The inclusion of the multi-functional events space in this location and form creates a destination in North Tottenham. In the CPO scheme, Moselle Square takes the form of a traditional residential square which is unlikely to act as a destination in its own right. In addition, the scale and form of Plot C in the Alternative Masterplan provides a greater sense of space around the square, allowing the square to ‘breathe’ and better responding to the scale of the stadium on the opposite side of the High Road.

Figure 4 identifies Moselle Square ‘1’ which is defined by Plots C, D, E and F, and is 2,840 sqm in the Alternative Masterplan. The rotation of Plot E by 90 degrees allows for an extension of public space (Moselle Square ‘2’) as illustrated in Figure 4, which provides an additional 1,380 sqm of

flexible public realm, making a total of 4,220 sqm of public space. This is greater than the 3,970 sqm of public space at Moselle Square in the CPO scheme shown in Figure 5.

Alternative Masterplan Dimensions



HRW PP Dimensions

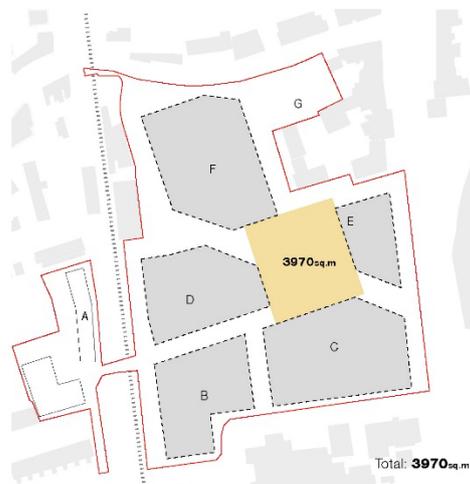


Figure 4: Alternative Masterplan Area

Moselle Square 1 Area: 2840sq.m  
 Moselle Square 2 Area: 1380 sq.m  
 Total Area: 4220 sq.m

Figure 5: HRW PP Masterplan Area

Moselle Square Area: 3970 sq.m

**Paragraph 10.2, bullet point 3, p.54**

**Studio Egret West**

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.

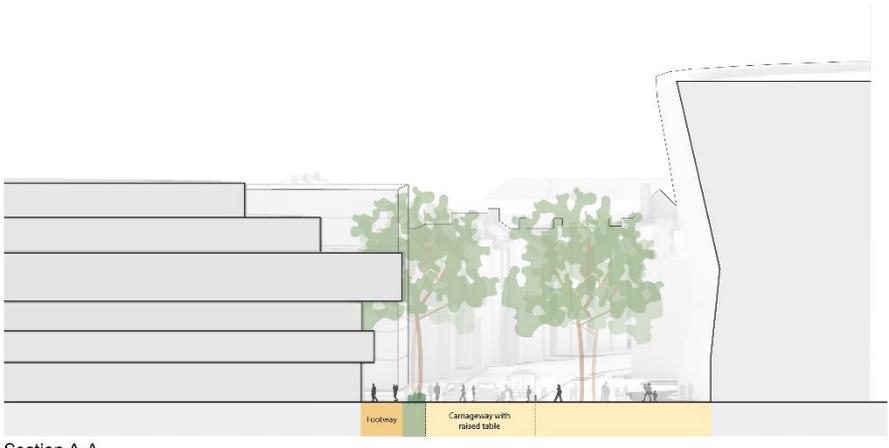
**Response**

Mr Lawrence’s diagram indicates a number of red lines to demonstrate this point. However, I disagree with his assessment. In terms of the western most view, far from terminating in a blank façade, this view provides a clear vantage point to the station which is a positive move in terms of wayfinding. The east-west view highlighted provides a positive view to the destination of the multi-functional events space (as discussed above). The eastern most view towards Plot F does not terminate in a blank façade but instead provides a view into the vibrant landscape of the courtyard garden beyond. In the Alternative Masterplan, this view is enhanced by the re-siting of Plot D.

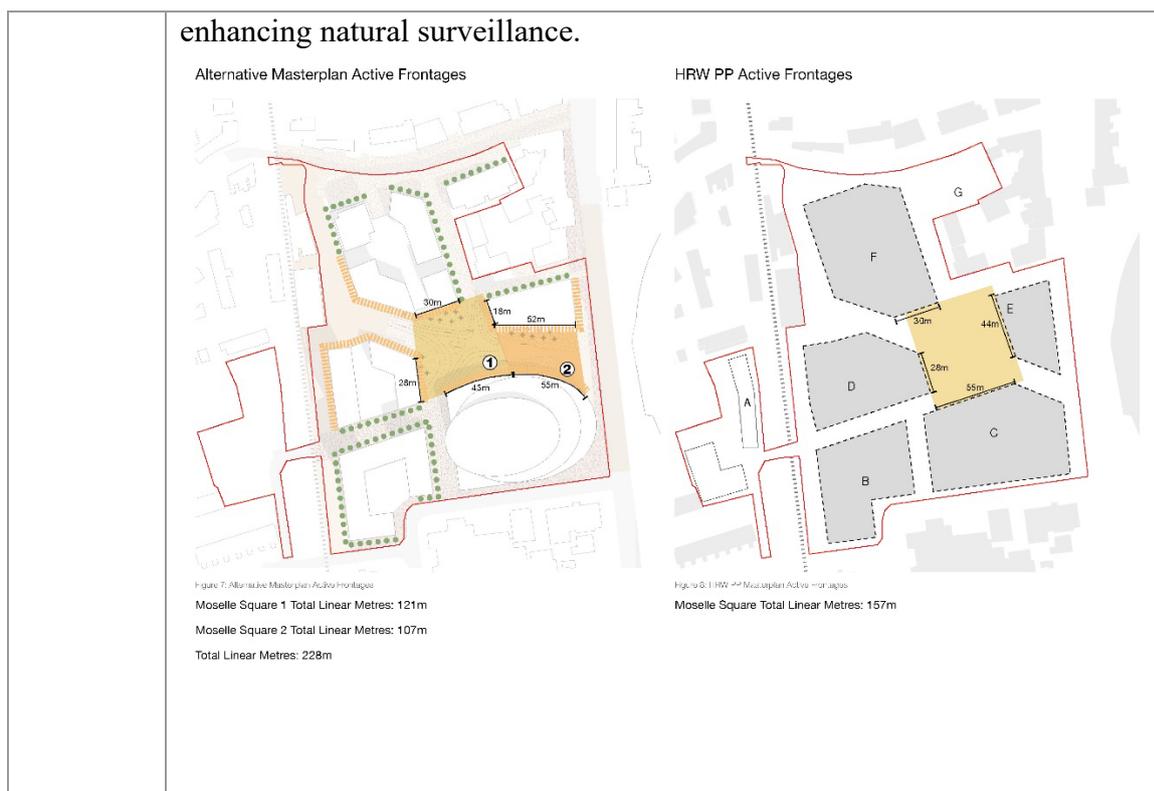
**Paragraph 10.2, bullet point 4, p.54**

**Studio Egret West**

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.

<p><b>Response</b></p>	<p>In the Alternative Masterplan, Plot E successfully creates a transition between a modern housing block and the new Moselle Square (NB. There is no heritage asset on this side of the square).</p> <p>In the Alternative Masterplan, Mr Lawrence’s critique of Plot C as being in ‘stark contrast’ to the neighbouring heritage assets fails to recognise the presence of the Stadium on the opposite side of the High Road and the need for a building which appropriately addresses this, by augmenting the sense of destination and scale. Figure 6 shows an illustrative section through the High Road. The curved frontage of Plot C in the Alternative Masterplan provides a greater sense of space along the High Road, opening up views of the church to the south and enhancing the setting of this heritage asset.</p>  <p>Section A-A</p> <p>Figure 6: Section through flexible event venue and stadium</p>
------------------------	--

	<p><b>Paragraph 10.2, bullet point 5, p.54</b></p>
<p><b>Studio Egret West</b></p>	<p>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.</p>
<p><b>Response</b></p>	<p>Diagram Fig 7 (below) illustrates the benefits of a re-oriented Plot E in the Alternative Masterplan, which allows for additional active frontage of 107 metres overlooking Moselle Square – this is annotated as area ‘2’ on the diagram. In addition to active frontages overlooking Moselle Square (area ‘1’ on the diagram), this gives a total of 228 m length of active frontages. This would result in 71 metres more active frontage than the CPO masterplan (which currently shows 157m overlooking Moselle Square).</p> <p>In addition, the quality of the frontage and the variety of uses is greater in the Alternative Masterplan due to the inclusion of the multi-functional events space. This use creates a long tail of activity into the evening and provides an out of hours function, giving the square more vibrancy and</p>



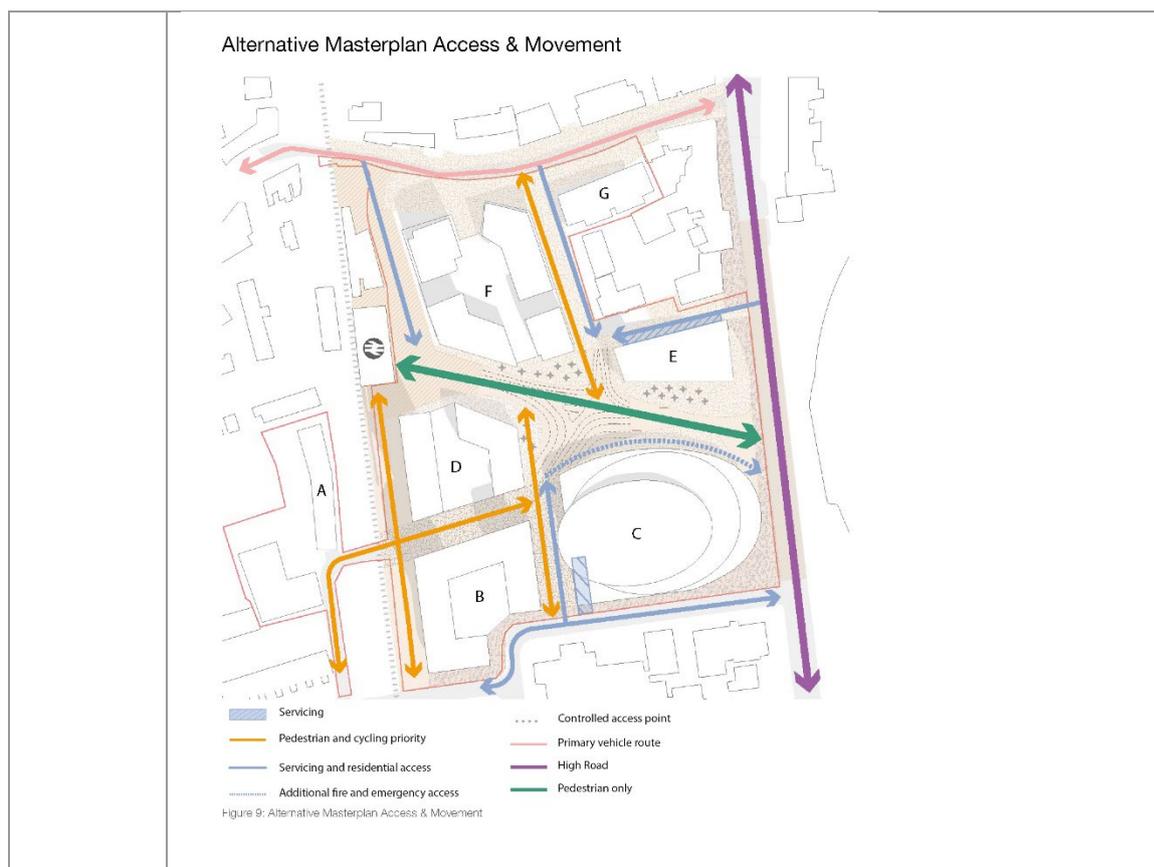
	<b>Paragraph 10.2, bullet point 6, p.54</b>
<b>Studio Egret West</b>	The Alternative Masterplan’s locates the Library and Learning Centre within the Grange, away from the High Road.
<b>Response</b>	In the Alternative Masterplan, the siting of the Library and Learning Centre into the Grange helps bring an underutilised heritage asset back into viable long-term use. It will be sited on a prominent frontage on White Hart Lane, connected into the surrounding residential uses for the benefit of the community.

	<b>Paragraph 10.2, bullet point 7, p.54</b>
<b>Studio Egret West</b>	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.
<b>Response</b>	In the CPO scheme, the siting and form of the central square creates an inward-looking design which fails to recognise the prominence of the route between the station and the High Road. The generosity of the Alternative Masterplan creates a range of spaces along the route - recognising its

	function as a destination on the High Road, and accommodates crowd flow requirements for match days.
--	--

	<b>Paragraph 10.2, bullet point 9, p.54</b>
<b>Studio Egret West</b>	Furthermore, the illustrative representation of enclosed trees at the centre of the Alternative Masterplan precludes the delivery of a flexible public space.
<b>Response</b>	The inclusion of trees has multiple significant benefits to the public space; creating a liveable urban space, addressing biodiversity, enhancing the microclimate, addressing the urban heat island and improving resilience to future climate change. The Square adequately caters for crowd flow and provides a functional flexible space, whilst also providing the benefits provided by the tree planting. In the CPO scheme, the Square appears as a stark, empty space.

	<b>Paragraph 10.2, bullet point 10, p.55</b>
<b>Studio Egret West</b>	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.
<b>Response</b>	Figure 9 illustrates how the Alternative Masterplan has considered servicing and emergency access for all plots.



	<b>Paragraph 10.2, bullet point 10, p.55</b>
<b>Studio Egret West</b>	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.
<b>Response</b>	Plot C has been designed as a sculpted building, the final form of which will optimise daylight and sunlight to Moselle Square. There is no considered to be any material difference in this regard between the CPO scheme and the Alternative Masterplan.

### 3. Appendix A (overleaf)

# **THFC Alternative Masterplan Appendix A**

October 2023

# Flexible Event Venue Illustrative Plan

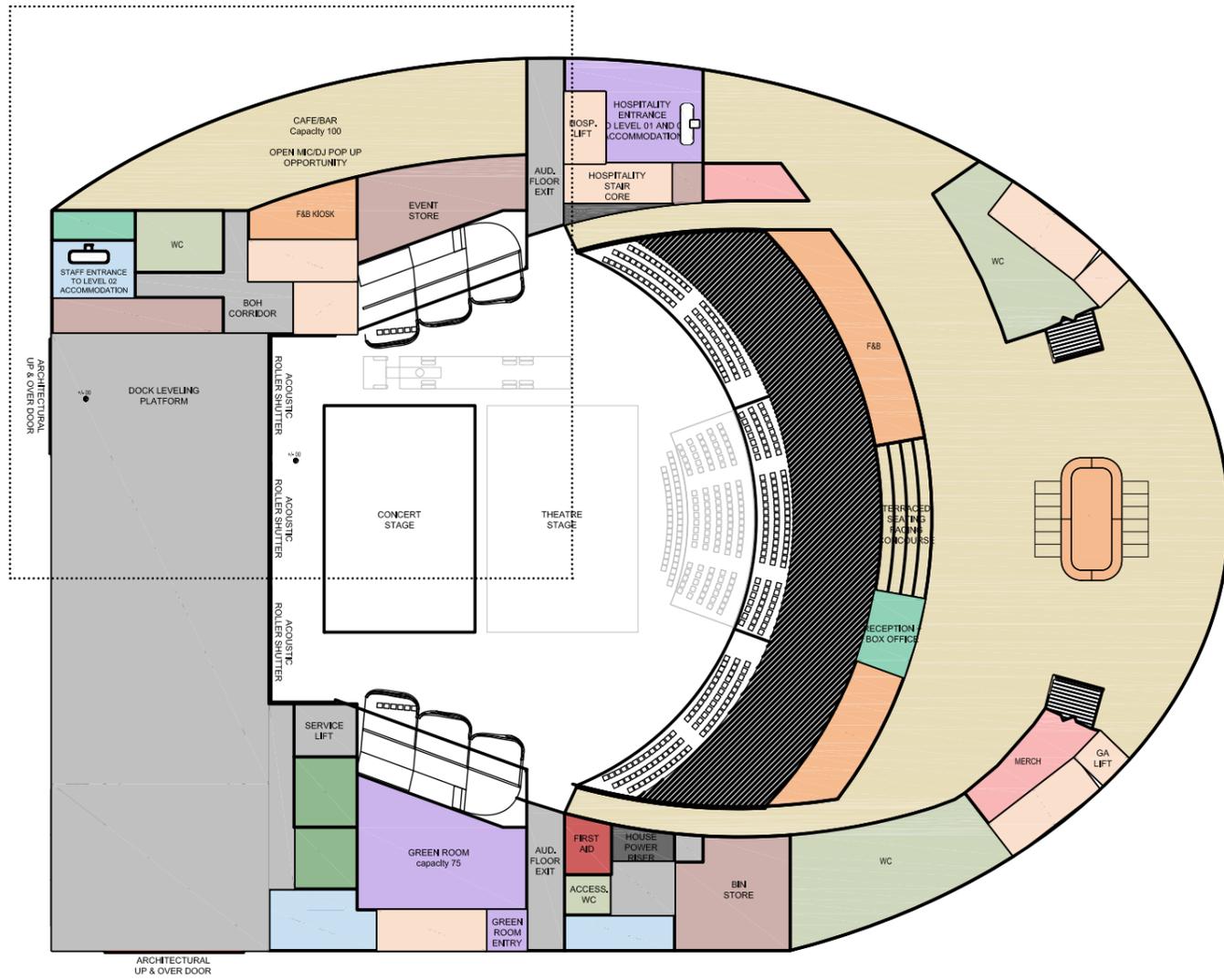


Figure 1: Illustrative Ground Floor Plan

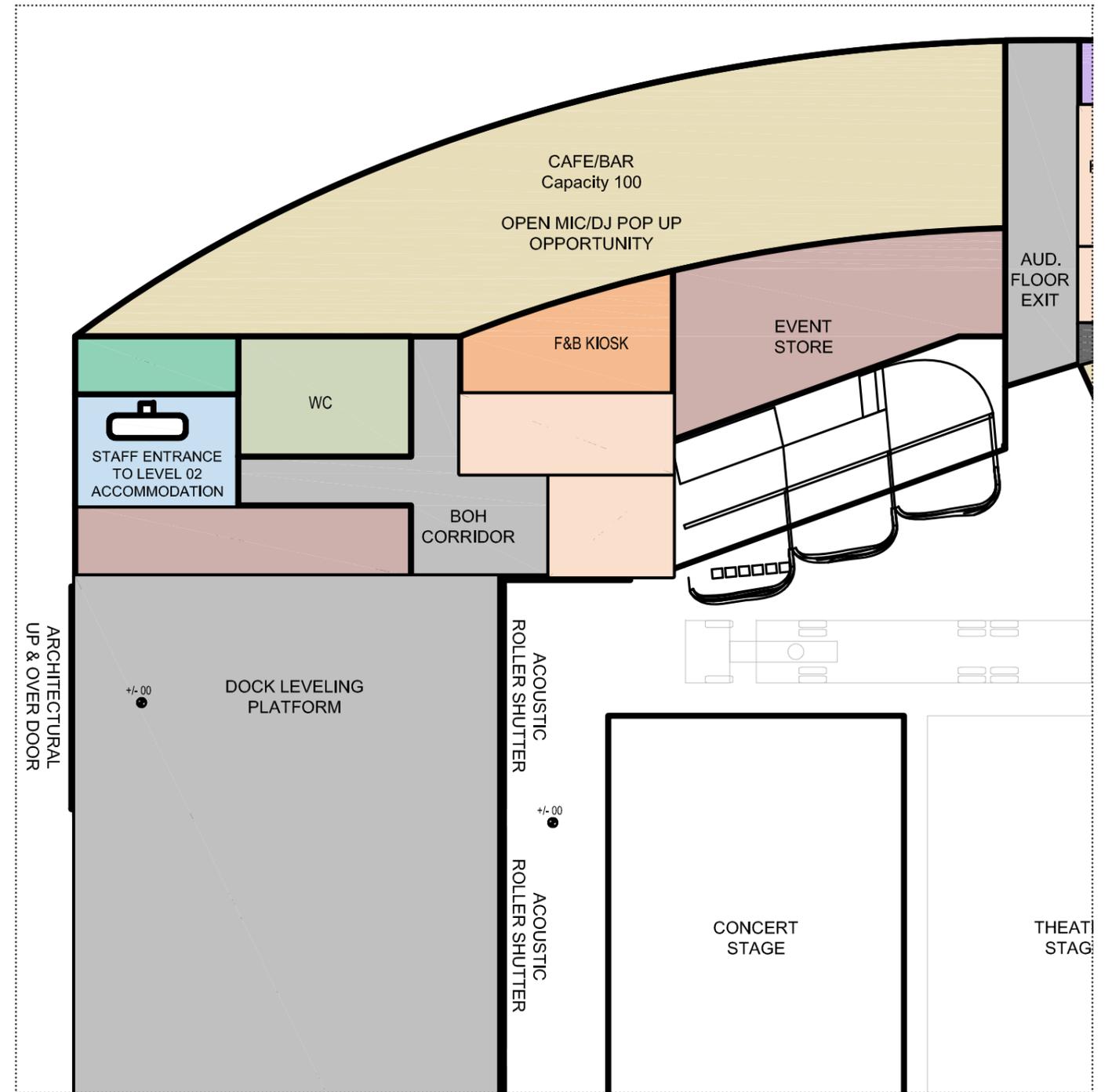


Figure 2: Illustrative Ground Floor Plan Zoomed in

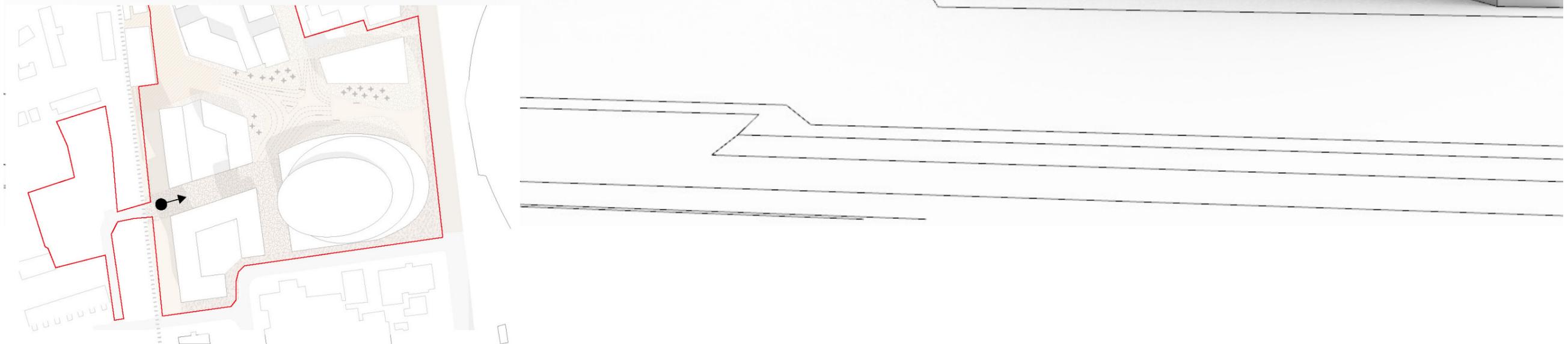
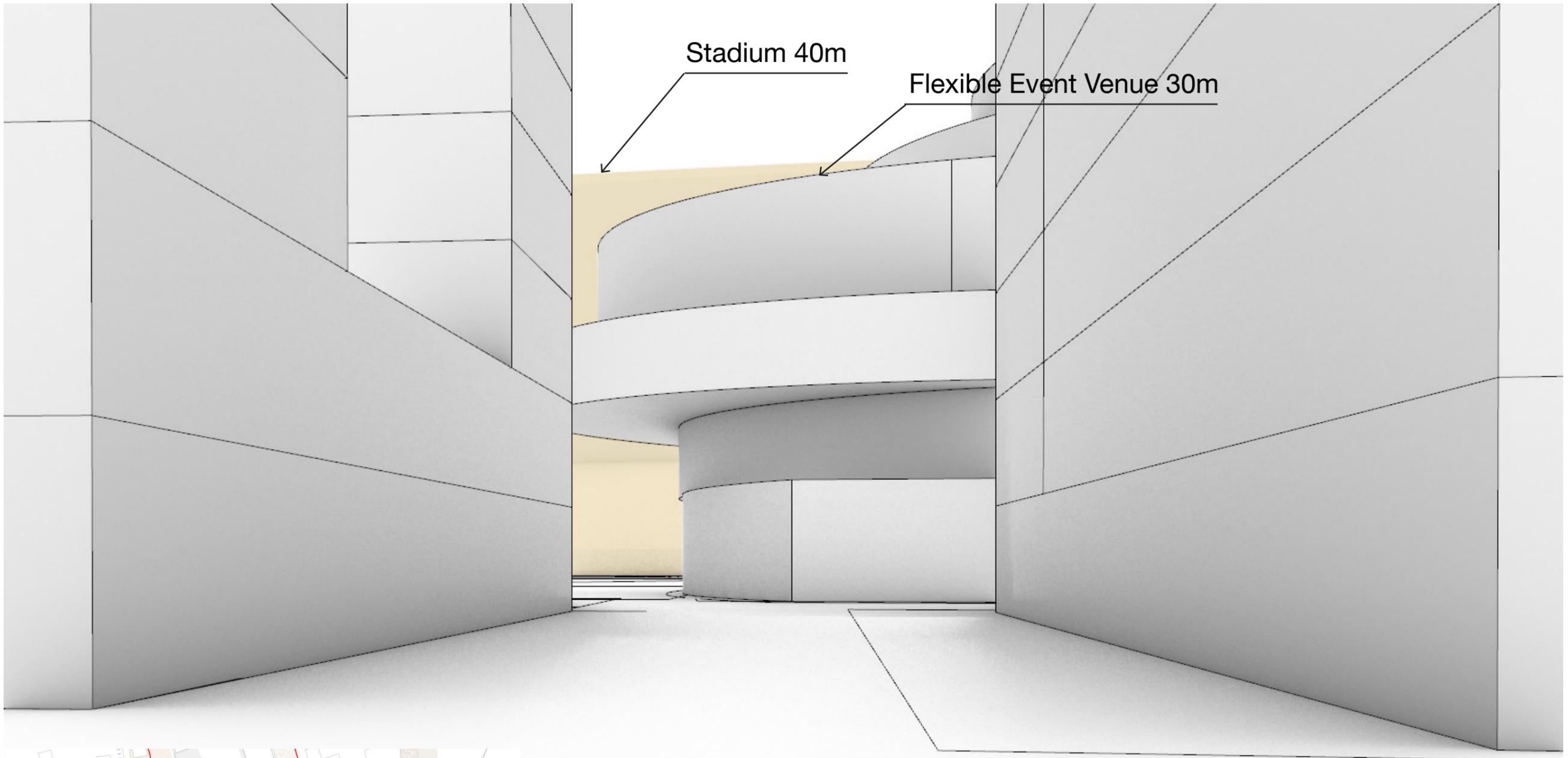


Figure 3: Model view towards stadium

## Alternative Masterplan Dimensions

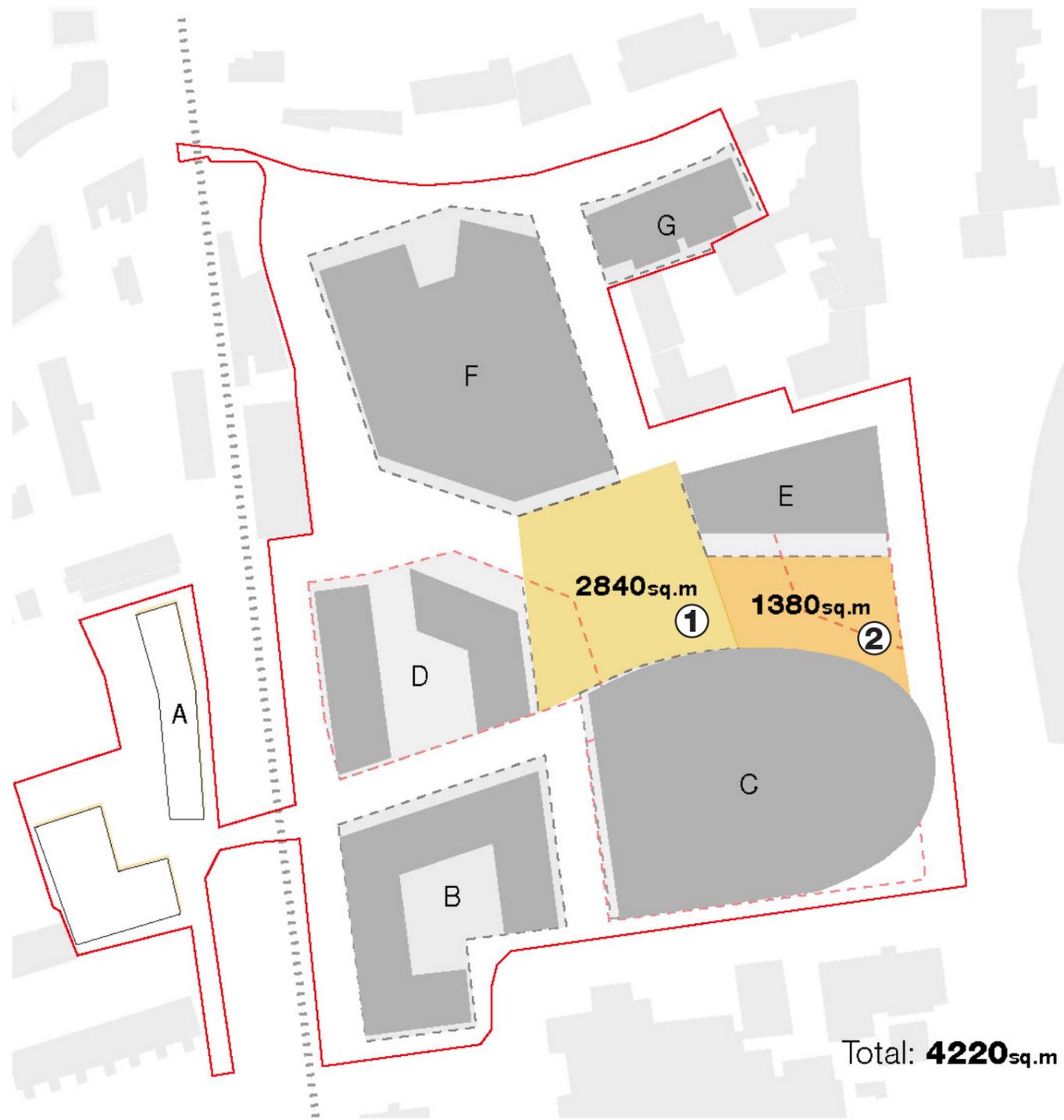


Figure 4: Alternative Masterplan Area

Moselle Square 1 Area: 2840sq.m

Moselle Square 2 Area: 1380 sq.m

Total Area: 4220 sq.m

## HRW PP Dimensions

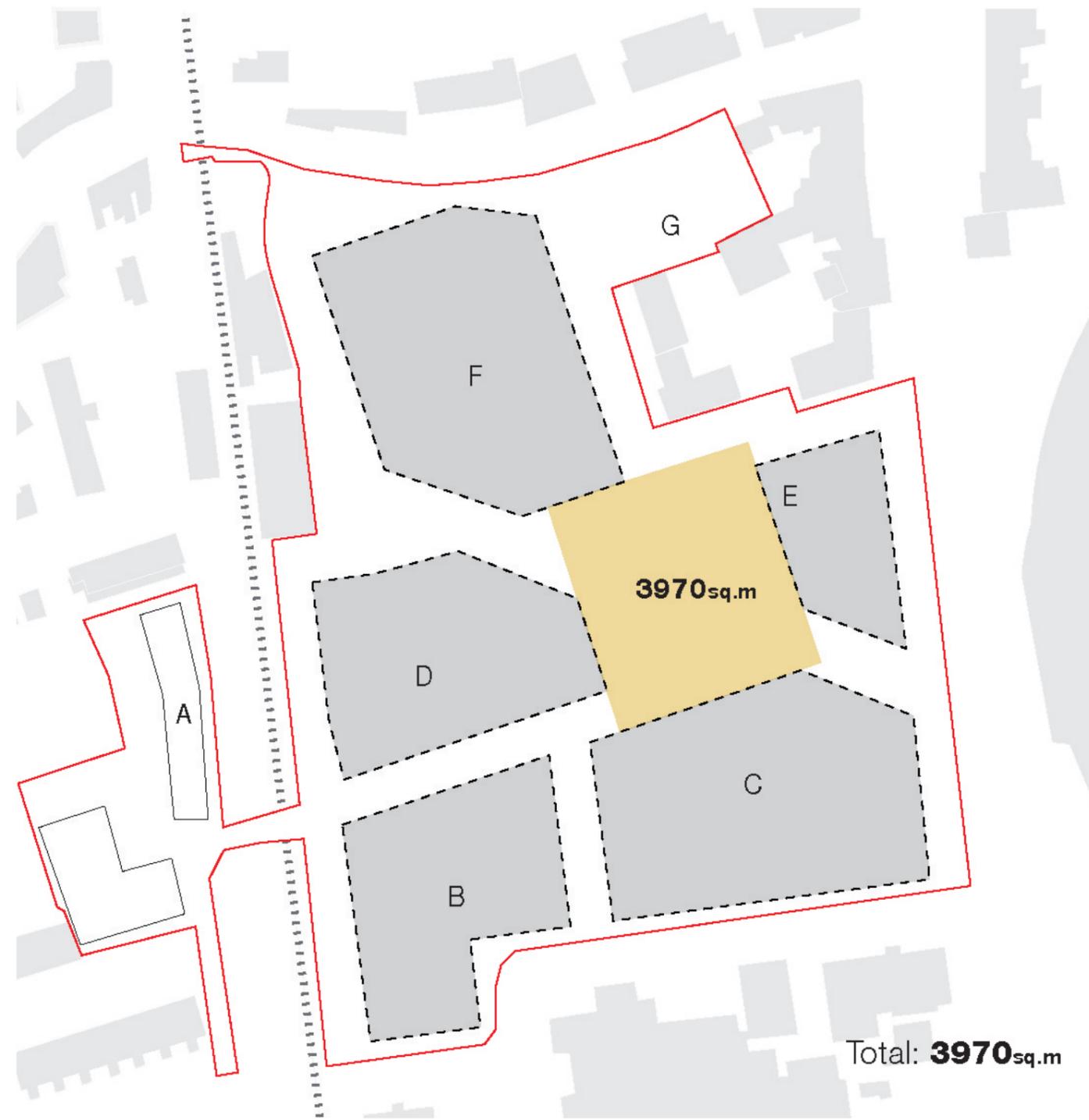


Figure 5: HRW PP Masterplan Area

Moselle Square Area: 3970 sq.m



Section A-A

Figure 6: Section through flexible event venue and stadium

## Alternative Masterplan Active Frontages

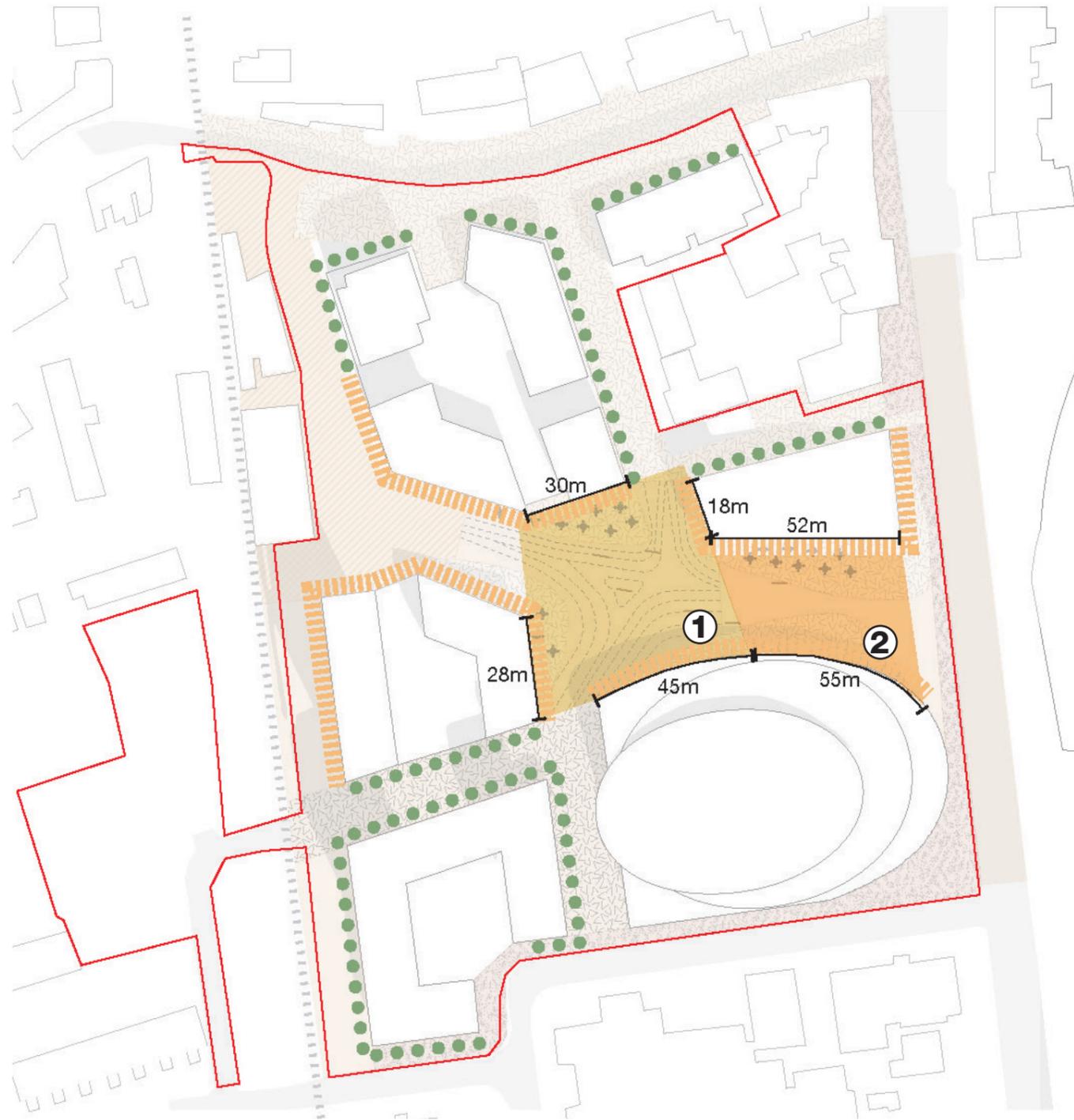


Figure 7: Alternative Masterplan Active Frontages

Moselle Square 1 Total Linear Metres: 121m

Moselle Square 2 Total Linear Metres: 107m

Total Linear Metres: 228m

## HRW PP Active Frontages

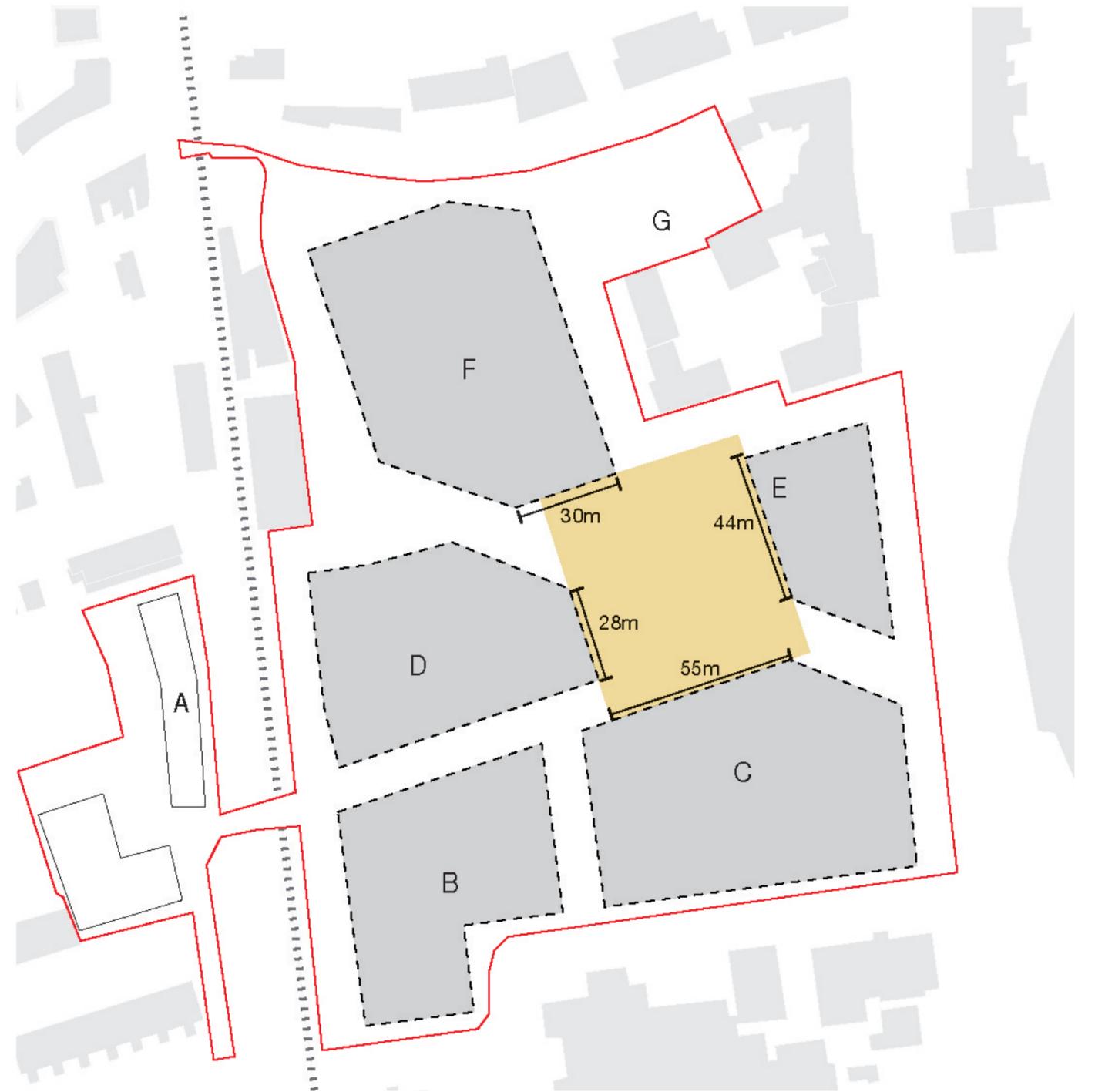


Figure 8: HRW PP Masterplan Active Frontages

Moselle Square Total Linear Metres: 157m

# Alternative Masterplan Access & Movement

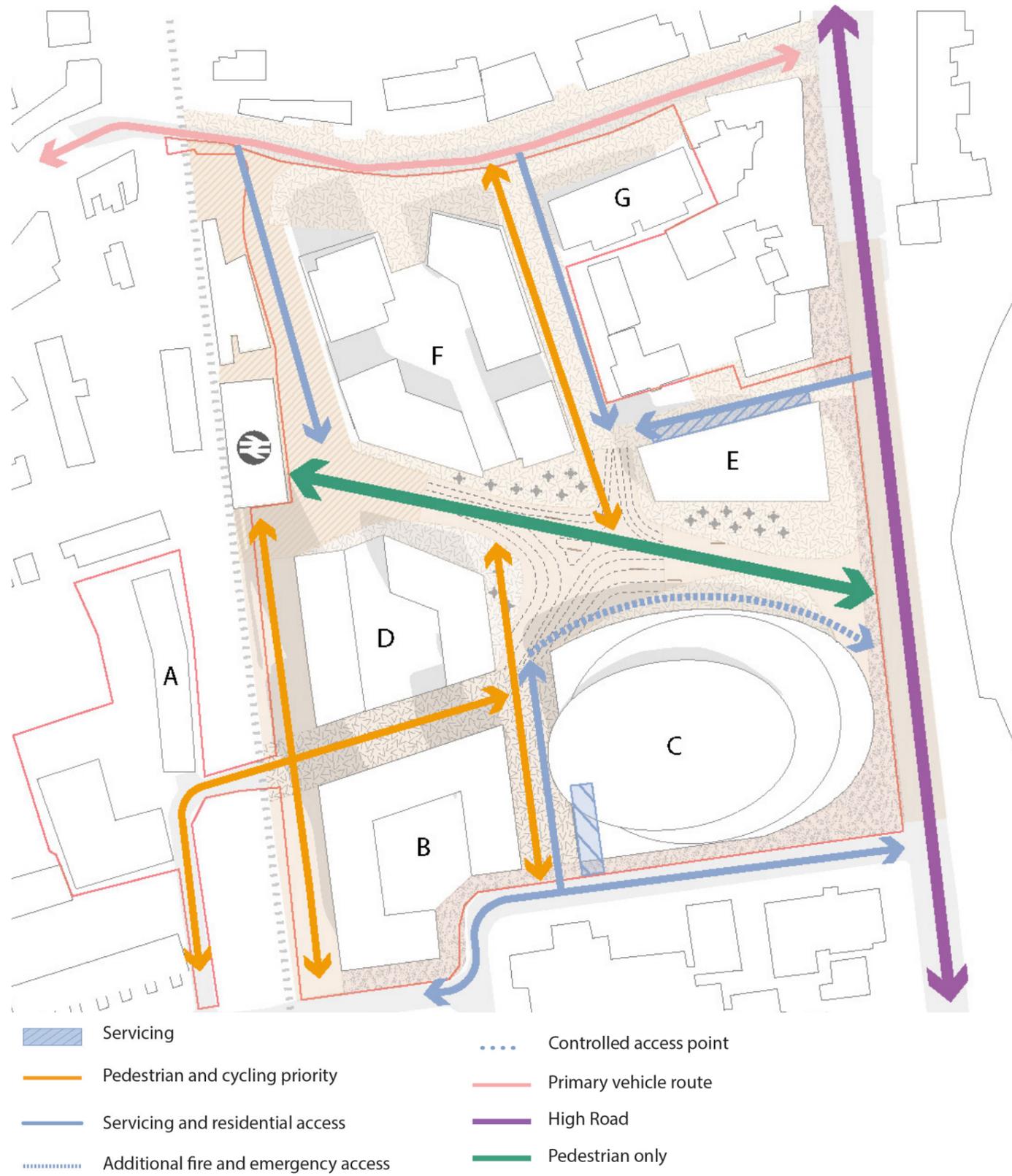


Figure 9: Alternative Masterplan Access & Movement