

Tottenham Hotspur Football Club

High Road West: Compulsory Purchase Order

Proof of Evidence

Reference: Issue 1

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Contents

1.	Introduction	1
1.1	Name, Qualifications, Experience	1
1.2	Proof of Evidence	2
1.3	Structure of Evidence	2
2.	Context	3
2.1	High Road West Masterplan Framework	3
2.2	Consultation on the HRWMF	5
3.	Alternative Masterplan alignment with the Vision	8
3.1	Approach	7
3.2	Layout and Land Use	8
3.3	Placemaking and Phasing	13
4.	Conclusion	15

Figures

Figure 1: Alternative Masterplan view from White Hart Lane Station through Moselle Square	9
Figure 2: Daytime render of Tottenham Hyper Theatre	10
Figure 3: Extract from Alternative Masterplan for CPO scheme area	11
Figure 4: Indicative Phasing Diagram for Alternative Masterplan	15

1. Introduction

1.1 Name, Qualifications, Experience

1.1.1 I am 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 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.

1.1.2 My involvement with the High Road West Masterplan and relevance to this Inquiry is :

1.1.3 - Arup's design lead for the High Road West Masterplan Framework (HRWMF)¹ and Tottenham Physical Regeneration Framework in 2012-2013. This work was commissioned by Haringey Council and the Greater London Authority following the 2011 riots.

1.1.4 - Arup design lead for the update to the HRWMF to align it with the emerging Tottenham Area Action Plan for Haringey Council. The work was completed in September 2014, following a period of consultation between February and July 2014. The Tottenham Area Action Plan (TAAP)² Development Plan Document (DPD) was adopted on 24th July 2017.

1.1.5 - My current role Arup's design director for the alternative Masterplan approach for Tottenham Hotspur Football & Athletic Co. Limited (the Appellant). Since 2019 Arup have been working with the Club to prepare an Alternative Masterplan and Approach for the High Road West Masterplan Framework and wider North Tottenham Regeneration Area. The purpose of the Alternative Masterplan is to demonstrate how the ambition and objectives of the TAAP can be delivered as a holistic, integrated vision that delivers wider benefits for North Tottenham.

In August 2022, a hybrid planning permission was granted for High Road West (ref. HGY/2021/3175)³

1.1.6 . This application was submitted by Lendlease. The permission grants 'Outline' permission for the entire site and 'Detailed' permission for development at Whitehall Mews. This is referred to as the Permitted Scheme (PS) in this proof. The Compulsory Purchase Order (CPO) applies to the southern half of the Permitted Scheme south of White Hart Lane and is referred to as the

¹ Core Document 3.6

² Core Document 3.5

³ Core Document 4.28

CPO Scheme in this proof.

1.2 Proof of Evidence

- 1.2.1 The evidence which I have prepared and provide in this proof is true to the best of my knowledge. In submitting this proof, I confirm that I have stayed with my professional requirements as set out in the RIBA Code of Professional Conduct and the Arup Code of Ethics requiring me to act at all times with integrity and avoid any action or situations which are inconsistent with their professional obligations.
- 1.3 I have been instructed by Canvax Limited, Goodsynd Tottenham Limited, Meldene Limited, Tottenham Hotspur Stadium Limited, Paxton17 Limited, Stardare Limited and High Road West (Tottenham) Limited – together referred to as Tottenham Hotspur Football Club (“THFC”) for the purpose of this proof of evidence.
 - 1.3.1 My evidence considers issues on land use, placemaking and phasing.
 - 1.3.2 It sets out the vision of the adopted High Road West Masterplan Framework (HRWMF), the Tottenham Area Action Plan (TAAP) and alignment of the Alternative Masterplan with these principles.
 - 1.3.3 It evidences how the Alternative Masterplan delivers the vision and objectives of the HRWMF and fulfils the requirements of the TAAP. It makes a case for an alternative to the CPO Scheme by creating a mixed-use leisure-based destination around Moselle Square.

2. Context

2.1 High Road West Masterplan Framework

2.1.1 The 2011 London riots resolved Central Government and the Greater London Authority to inject fresh political energy to address systemic failure in Tottenham. Working with Haringey Council they set up an independent commission who published their findings and recommendations in the 2012 report ‘It Took Another Riot’⁴. As stated in the introduction (p23):

2.1.2 “....we can see how the corrosive combination of unemployment, poor skills, lack of civic facilities, overcrowded housing and inadequate policing can all contrive to worsen the situation and reduce individuals’ prospects and quality of life for all. Society must not abandon Tottenham or its youth.”

2.1.3 The report identified 8 key challenges facing Tottenham:

1. Public Image – poor reputation and negative image fails the area, affecting inward investment, visitor levels and job prospects.
2. Population churn – high population churn damages the urban environment, education, healthcare, housing, community identity and can create crime.
3. Built Environment – the physical landscape is fraught with faded industry, coupled with poor planning which created large-scale social housing projects. Some areas are poorly managed with a lack of planning enforcement.
4. Unemployment, Enterprise & Investment – a lack of jobs, particularly for local people.
5. ‘Troubled families’ – an estimated 900-1,200 families with interconnected, complex needs.
6. Youth engagement
7. Police relationships – fear of crime is both a cause and a consequence of Tottenham’s problems. Community relations with the police are poor.
8. Healthcare – over-crowding, cultural diversity and the low socio-economic status results in a complex health context.

⁴ Core Document 5.13

- 2.1.4 The report recognises Tottenham Hotspur's presence in the locality and the potential this has to act as a catalyst for change, stating:
- 2.1.5 *"We applaud Tottenham Hotspur FC's decision to stay in the area. The football club gives Tottenham global recognition, and the decision to redevelop White Hart Lane is a strong sign of confidence in the area. It carries significant regeneration potential with the promise of new housing and **retail units that bring jobs**, as well as the **opportunity to serve as a catalyst for wider change in the area**. Public realm improvements, estate renewal and a new railway station are all critical to capture the benefit of this investment. We look forward to a new vision for developments around the approved stadium, incorporating high quality architecture, greater density, and more retail units adjoining the new Sainsbury's supermarket site, **providing even more local jobs...**" (Pg. 83, emphasis added)*
- 2.1.6 The report goes on to make Eight Challenge Specific Recommendations (p40) linked to public image, reducing population churn, improving housing standards and quality and safety of public spaces, creating jobs and engaging with young people.
- 2.1.7 The 2012 brief for the High Road West Masterplan Framework (HRWMF) was developed in this post-riot context, taking into account the findings of the report. The vision for the HRWMF was to create a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London. Key objectives include:
- Creating a vibrant mixed use, leisure led destination; creating a place to dwell and offering the community and visitors a range of civic and leisure amenities to improve image and create destination.
 - Addressing issues of safety and security and improving the quality of public open space; increasing active frontages and passive surveillance of the main public spaces and creating different spaces for residents and visitors;
 - An increase in the number of homes, range of housing typologies and mix of tenures, including a policy compliant level of affordable housing; to meet housing needs, increase housing supply and improve housing quality.

2.2 Consultation on the HRWMF

2.2.1 Consultation with the local community in North Tottenham played an integral part of the development of the HRWMF. Consultation was undertaken by the LB Haringey between 2011-2014, specifically in White Hart Lane and Northumberland Park wards, which are the ones directly affected by the HRWMF proposals. A summary of the consultation follows:

1. Ward Consultation (2011)
2. Homes for Haringey Resident Consultation (Spring 2012)
3. Residents Meetings (July 2012)
4. Design Workshop (July 2012)
5. Tottenham Ted Talk (September-December 2012)
6. High Road West Options Consultation (April-June 2013)
7. Tottenham's Future Consultation (October 2013- March 2014)
8. Masterplan Consultation Events (February- July 2014)

2.2.2 Between 13 September 2014 and 25 October 2014, residents were surveyed on their opinions on key themes within the Masterplan, including overall design, housing, businesses, open spaces, community benefits, transport, and the proposed idea for redeveloping White Hart Lane Station.

2.2.3 Of the 292 feedback forms, the following results emerged:

- 79% of respondents supported the principle – *‘There should be a community hub (with library, learning, community and business space) and this should be built on the High Road and in the new public square, Moselle Square, so that it is accessible for all’*.⁵
- 70% of respondents ‘strongly agreed’ or ‘agreed’ that *‘New leisure, food and retail businesses should be located around the new public square (between the new White Hart Lane station and the High Road) to help create the new sports and leisure destination’*

⁵ https://www.haringey.gov.uk/sites/haringeygovuk/files/2014_high_road_west_consultation_feedback_report_2014_pdf_21mb.pdf

2.2.4 A full consultation report was published, which contains further evidence of the extent of public consultation which informed the HRWMF⁶. In summary, in the wake of the 2011 riots in Tottenham, there was a recognition and renewed political desire for change in the area to address systemic issues. It is within this context that the HRWMF was established, based on an extensive public consultation.

2.3 Adoption of the North Tottenham Area Action Plan

2.3.1 In July 2014, The Tottenham Area Action Plan (TAAP) Development Plan Document (DPD) was adopted. The DPD puts clear planning guidelines and policies in place to support local people's ambitions for long-term regeneration in Tottenham, bringing thousands of new homes, better access to jobs and employment and improved transport links.

2.3.2 The HRWMF was adopted later, in September 2014, and provides guidance for future planning applications within the High Road West area based on Site Allocation NT5 in the TAAP.

2.3.3 The main role of the HRWMF is to establish 'Key Principles' to guide future development proposals and assist in promoting sustainable balanced communities to meet social, physical and economic regeneration objectives. It translates the Council's and local communities' aspirations for the area into an overarching vision and sets out key principles regarding the land use, phasing, quantum of development, massing and heights of buildings within the site.

2.3.4 The established vision for the area is:

1. A well-connected place creating neighbourhoods which are accessible by all forms of transport with attractive walkable streets including new north-south and east-west links
2. A safe and welcoming neighbourhood with active street frontages and attractive open space.
3. A significant increase in the provision of community facilities and the local community will have the best possible access to services, infrastructure and public transport to wider London.
4. A balanced place to live and work. The HRWMF provides a mix of homes. There will be high quality new workspaces and new job opportunities for the local community.
5. A cohesive community which promotes social interaction with new public open spaces for the community to foster community cohesion and social inclusion.

2.3.5 The Alternative Masterplan fully aligns with the Council's vision for High Road West and these key principles, set out in the HRWMF.

⁶ https://www.haringey.gov.uk/sites/haringeygovuk/files/2014_high_road_west_consultation_feedback_report_2014_pdf_21mb.pdf.

3. Alternative Masterplan alignment with the Vision

3.1 Approach

- 3.1.1 This section reviews the Alternative Masterplan proposals against the requirements of the TAAP and the vision and key principles of the HRWMF . It makes a case for an alternative to the CPO Scheme by creating a mixed-use leisure-based destination around Moselle Square.

3.2 Layout and Land Use

- 3.2.1 The Alternative Masterplan creates a landmark mixed-use leisure led destination south of White Hart Lane including a multi-functional cultural venue. The multi-functional cultural venue is a flexible venue for the performing arts and is positioned on a key route between White Hart Lane station and the High Road. This is in full alignment with the vision of the TAAP and the HRWMF.
- 3.2.2 The TAAP (page 1) envisages: *“The reconstruction of Tottenham Hotspur’s football stadium and complementary development on High Road West and Northumberland Park, will provide a **new leisure destination** for north London within the borough alongside much needed new jobs, retail space, services and homes for local residents”* (emphasis added).
- 3.2.3 Paragraph 2.37 of the TAAP further reiterates the desire to create a leisure led destination, stating: *“In North Tottenham, there is a need to realise the investment being made by Tottenham Hotspur FC on their stadium site as a catalyst for wider change, ensuring this area becomes a hub of activity throughout the week and not just on match days. This can be achieved by establishing the location as a premier leisure destination for London whilst also retaining and enhancing a more local retail function to support the community”*.
- 3.2.4 The TAAP sets out why this is necessary (para 3.23): *“The priority is to ensure that, even on non-match days, the area is lively and attracts people to make the most of the stadium development, the High Road, and wider urban realm improvements that will take place as part of this development. Provision is therefore proposed for new community facilities and leisure orientated retail development to further cement the area’s reputation as a premier leisure destination within North London.”*

- 3.2.5 The site requirements of the TAAP require development (p. 104) to: *“Enhance the area as a destination through the creation of new leisure, sports and cultural uses that provide seven day a week activity.”*
- 3.2.6 The HRWMF fed into the TAAP and sets out that the vision *“for High Road West is to create a vibrant, attractive and sustainable neighbourhood and a new sports and leisure destination for North London.”* (p.87).
- 3.2.7 The HRWMF defines Moselle Square as the heart of High Road West, setting out that *“This spacious, high quality outdoor space will be the focus of community, cultural and leisure activities”*. The vision is that *“People will want to visit Moselle Square and High Road West because of its sport and leisure offer, which will build on the international sports identity established by Tottenham Hotspur Football Club and the provision of new facilities such as a cinema, fitness centre, bars and restaurants.”* (p. 88).
- 3.2.8 The Alternative Masterplan fulfils these ambitions: the heart of HRW South becomes a dynamic and vibrant destination for locals and visitors, home to a rich blend of local and international creative expression of art, culture and education, performing arts, visual arts, architecture and design, craft and making and leisure. The key move in achieving this is the inclusion of education spaces and multi-functional cultural venue surrounding Moselle Square.
- 3.2.9 This will include a multifunctional culture and education space of c. 3,500 sqm, spread across ground floor and first floor and outdoor event space opening out into Moselle Square.



Figure 1: Alternative Masterplan view from White Hart Lane Station through Moselle Square

- 3.2.10 The multi-functional venue will provide a multifunctional flexible venue for the performing arts, with approximately 16,000 sqm over multiple floors, with a glazed lobby towards Moselle Square and the High Road and active frontages towards Church Road, accessible and green roof terraces and a transparent skin that lights up at night. It will be a uniquely flexible venue for culture which will allow for intimate theatre and larger events. It will be of a bold design combined with cutting edge technology to make unforgettable and everchanging experiences. .



Figure 2: Daytime render of Tottenham Multi Functional Venue

- 3.2.11 This mix of complementary uses on Moselle Square will create a vibrant destination based around the landmark leisure offer. The generosity of space proposed in Moselle Square provides opportunity for greater animation and activity as a destination.
- 3.2.12 Moselle Square has an enhanced configuration of public realm in terms of size, quality, greening, connectivity and accessibility and diversity of use, both on event days and normal days.
- 3.2.13 With regard to residential uses, the HRWMF defines residential development as being focused predominantly north of White Hart Lane (p.110), with around 1,200 homes within this part of

the site allocation. The Alternative Masterplan fulfils this vision by siting residential uses to the north of White Hart Lane. The inclusion of the vibrant mixed-use leisure destination and increased leisure, retail and commercial space to the south of White Hart Lane, along with the provision of new homes, best fulfils ambitions for the area.

3.2.14 Overall, the Alternative Masterplan would deliver over triple the amount of commercial/leisure/retail floorspace (GEA) than the Permitted Scheme maximum parameters scheme and still exceed the number of homes expected under the HRWMF. In terms of layout, the Alternative Masterplan, see Figure 3, broadly follows the approved plot and block structure of the Permitted Scheme but introduces these alternative uses and revised parameters for the scale and layout of buildings and uses for plots C, D and E. The alignment of building Plots D and E are also adjusted with the inclusion of new education space in Plot E. The Library in Plot E of the Permitted Scheme would be relocated to the Grange on White Hart Lane.



Figure 3 Extract from Alternative Masterplan showing the CPO scheme area

- 3.2.15 The purpose of the changes is to reflect the leisure and cultural objectives of the TAAP.
- 3.2.16 The ground floor uses proposed by the Alternative Masterplan deliver an improved relationship with public realm due to more and diverse active façade uses in plots C, D, E and F. Plot C north, east and south-eastern façade has retail, food and beverage and workspaces at ground floor, which is a significant increase to the proposed active frontage in the CPO Scheme. Plot E has more retail, education and residential uses, compared to the CPO Scheme. Plots F and D have a blend of retail, workspaces and residential entrances compared to single use retail facades in the CPO Scheme.
- 3.2.17 The revised configuration of Plots C, D and E provide a wider and more legible connection between White Hart Lane Station and the Stadium. The size of Moselle Square would increase by an additional 850 square metres, compared to the CPO Scheme.
- 3.2.18 The Alternative Masterplan would deliver improved spatial conditions that deliver more safety, security, and biodiversity, compared to the CPO Scheme, which consist of:
1. Clear hierarchy and function
 2. Specific crowd management spaces
 3. Raised table section of the High Road and enhanced set-back
 4. Pedestrian priority residential streets
 5. Dedicated logistic space
- 3.2.19 Overall, the proposed mix of uses and layout would successfully deliver on the TAAP and HRWMF's vision to create a premier leisure destination for North Tottenham.

3.3 Placemaking and Phasing

- 3.3.1 The HRWMF sets clear principles for the phasing of development – with the requirement to minimise disruption, allow communities to move together to keep support networks intact and for Love Lane residents to only move once.
- 3.3.2 The Alternative Masterplan is proposed to be delivered comprehensively and to achieve these goals, with three significant improvements compared to the Permitted Scheme, see Figure 4.
1. Single phase decanting
 2. Early rehousing of all residents
 3. Early delivery of the entire Moselle Square
- 3.3.3 The decant strategy of Love Lane Estate residents involves one single phase of rehousing of all residents into the Whitehall Mews (Phase 1a) west of the railway viaduct and Depot Site (Phase 1a) north of White Hart Lane. This would avoid a lengthy, non-consecutive decant process and enable the existing residents to be relocated as one community.
- 3.3.4 Secondly, this decant would occur one phase earlier than in the Permitted Scheme, which will avoid the Love Lane Estate residents living amongst noise and disruption caused by enabling, demolition and building works for blocks D and F.
- 3.3.5 Thirdly, single phase decanting and demolition of Love Lane estate will allow Moselle Square to be delivered in early stage of development (Phase 2a) and in its entirety, ensuring a continuous public realm between station and stadium, minimising disruptions of surrounding community on event days due to temporary measures. The early delivery of Moselle Square will result in the early creation of a vibrant landmark destination and meet the expectations of the HRWMF.



- **Phase 1**
 1a Start early 2024, complete mid 2026
 1b Start early 2024, complete late 2025
- **Phase 2**
 2a Start mid 2026, complete early 2028
 2b Start mid 2026, complete late 2029
- **Phase 3**
 Start early 2030, complete late 2033
- **Phase 4**
 Start early 2032, complete mid 2035
- **Phase 5**
 Start mid 2034, complete mid 2037

Figure 4 Indicative Phasing Plan for Alternative Masterplan in CPO area

4. Conclusion

- 4.1.1 Twelve years ago, Tottenham was facing the aftermath of major rioting. There was no single cause; the riots were the culmination of interwoven challenges relating to housing, health, education, aspiration, crime, the public realm, the area's reputation, business and employment levels. It was recognised that simultaneous, coordinated, and multi-agency responses were required to forge positive change in Tottenham.
- 4.1.2 The High Road West Masterplan Framework (HRWMF) was conceived in the wake of the riots. It was created with the local community through an extensive process of engagement spanning over 3 years. The extent of engagement was crucial to ensuring that the local community are at the heart of regeneration proposals in the area.
- 4.1.3 The HRWMF was adopted in the Area Action Plan establishing the ambition for a **premier leisure destination** for London whilst also retaining and enhancing a more local retail function to support the community. This is a key part of the vision; providing local benefits and jobs, but also enhancing investment and improving the reputation of the area.
- 4.1.4 The Alternative Masterplan boldly matches this vision and the policy requirements; it looks to create a fundamental shift in the nature of the area to address systemic failures of *“neglected people, of poor opportunities for employment, and of difficult social conditions, where poverty and poor accommodation lower life quality and expectancy”* (pg. 30, 'It Took Another Riot').
- 4.1.5 In particular, the Alternative Masterplan includes a multi-functional cultural venue and complementary uses in Moselle Square, establishing the area as a **premier leisure destination** for London and demonstrating that wider socio economic benefits could be delivered for North Tottenham than proposed by the CPO scheme.