

MARY POWELL (OBJECTION 11) – REPONSE TO NATIONAL PLANNING POLICY FRAMEWORK 2023

1. The NPPF document was published in December 2023 and circulated to parties in the High Road West CPO Public Inquiry on 22 December 2023, for comment by 5 January 2024. I have opted to respond despite the short timescale over bank holidays. I shall draw out points in the High Road West proposal below which are relevant to the recommendations in the updated document.

Education and Healthcare provision for a sustainable community

2. Developments should guard against the loss of valued local facilities or businesses (NPPF paragraph 97). The High Road West Consented Scheme will lead to the premature demolition of a Health Centre and Library as well as established local businesses, long before any sort of replacement (which may be inferior) can be put in place.
3. The Consented Scheme, and the wider High Road West “regeneration” area will replace an existing council housing estate of 297 dwellings with a development of up to 3000 dwellings if the area to the north of White Hart Lane is also taken into account. This may appear to be a more efficient use of the available land to increase housing. However, this will not include any additional healthcare or school facilities as required by the NPPF (paragraphs 99-100).
4. The existing Health Centre will be demolished early in the Consented Scheme (as part of the CPO under discussion here) and will eventually be replaced like-for-like in the new development, but there will be no additional Health Centre to support the increased population of the area.
5. No new school will be provided despite the huge growth in the number of dwellings. The educational facility which will eventually be built within the Consented Scheme is a “learning centre” to replace the existing Library, which is due to be demolished in this first phase too.
6. Between the demolition of existing facilities and the construction of the new facilities there will be less such provision in the area. Eventually there will be something approaching a like-for-like replacement of the Health Centre and Library in an area with ten times as many dwellings.

Sustainable Transport (NPPF paragraphs 108-110)

7. The Consented Scheme and wider High Road West “regeneration” will eventually lead to a tenfold increase in dwellings as well as additional retail, office and leisure facilities. No new public transport infrastructure is planned. At least at the nearby Meridian Water scheme a railway station was repositioned from Angel Road. For High Road West there is nothing new on offer. White Hart Lane Station has already been remodelled by TFL to make it more accessible, so the “regeneration” benefits from this earlier work but adds nothing to it. Nor are any new bus routes proposed, and the long-anticipated extension of the Victoria Line to Northumberland Park has never happened. Northumberland Park Station¹ is an under-used resource, and could be better utilised, rather than serving as little more than match day overspill.

¹ Haringey Community Press 29 December 2023 (<https://haringeycommunitypress.co.uk/2023/12/29/busiest-railway-stations-in-haringey-borough-revealed/>).

8. The “regeneration” was an opportunity to improve cycle infrastructure, and Haringey Council has claimed it will do so. However, one designated cycle route proposed for the Consented Scheme does little more than re-provision the existing North-South route of Love Lane which is already a quiet route for cyclists (CD11.37 page 3). The scheme does nothing to improve the hostile environment for cyclists on the High Road or White Hart Lane. It also does not acknowledge the existing proximity to Cycle Superhighway 1 along Church Road to the immediate south of the Consented Scheme. In order to be innovative, the scheme could have included significant traffic calming features in the surrounding main roads, so that segregated and meandering cycle routes would be unnecessary. When cyclists are treated as an integral part of the traffic and not something to be separated from the rest of the traffic, the roads can become safer for everyone. The High Road West scheme shows no such imaginative thinking.

Sustainable Communities

9. The overall “regeneration”, including lands to the north of the Consented Scheme will require the demolition of existing established businesses. In the Consented Scheme this includes family businesses facing the High Road, which have been a part of the fabric of this community for decades. Those businesses are going to be displaced for several years, from their freehold properties, possibly coming back to leasehold business premises after several years away.
10. This will furthermore destroy an existing “town centre” on the High Road, to be replaced eventually by businesses primarily serving the matchday and nighttime economies rather than any local community need. (NPPF paragraph 90).
11. A light industrial estate (Peacock Estate) is also due to be demolished to the north of White Hart Lane in the next phase of the “regeneration”. The Consented Scheme and the land to the north of White Hart Lane will eventually include business premises for retail and leisure purposes, but real jobs on an industrial estate replaced with ephemeral “McJobs” and the gig economy.

Housing Supply

12. A clear priority in the national planning policy (paragraph 64) is the provision of sufficient housing and in particular sufficient affordable housing. Haringey’s waiting list is in the order of 12,000 households. If this estate “regeneration” was primarily about meeting housing need and not council-led gentrification or the enrichment of Lendlease shareholders, the entire scheme would be based on affordable housing.
13. Planning decisions should be made with reference to agreed local planning policies. The 2021 London Plan indicates that new developments should consist of at least 50% affordable housing, particularly on public land and rising to 60% in the case of strategic partners².

² London Plan 2021 Chapter 4 <https://www.london.gov.uk/programmes-strategies/planning/london-plan/the-london-plan-2021-online/chapter-4-housing#policy-h4-delivering-affordable-housing-170905-title>

14. The Consented Scheme is expected to comprise 1488 properties. This will include 502 Social Rented dwellings and 74 Shared Ownership dwellings, totalling 576 “affordable” dwellings. That amounts to 39% of dwellings in that scheme, far short of the London Plan figure. This is despite the “regeneration” taking place on land currently owned by Haringey Council, which could insist on an improved percentage if it wanted to.
15. The land north of White Hart Lane is not expected to have any Social Rented properties. Shared Ownership, based on the indicative figures currently available might make up about 30% of the dwellings being sold to the north of White Hart Lane, as the only “affordable” option (CD 9.12).
16. The Consented Scheme appears to make no provision for retirement housing, housing with care or care home facilities. Nor is there any provision for the traveller community. These are all needs within the local area not being delivered elsewhere nearby, but they might be “too social” for the marketing image of the new Lendlease development (NPPF paragraph 63).
17. The NPPF document makes repeated reference to creating “beautiful” homes but there is nothing beautiful about the identikit apartment blocks proposed by Lendlease which will be indistinguishable from the close packed barracks and tower blocks of Tottenham Hale or Meridian Water. Urban heat islands and wind tunnels will be the inevitable results.
18. There is no provision for additional allotment space in the new development despite the borough’s existing allotments being oversubscribed. The preponderance of high-rise buildings will mean that only a tiny proportion of dwellings will have any access to private garden space (NPPF paragraph 96).

Safe and Healthy Communities

19. The proposed “regeneration” appears to contradict several requirements in this section of the updated NPPF document:
 - a. The Consented Scheme contains no meaningful public green space, other than small patches of shrubbery. A public green space is planned for the later stage of the “regeneration” north of White Hart Lane, but if it ever happens it is many years away. Without sight of the full development agreement, it is not clear if Lendlease can be held to providing this public green space at the later stages of the development or if Lendlease could walk away early. The affordable housing residents, who will move in first, will be left waiting for a public green space which might never happen. In the meantime, they would have lost the existing well used lawns between Brereton Road and Whitehall Street.
 - b. The new public green space, if it happens, will be situated in the development to the north of White Hart Lane, adjacent to the dwellings for sale (Market Sale and Shared Ownership). The residents in the Social Rented dwellings will have to leave their part of the new estate and cross a busy road to access the green space in the proposed Peacock Park. This will not be a park where the children of the Social Rented dwellings can play out unsupervised whilst overlooked from above by their parents or carers. By making it harder to access, the new

park will be unwelcoming to the residents from the Social Rented blocks, and will favour the private buyers to the north of White Hart Lane.

- c. As mentioned above the Consented Scheme will do nothing to improve existing cycle routes and will simply recreate an existing quiet route along the current Love Lane.
- d. The Consented Scheme will create more areas such as Moselle Square where large crowds can congregate and loiter, particularly on matchdays, increasing the risk of ASB and violence. This is instead of efficiently funnelling visitors to and from the stadium and getting them out of the area before they can do too much damage. A walkway along Moselle Street and Moselle Place, connecting the station to the stadium, already exists. It could be better maintained to provide a direct route to and from the stadium, but it is currently left in a poor condition by Haringey Council. The proposed public concrete grey space in Moselle Square creates a hostile environment for women and girls, particularly on match days.

Achieving Well Designed and Beautiful Places

- 20. The Consented Scheme will change the character of the area entirely, creating a sterile, high-rise environment. It will be another ugly sibling for the family of developments at Tottenham Hale and Meridian Water. Nothing will be “beautiful” (as required in the NPPF document) about it.
- 21. The Consented Scheme will not reflect the local vernacular as seen in the townhouses on the High Road which date from the 17th to 19th Centuries. (NPPF paragraph 135). To say that the Love Lane Estate does not reflect this vernacular either, is no excuse for creating something worse, far higher rise and more densely packed.
- 22. The early demolition and replacement of the five newer blocks on the south side of Whitehall Street is what I have objected to in particular. It was presented at the hearing as allowing the creation of a “transition” between the high-rise new development and the area of council housing to the south of the Consented Scheme (in the verbal evidence of Lucas Lawrence). In reality, this means that the housing in new blocks A-C will be a buffer zone or cordon sanitaire between the market sale properties and the remaining council housing of the area. The private buyers will be protected from having to look at the council housing in the surrounding streets or mix with its inhabitants, even though the development they live in will have a much greater negative impact on the visual appearance of the area.

The Challenge of Climate Change

- 23. The Consented Scheme does nothing to mitigate the impacts of climate change but will rather create flood risks, urban heat islands and a series of wind tunnels. An increase in hard surfaces and reduction in green spaces will lead to losses of natural drainage in the Consented Scheme (NPPF paragraph 158).
- 24. The NPPF document sets out the need for renewable and low carbon energy sources but does not specify a district heat network, as proposed for the Consented Scheme. There is reference

to other measures such as heat pumps or solar panels (including retrofitting) which might still give residents a greater sense of control and choice whilst reducing the carbon footprint. The proposed heat network in the Consented Scheme will trap residents with one provider and exclude the beneficial impact of market forces on efficiency or service standards (NPPF paragraphs 160-164).

25. The demolition of the existing estate, rather than retrofitting for increased energy efficiency (and general good maintenance), creates a massive carbon cost. The estate was built between the 1950s and 1970s and its buildings should have many more years of productive life if managed by a competent landlord.
26. Flood risk is addressed at NPPF paragraphs 160-165. The Consented Scheme is within a level 2 flood risk area (see annexed Environment Agency flood map). The proposed new scheme will increase the buildings' footprint and will mostly consist of hard surfaces in the communal spaces, thus increasing the flood risk and reducing any natural drainage. This is especially true of the Consented Scheme south of White Hart Lane (see diagram at CD11.37 page 3). The culverted Moselle River runs along the eastern and northern side of the Consented Scheme. With increasingly volatile weather events, due to climate change, the overdevelopment above this enclosed river presents a hidden but significant flooding risk.
27. No additional Thames Water infrastructure has been indicated. Greater pressure on the existing sewage and waste water system, feeding into culverted watercourses, will increase both flooding and contamination risks. A new estate, eventually with 10 times as many dwellings as the existing estate, will present Thames Water with more opportunities to claim that raw sewage needs to be pumped into surrounding waterways due to "exceptional" pressure on their systems. This will damage further the already heavily polluted River Lea, its tributaries like the Moselle and the Lee Navigation. Either that or sewage backing up into homes.
28. A high-density development increases flood risk generally and reduces the potential for flooding events to be mitigated via SUDS or natural flood management. This is likely to have a knock-on effect for the flood risk to surrounding areas such as Northumberland Park and Bruce Grove.

Conclusion

29. In short, the proposed scheme which requires a CPO to be confirmed to go ahead in its current form, breaches the National Planning Policy Framework in multiple ways, particularly in terms of education and healthcare provision, sustainable transport, sustainable communities, housing supply priorities, creating safe and healthy communities, good design and mitigation against climate change.
30. The CPO should not be confirmed, so as to prevent the above breaches of national planning policy.



Flood map for planning

Your reference	Location (easting/northing)	Created
<Unspecified>	533788/191260	30 Dec 2023 13:21

Your selected location is in flood zone 2, an area with a medium probability of flooding.

This means:

- you must complete a flood risk assessment for development in this area
- you should follow the Environment Agency's standing advice for carrying out a flood risk assessment (see www.gov.uk/guidance/flood-risk-assessment-standing-advice)

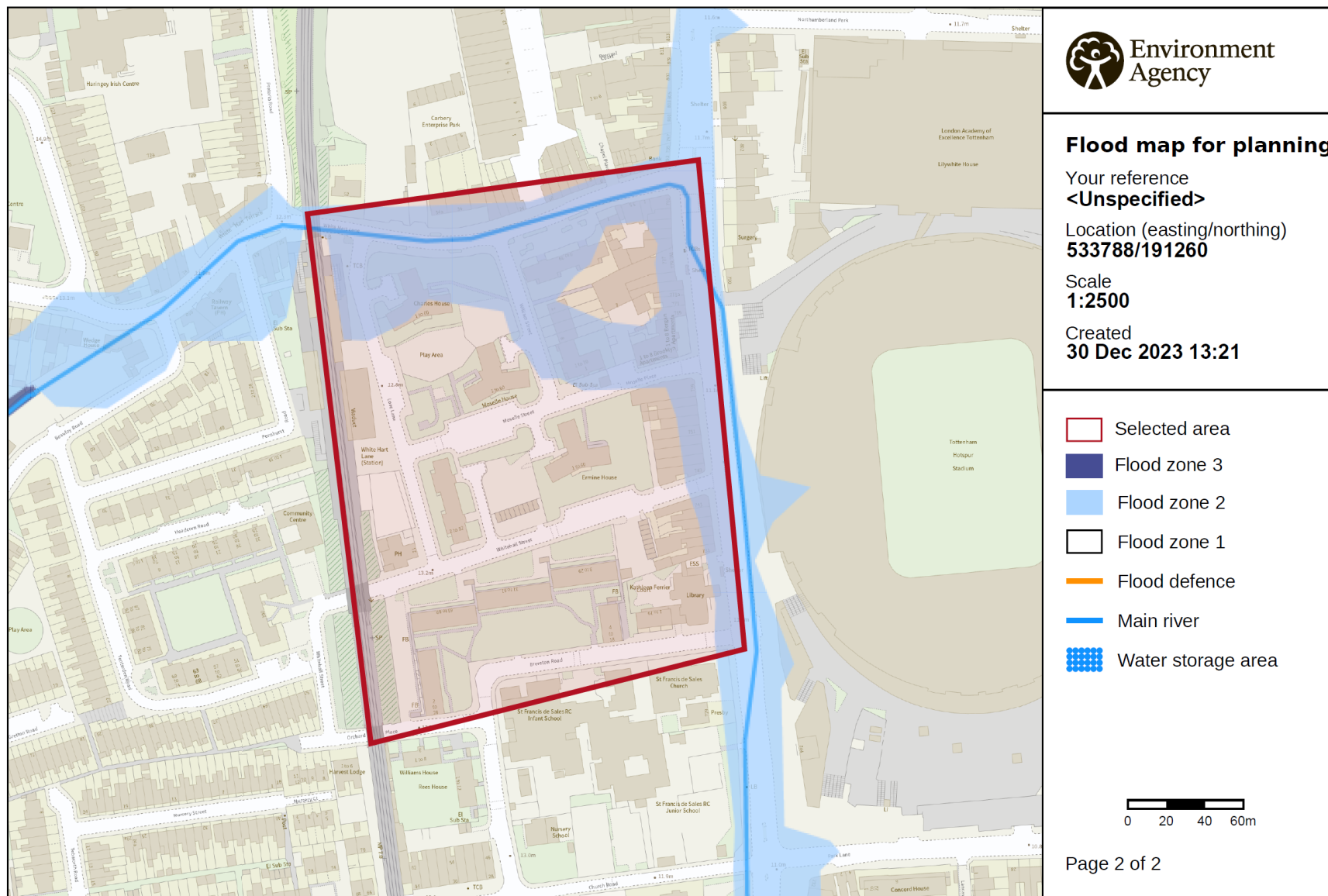
Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

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