

# DHRA Policy Statement on 500 White Hart Lane N17 7NA

28 June 2016

Devonshire Hill Residents Association, London



The Green, Devonshire Hill Lane. The courtyard as it appears today.



The Green, Devonshire Hill Lane. Estimated impact of 500 WHL proposal, based on publicly available data.



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We, the residents of the Devonshire Hill area of north Haringey, London, and members of the Devonshire Hill Residents Association (DHRA), stand in opposition to the proposal outlined in Haringey planning application HGY/2016/0828, and wish to file an objection.

This proposal, from the Tottenham Hotspur Football and Athletic Co Ltd, asks to build a group of tall tower blocks on the site of 500 White Hart Lane, N17 7NA. On the surface this sounds intriguing, given the demands on London's housing. But further examination reveals significant and fundamental flaws in the proposal.

Indeed the June 2016 planning forum was attended by over 70 members of the public, all of whom unanimously rejected this proposal as unsuitable for the area.



## Policy statement introduction

**Devonshire Hill is not a struggling and deprived urban area in need of high-density bulldozer regeneration. It's a healthy, friendly suburb of two storey houses, mostly owned by their occupiers, in need of investment in local amenities and services. These are utterly different and incompatible cases.**

**Tottenham Hotspurs bought 500 White Hart Lane to relocate Archway Metals. When that no longer became necessary the company devised a plan to maximise the return on their minimal investment on the land.**



**Developers have the right to turn a fair profit on a project. They do not have the right to demand that exceptions must be made to Council policies simply to increase short-term profits, especially at the direct and long-term cost to the Council and to the community.**

**In short, development must solve problems, not create new ones.**

*Photo: Devonshire Hill Lane, the street directly north of the proposed project.*

## **Executive summary**

DHRA opposition to this proposal is based on the following specific and material grounds:

### **1. Proposal depends on a miscategorisation of the region**

The neighbourhood is suburban, consisting of 2 storey terraces and semis. The proposal is suited for a high-density urban area, not a suburb.

### **2. Height is inappropriate, excessive, and overbearing**

A group of towers, reaching 6 storeys in height, is not appropriate for the area. It's overbearing, and will sit oppressively next to neighbouring 2-storey houses.

### **3. Overlooking and loss of privacy**

The buildings will inflict a loss of privacy on neighbouring houses owing to scale and height.

### **4. Excessive density**

144 flats on a small plot of land suitable for perhaps 2 dozen houses is excessive density for the area, particularly given poor transport (point 9) and lack of basic services (point 10).

### **5. Dangerous precedent for loss of protected employment land**

The land is currently designated for employment use – a Locally Significant Industrial Site – per Haringey's Local Plan. This protection would need to be exempted, likely causing a domino effect, resulting in eventual and complete loss of employment land in the area.

### **6. Poor arguments for removing LSIS protection**

The developer claims that the land does not suit employment needs. Yet considerable evidence to the contrary exists, since adjacent businesses are flourishing.

### **7. Poor site condition does not justify LSIS removal**

The developers claim that since the site is in poor condition, it should be turned residential. However, the site condition is due entirely to the choice of the developer to abandon it.

### **8. Commercial use claim**

The proposal includes some limited commercial space, to support the claim that employment will continue on-site. However, as designed it appears incomplete and unsustainable.

### **9. Poor transport links**

The site is in a transport black hole. It is far from any station or transport hub, making it utterly unsuitable for a high-density development. Most neighbouring residents rely on private vehicles, yet inadequate on-site parking is provided. (see point 12)

### **10. Poor essential services/amenities**

The area has few essential services – doctors' surgeries, shops, cafes, etc. Combined with poor transport, this makes the site unsuitable for high density development.

### **11. Local school and playground capacity is limited**

Local schools are distant and oversubscribed. The nearest playground is in Enfield. There are insufficient facilities for children and youth.

### **12. Insufficient on-site parking**

A mere 75 spots are provided for 144 flats; possibly fewer spaces when retail parking is taken into account. With such limited parking, spillover will hit already overcrowded local streets. Again, this proposal is not suited to an area with poor transport.

### 13. Deletion of existing parking

The proposal includes hidden provisions to take 2-3 existing street parking spots away from neighbouring houses, by narrowing White Hart Lane.

### 14. Decreased integration with the public realm

The developer claimed in an earlier version of the proposal that antisocial behaviour would be reduced by tying the public footpath that joins White Hart Lane to Devonshire Hill Lane into the estate. Revised plans call for half the path to adjoin a parking lot.

In short, the proposal would inflict significant long-term costs; financial and social.

It would cost Haringey Council, in terms of the struggle to provide adequate services. It would negatively affect both the existing community, and likely future residents of the complex.

At this time, the Devonshire Hill region does not represent an expensive “problem area” for the Council. If an overly dense housing project is parachuted into this area, with its poor transport links and limited essential services and amenities, then this situation will likely change.

## Detailed analysis

We would like to provide a more detailed examination of the points raised above.

### 1. Proposal depends on a miscategorisation of the region

The developers’ reports consistently describe the neighbourhood as “urban.” This is factually incorrect, as per the London Plan.

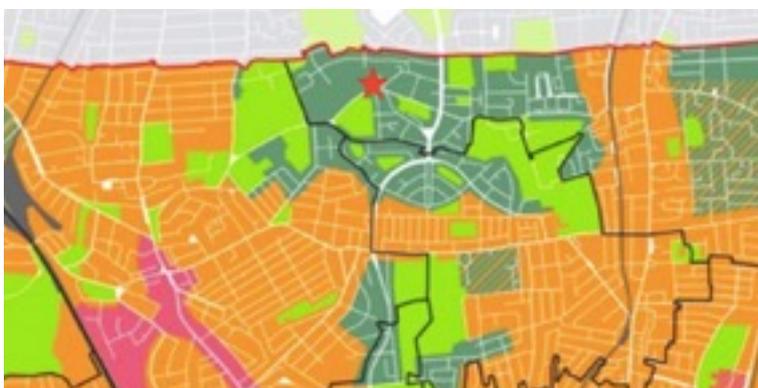
Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes.

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

– London Plan, Policy 3.4

This is not a matter of grammar or semantics. The accuracy of the definition is essential to the *very core* of the proposal, which claims that the development’s inevitable negative impacts are acceptable, on the grounds that the area is “urban.”

Since the Devonshire Hill neighbourhood is actually a quiet suburb close to, and akin to, south Enfield, the DHRA believes that the proposal must be considered and evaluated using the correct categorisation for the area.



*The areas marked in dark green are “suburban,” as shown in Haringey’s Urban Character Study, February 2015, page 240. 500 WHL is indicated by the star.*

The photos below show Devonshire Hill Lane, a typical road in the area that will be heavily affected by the proposed development. As can be seen, it's a calm, leafy neighbourhood of two-storey houses and terraces. (semis to the north are in Enfield) This is textbook suburbia, not urban blight.



## 2. Height is inappropriate, excessive, and overbearing

The proposed height for the tower complex is overbearing and unacceptable. 6 storey blocks exceed Haringey's 4-storey absolute maximum recommendations for the site (per Haringey's Site Allocations DPD Reg 18 Consultation Document, page 67). The entire surrounding neighbourhood features 2 storey houses, as shown in the photos above. Haringey's Local Plan states:

"The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings."

"Elsewhere tall buildings are considered inappropriate to Haringey's predominantly 2-3 storey residential suburban character..."

– Haringey Local Plan 6.1.1.8, page 112.

We refer to the London Plan definition of "tall and large," published in policy 7.7. Italics are ours.

"Tall and large buildings are those that are substantially taller than their surroundings, cause a significant change to the skyline or are larger than the threshold sizes (*nb: 30m outside the City*) set for the referral of planning applications to the Mayor."

500 WHL clearly matches the first two criteria. The statement uses the conjunction "or", indicating that any one or more of the three criteria will meet the definition.

### 3. Overlooking and loss of privacy

The tower complex would overlook many nearby residences. These blocks would loom oppressively over the houses and back gardens of The Green and Devonshire Gardens, eliminating residents' privacy.

The 5 storey towers at the northern end, facing The Green and Devonshire Hill Lane, are especially troubling because of the site's upwards slope, which the developers aim to preserve. The proximity to residential two-storey houses would have a massive negative effect, setting a terrible precedent for inappropriate development in the future. Indeed, Haringey's own Site Allocations DPD (Reg 18) stipulates that the area which interfaces with "residential uses" should be 3 storeys or lower.



The Green, Devonshire Hill Lane. How it looks today.



The Green, Devonshire Hill Lane. Estimated elevations of 500 WHL proposal.

Please see the rendering above. Since the developers have only chosen to publish renderings from selected angles we have had to construct this view based on available 2D data. It is therefore a best estimate, but one which clearly demonstrates the massively overbearing complex.

The developers could have chosen to mitigate such concerns by leveling the slope, but then the company's estimated £10-20 million in profit (as per the publicly-stated developer estimate given at the June 2016 meeting) would be mildly decreased.

Additionally a developer-commissioned report on daylight losses caused by the tower complex concluded that the loss of daylight was "reasonable for an urban environment." Once again, this appears to confuse the true nature of the site, which as noted is suburban, not urban.

Shifting the building mass slightly to the west, and reducing the highest tower from 7 to 6 storeys, as the developer has done, does not meaningfully resolve any of these concerns.

### 4. Excessive density

The proposal crams 144 flats onto a plot of land where perhaps two dozen houses might fit. This extremely high density is simply unacceptable given the suburban nature of the neighbourhood. Such density would be appropriate next to a tube station in a busy town, but not in an area entirely dominated by 1930s terraces and semis. The density is of particular concern given the poor transport links (sections 9 and 10).

## 5. Dangerous precedent for loss of protected employment land

The project would set a very dangerous precedent by waiving the Haringey Locally Significant Industrial Site (LSIS) designation, converting classification of the land from commercial to residential use. Haringey's Local Plan specifically states:

“The Council will safeguard the following sites as Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business: ... White Hart Lane, N17.”  
– Local Plan 5.1, page 91

As recently as February 2015 the Council noted that, regarding Defined Employment Area “DEA 17 White Hart Lane”:

“The current LSIS designation is appropriate for the site as it safeguards B class uses.”  
– Haringey Employment Land Study Final Report, page 31

However, if this housing proposal goes ahead, we predict that within a decade the entire White Hart Lane LSIS (of which 500 WHL constitutes about 10%) will most likely be gone. This is because demolishing existing warehouses and adding flats would be more profitable in the short term. And that would be contrary to the specified intent of Haringey's recently approved Local Plan.

*This decision is not just about one development – it's about the future of the entire western White Hart Lane area.*

## 6. Poor arguments for removing LSIS protection

The grounds for removing LSIS protection for 500 WHL are extremely weak. The applicant claims that there is no business case for maintaining employment in the area. But they also publicly admitted that they have not marketed the site, and considerable evidence exists that the site is indeed ideally suited for business. The adjacent neighbours – Selco, Screwfix, Tool Warehouse, et al – have been flourishing since their shops were built in 2011.

## 7. Poor site condition does not justify LSIS removal

A key part of the applicants' argument appears to be that the site is “derelict” and “abandoned”. These descriptions are apt, but only because the developer has deliberately allowed the site to fall into a parlous shambles since purchasing it in 2009. In contrast to the well-maintained warehouses and retail



outlets next door, 500 WHL is an eyesore, barricaded by peeling, disintegrating, and unpainted hoarding. In June 2016 one of the derelict buildings actually caught fire.

In fact, the developer used the southern end of the site as a dumping ground for the stadium's raw aggregate (gravel) for six months in 2016. In a residential area and, we understand, without proper planning permission.

The developers' conscious choice to abandon the site does not constitute proof that business use is unsustainable, especially in light of evidence to the contrary on immediately adjacent land. (see above)



## 8. Commercial use claim

A small building in the northwest corner of the site has been identified in the proposal as “commercial”. In reality it's clear that few businesses would be interested in renting a small office deep in a housing development. In fact, placing commercial facilities at the end of a residential site, where children live and play, seems risky indeed. The applicants' plan itself noted that the “commercial” building has the “flexibility” to be easily converted into flats in the future.

The revised June 2016 proposal includes allowance for first-floor commercial space in the southernmost building. However, we note that no parking for these facilities is indicated on their proposed plans. (500 WHL Design and Access Statement, page 18)

“Parking for commercial vehicles should be provided at a maximum standard of one space per 500 sq. m of gross B2 or B8 floorspace”

– The London Plan, Parking addendum to chapter 6

The absence of retail parking would significantly hamper any attempt to market the commercial space to prospective businesses, since White Hart Lane has no on-street parking. Redesignating some residential parking to commercial, as we presume they would do, would still provide highly limited parking for business, but at the expense of resident parking.

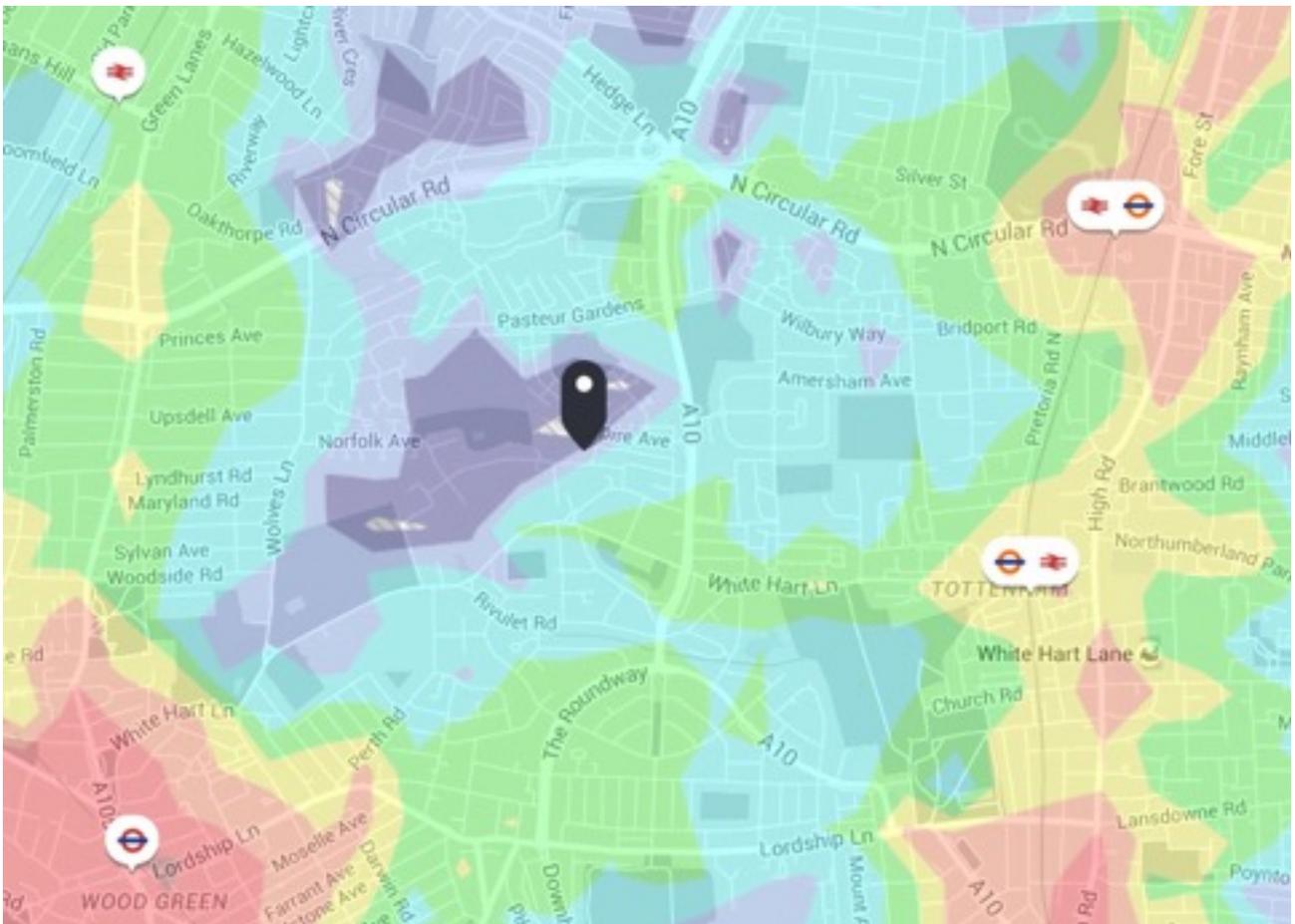
Therefore this project is essentially residential, with the commercial aspect an easily removed and unsustainable afterthought. The developer has not produced a convincing argument that current employment levels will be retained on the land.

## 9. Poor transport links

The area is in a notoriously poor transport black hole, as documented by Transport for London's WebCAT database. The site has a published PTAL (Public Transport Accessibility Level) of 2 of 6, reflecting its poor transport links. The next street northwest actually has a PTAL of 0 (zero; the worst possible rating) of 6. Please see the map on the next page.

TFL rather charitably estimates that the PTAL might be upgraded to 3, based on theoretical improvements to, one presumes, W3 route frequency. But that is a highly hypothetical situation. At present the W3 is infrequent, and generally does not stop to permit passengers to board at Haringey Football Ground (the nearest stop) on weekday mornings, since it is packed with schoolchildren.

Note that we refer solely to the W3. This is not just because it's the closest route to the proposed site, but also because it reflects actual transport usage patterns. The W3 travels west to Wood Green tube station and the town centre. Other buses, such as those on the Great Cambridge Road, do not travel to key destinations in the area; a factor not reflected in the PTAL score.



*Public transport accessibility level of 500 WHL. Purple and grey are low values.*

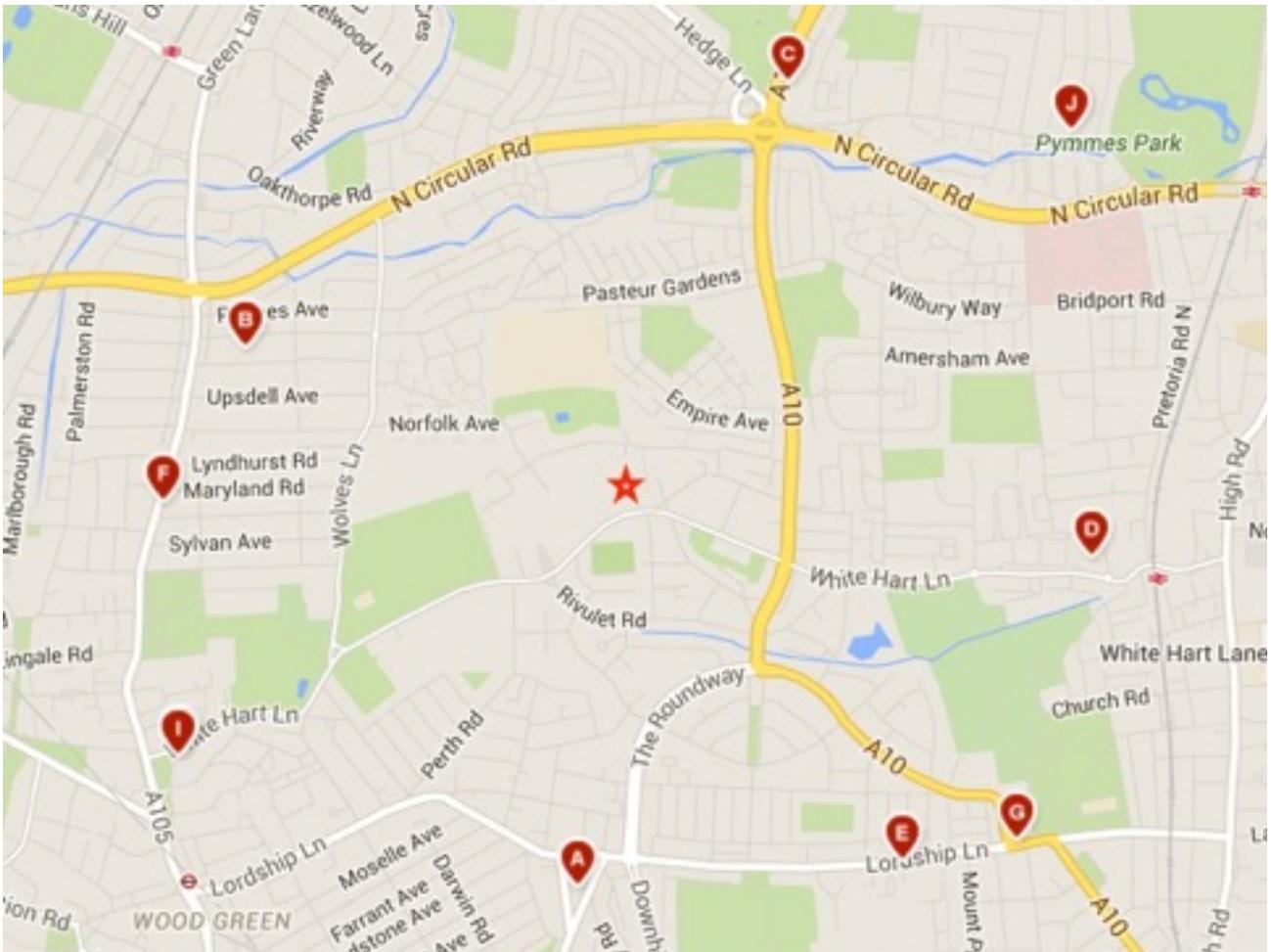
Adding a population equivalent to *all of western Devonshire Hill Lane* overnight to such an area is inappropriate. The suggestion of the developers that people will happily walk for health reasons is utterly absurd, especially since the project is being marketed to families, many of whom will have pushchairs and small children. Residents would have to walk, over 1/2 hour on foot given a brisk pace, to any train or tube station (Wood Green, White Hart Lane, Bowes Park, and Silver Street are roughly the same distance, as shown above). There are also no bike routes in the area.

Additionally in June 2016 the representative for Haringey's regeneration team stated that many elderly people would be encouraged to relocate from Love Lane. This would see them leave an area immediately next to a railway station, to the relatively remote reaches of 500 WHL.

Adding 144 flats, and thus perhaps 400+ new residents, is not sustainable given the poor public transport links and insufficient parking. With multi-bedroom flats, there may easily be 200+ children, and parents with buggies.

## **10. Poor essential services/amenities**

General services are poor and are unlikely to improve in the immediate future. There are no doctors' surgeries within a kilometre of the site, and some nearby surgeries are not accepting NHS clients. Please view the map on the next page, taken from the NHS website, showing surgeries in the wider area. Note that none are within walking distance for the elderly.



*Closest NHS surgeries to 500 White Hart Lane (red star)*

The nearest hospital's A&E department (North Middlesex) is on the verge of collapse and may be closed. There are virtually no shops or cafés. This may be acceptable in a medium-density area with many car-owning residents. But it is an area unsuitable for high density development.

London is indeed suffering from a housing crisis, but the solution is not to shoehorn excess flats into areas with poor transport and amenities. Doing so would clearly fan the flames, making things worse.

### **11. Local school and playground capacity is limited**

The developers are aiming to attract families, given the breakdown of flat sizes. Yet based on our research, local schools are near capacity. It's irresponsible to import so many children when few school spaces are available. The sole nearby playground, other than a tiny play area in the development, is in Enfield. Most of the other greenspace is in the form of empty playing fields. Where will 200+ new kids go to school and entertain themselves? Such a situation bears a high-risk potential for creating a new source of antisocial behaviour, based on decades of research – the classic “trapped on the estate” situation.

The area at present has relatively low crime, despite modest average income levels. Occasional flytipping is the primary crime-related concern of local residents. It is clearly not in the financial interests of Haringey Council to create a situation that encourages costly antisocial behaviour, and it is clearly not in the social interest of the neighbourhood as a whole.

## 12. Insufficient on-site parking

75 parking spots for 144 flats is vastly insufficient. Nearly every home in the area has one or two cars, owing to poor public transport links. Building parking spots for fewer than half the proposed flats may satisfy a tickbox on a form, but will create tremendous overspill problems. 0.4 spots per unit may be the base requirements for an “average” London location, but this is not average: it’s a transport-deprived location.

TFL states: “All developments in areas of good public transport accessibility should aim for significantly less than one space per unit.” The developers have certainly achieved less than one space for unit – in an area with terrible public transport!

Once again, this plan appears erroneously to suppose that the site is in an urban area with excellent transport links. With so few parking spots, parking will undoubtedly fill up nearby streets (especially Fenton Road, Devonshire Hill Lane, and Devonshire Road); roads already struggling with parking issues.



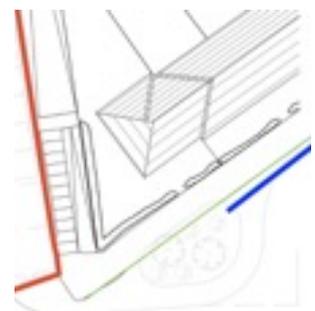
*Typical street parking congestion on nearby Norfolk Avenue.*

The developers, aside from cheerful statements that the lack of parking spots will encourage people to walk (a mile to the nearest station), did not provide any meaningful resolution to this problem when asked in June 2016.

## 13. Deletion of existing parking

To add insult to injury, buried in the proposal’s diagrams is mention of a plan to narrow White Hart Lane where it meets Devonshire Gardens, apparently in order to install a pair of decorative trees. This will result in the loss of 2-3 residents’ parking spots.

The diagram to the right shows the existing road routing in green, with the proposed decorative trees in light grey below. The area in blue shows where existing street parking would be taken from residents.



#### **14. Decreased integration with the public realm**

An earlier version of the proposal claimed that antisocial behaviour in the neighbourhood might be reduced, since the public footpath linking White Hart Lane and Devonshire Hill Lane would be opened up to the “beautifully landscaped” grounds of the development.

The DHRA believed this to be a weak claim, but the revised proposal of June 2016 essentially eliminates it, since half the footpath will now back onto a linear parking lot. A parking lot isn't a particularly harmonious integration with the public realm. Indeed, it's a barrier.

#### **Additional concerns**

In addition to the material planning concerns listed above, the Devonshire Hill Residents Association has numerous other concerns regarding the proposed development. We believe these are significant and germane to the case at hand.

#### **15. 500 WHL must be considered as its own project**

The proposed development of 500 White Hart Lane must *not* be considered in connection with the Spurs' stadium development in Tottenham, despite evident political pressure. In particular, it must not be seen as a simple and profitable add-on bonus to the stadium project, and it must not be seen as a convenient destination to rehouse some of the families rendered homeless by the developers' demolition of the Love Lane estate.

500 White Hart Lane must be considered on its own terms – whether it is right for the location and community. And we feel obliged to point out that there seems to be some confusion in this respect. Despite the address “White Hart Lane,” suggesting the site is near the football stadium, it is actually in a leafy residential area, as well established in this document.

#### **16. Listening to the community**

The applicant claims to be listening to the community. Following the December 2015 meeting, where residents expressed concern over the excessive height of the building and the number of flats, the applicant filed a proposal with taller towers (three 7-storey buildings versus one) and more flats (145 versus 140). In June 2016 it lowered the overall height to a still-excessive 6 storeys, but effectively preserved the excessive density (144 flats versus 145).

These token gestures do not constitute listening to the community, which has been uniform in its opposition to inappropriate development, especially height and density.

#### **17. Social/affordable housing**

Very little mention has been made of social or even "affordable" housing. The project has already been marketed repeatedly to Love Lane residents with no indication of how these residents would be expected to afford such a flat. The net result will be an overall decrease in affordable homes in Haringey. We presume that many, if not most, flats will be purchased by non-residents as investments, which is not a recipe for improving a community.

## 18. Alleged bus stop replacement

At June 2016's public meeting the developer boasted how they planned to replace the missing bus shelter in front of 500 White Hart Lane (it was damaged by a car in late 2015). This gesture was apparently intended to indicate the depth of the company's public spirit.

In fact, TFL indicated in an email to the DHRA on 15 March 2016 that plans were already underway to replace the shelter. Even if they were not, bus shelters cost little more than a few thousand pounds. Given the project's profit targets in the tens of millions, as the developers stated in June 2016, this repeated emphasis on a bus shelter did not receive public acclaim at the meeting. A much-needed puffin pedestrian crossing, assuming that the cost is *not* simply deducted from the CIL contribution, would have been a slightly more reasonable offer, especially given the massive increase in pedestrian traffic that would be created by the development.

## 19. Attempts to limit public information

Finally, we wish to express our strong concern that attempts have been made to limit information available to the public. A planning forum was held in December 2015, ostensibly to inform the public. However, notices were distributed to the neighbourhood the day *after* the event had already been held. In June 2016, in response to a request from the Devonshire Hill Residents Association, another meeting was held. Yet local elected councillors were *not informed* of the event and not invited. On both occasions the fora were held in a community centre located close to a mile away from the site, in a building that was very difficult to find.

We trust that these actions were pure oversight, rather than reflecting the view that public consultation is little more than an inconvenient statutory obligation. We're sure we're all in agreement that consultation should be an opportunity for all stakeholders to participate meaningfully in the process.

## Ideal uses of the site

We believe that the site would be ideally suited to neighbourhood-relevant retail, including a small supermarket and a doctor's surgery. Given the complete absence of decent shopping facilities in the entire neighbourhood it's probable that such an establishment would do very well. And since the site isn't large enough for a large "destination" supermarket, there would be no planning conflict with the London Plan emphasis on siting large shops in main urban centres.

Such shops would be similar to the retail groceries at 421 High Road N22 8JD and 646 Lordship Lane N22 5JH, both of which have site-appropriate levels (two additional storeys) of flats above.

Another possibility would be a light industry/office complex aimed at local startups and other enterprises. These options would preserve the LSIS in accordance to Haringey's Local Plan.

**Regardless of the final outcome of the project, it is essential that Haringey's published guidelines in the Site Allocations DPD and elsewhere not be exceeded. The maximum permitted roofline of the project must not exceed 4 storeys from the ground at the south end (White Hart Lane) and must not rise to an absolute height greater than the roofline of Devonshire Hill Lane to the north.**

## Summary

In short, the Devonshire Hill Residents Association believes there is considerable evidence that the proposed residential complex for 500 White Hart Lane outlined in HGY/2016/0828 will form a heavy economic and social burden, for both Haringey Council and local residents, for years to come. Simply boosting residential density without commensurate capacity, current and projected, in transport and services/amenities is neither sustainable nor appropriate.

We also question why the extremely reasonable statements in Haringey's Site Allocations DPD, Reg 18 Consultation Document concerning construction on 500 WHL should be ignored:

"Development *up to 4 storeys may* be possible on this site; higher generally closer to the industrial uses to the west and main road frontage, with *lower heights* on the parts of the site which interface with residential uses." (emphasis ours; DPD Reg 18, page 67)

The small amount of cash from developer contributions to the Community Infrastructure Levy (CIL) will not benefit local residents in any measurable way, and will not cover the long-term costs to the Council in the form of heightened demands on already-stretched local services, and increased antisocial behaviour.

In our view, this proposal does not pass the essential test that probable adverse impacts of a proposed development must not significantly and demonstrably outweigh the benefits.

We trust that sound planning principles will be applied and the proposal as it stands be rejected.

Thank you.

– the Steering Committee of the Devonshire Hill Residents Association.