

STATEMENT OF COMMON GROUND - HOUSING LAND SUPPLY

THE GROVE LAWN TENNIS
CLUB, CASCADE AVENUE,
N10 3PS

23 MAY 2025

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Prepared by: Firstplan Ltd on behalf of ROK Enterprises One Ltd and
Haringey Council.

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SECTION 1 | INTRODUCTION

- 1.1 This Statement of Common Ground - Housing Land Supply (SoCG) has been prepared by Firstplan Ltd in light of Haringey Council's updated Authority Monitoring Report (AMR) published in April 2025. The latest AMR now puts forward that the Council is able to demonstrate a five year supply of deliverable housing sites of 5.18 years.
- 1.2 This SoCG deals with matters relating to five year housing land supply (5YHLS) and details areas of agreement and disagreement between the Appellant and the Council.

SECTION 2 | MATTERS OF AGREEMENT

- 2.1 It is agreed that sites included in the five year supply must meet the definition of “deliverable” as set out in Annex 2: Glossary of the National Planning Policy Framework (2024), as follows:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”.

- 2.2 In addition, the Paragraph: 007 Reference ID: 68-007-20190722 of the Planning Practice Guidance (PPG) provides examples of the types of evidence, which could be provided to support the inclusion of sites with outline planning permission for major development and allocated sites without planning permission. This is, as follows:

In order to demonstrate 5 years’ worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. [Annex 2 of the National Planning Policy Framework](#) defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;*
- are allocated in a development plan;*
- have a grant of permission in principle; or*
- are identified on a brownfield register.*

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- firm progress with site assessment work; or*

- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

2.3 The table provided in Annex 2 by the Inspector has been completed below.

Table 1. Annex 2 – Five Year Housing Land Supply Calculation Template

	Council	Appellant	Comment	Note
What is currently the relevant five-year period for the purposes of assessing whether the Council has a five-year housing land supply?	April 2024 to March 2029	April 2024 to March 2029	Both parties are in agreement with the base date	
Housing Requirement				
Annual local housing requirement	1,592	1,592	Both parties are in agreement.	Usually taken from the development plan, or the calculation of Local Housing Need where strategic policies are more than five years old. See Paragraph 78 of the National Planning Policy Framework December 2024.
Five-year basic requirement for five-year period	7,960	7,960	Both parties are in agreement.	Annual requirement x 5
Buffer (if required)	5%	5%	Both parties are in agreement.	See Paragraph 78 of the Framework
Five-year requirement with buffer (if required)	482	482	Both parties are in agreement.	
Average annual requirement for five-year period	2,025	2,025	Both parties are in agreement.	Five-year requirement/5
Housing Supply				
Housing supply forecast for the five-year period		This is disputed, see section 3 below.		If disputed, please provide supporting evidence.
Final Calculation				
Five-year housing land supply	5.18 years	4.88 years	This is disputed, see section 3 below.	Housing supply/average annual requirement for five-year period (to be expressed as number of years).

- 2.4 It is agreed, that the NPPF (2024) provides a greater emphasis on making effective use of brownfield land, with Paragraph 125(c) stating that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused.

SECTION 3 | MATTERS OF DISAGREEMENT

a) The extent of the deliverable Five Year Housing Land Supply

- 3.1 The Council's AMR states that Haringey has a 5 year housing land supply (5YHLS) of **5.18 years**.
- 3.2 It is noted by the Appellant that the Council's past completions, as set out in Appendix B of the AMR, show a material under provision over the last three years, and that the future supply is not considered stable, with only an excess of 377 units identified by the LPA, as stated in Table A1 of the AMR.
- 3.3 Table A1 in the AMR lists a total of 75 deliverable sites. 14 of these sites are allocations and 4 comprise pre-applications.
- 3.4 A total of **1,415** dwellings, included within the Council's AMR, are disputed on 18 sites that are either allocated or at pre-application stage, these sites are identified in Table 2 below.
- 3.5 Sites at pre-application stage are not included in the definition of 'deliverable' as set out in the section above. It is not known when a planning application will come forward on these sites nor has any "clear evidence" been provided, to evidence firm progress towards the submission of an application or progress with site assessment work, which would confirm housing completions would begin within five years. Therefore, sites without planning permission or an application should be removed from the five year housing land supply unless robust evidence for their inclusion can be provided.
- 3.6 In addition, 14 sites are disputed which are identified as 'allocated'. The majority of these sites are allocated within the Council's Site Allocations DPD adopted in 2017. The timeframes suggested within this DPD are out of date and it is not clear if these site would come forward within a five year period. It is therefore considered that these sites all fall within category b) of the definition of 'deliverable', on the basis that the Council has not provided "clear evidence" for their inclusion. This is expanded on within Table 2 below.
- 3.7 Based on the above, if the below 18 schemes are excluded from the supply calculations the Appellant considers that the total 5YHLS would equate to **4.48** years.

Table 2: Disputed Sites

Address	No. of dwellings	Description	Appellant Comments
Site Allocations			
Arena Retail Park, Green Lanes, Harringay	200	Long-term potential for redevelopment of the existing retail park to produce a new high street frontage, access improvements to Harringay Green Lanes station and Finsbury Park, reconfigured road layout, and new residential and commercial development.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Morrison's, Wood Green High Road	40	Allocation / capacity work - Redevelopment of the supermarket and car parks to create mixed use development comprising of town centre uses on the ground floor, with residential above, and improved pedestrian connections within Wood Green.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided of the capacity work undertaken to confirm that the

			site will be deliverable within a 5 year period in accordance with category b) of the definition above.
225 High Road, 10-48 Station Road, 40 Cumberland Road, Wood Green, Arriva Bus Garage, Levene's High Road	50	Redevelopment of existing bus garage and office buildings to create new residential led mixed use development with town centre uses at ground floor, replacement employment floorspace, and new public realm.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Green Ridings House, High Rd, Wood Green	40	Redevelopment of existing telephone exchange and offices for residential and employment mixed use development.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Wood Green Library and Shopping Centre, Wood	44	Subject to reprovision of the existing library use, redevelopment to create enhanced town centre uses, a new library, residential development, and a new urban square with pedestrian and cycle route linking Wood Green High Road to Alexandra Palace.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Land South of Seven Sisters Road extending west of the Mainline Railway and East to the junction of Seven Sisters Road and St. Ann's Road, London	50	Comprehensive mixed use redevelopment in accordance with a site wide masterplan providing new employment space and residential use.	Unable to locate this site in the Site Allocations DPD (2017). No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Kingfisher Place, Coburg Road	190	This and adjacent sites along Coburg Road present a unique opportunity to extend Wood Green town centre westwards into the Heartlands area. The site is suitable for employment led mixed-use development establishing the northern edge of a new east-west link along Coburg Road Civic Boulevard linking Wood Green and the west of the Borough via the Penstock Foot Tunnel, with active frontages and a mix of employment uses above and to the rear of the site.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Haringey Job Centre, Guillemot Place, Coburg	20	Comprehensive redevelopment enhancing the Wood Green Cultural Quarter, including creation of a new	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from

Rd, Mayes Rd, Wood Green		north south link between Clarendon Rd and Wood Green Common	2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Hollywood Green, 180 Wood Green High Road, Wood Green	145	Potential for comprehensive mixed-use development with replacement leisure, town centre or employment floorspace and residential above, establishing an enhanced public plaza fronting Wood Green High Rd and Lordship Lane	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Bittern Place, Coburg Road, Wood Green	135	Extension of Wood Green Town Centre Westwards, including mixed use development comprising predominantly civic uses with a mix of residential and commercial above, the establishing of a new east-west link to Heartlands, including the creation of the eastern portion of a new Civic Boulevard.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
16-54 High Road, Wood Green, N22	125	The site has planning permission at the former BHS and M&S buildings, with the development known as Icon Heights at 42-44 High Road now complete. The remaining buildings along this frontage are suitable for comprehensive redevelopment for mixed use development consisting of town centre uses at ground and first floor level, with residential above.	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Wedge House, White Hart Lane, Tottenham	30	Potential mixed used development	There is currently a planning application pending for a change of use of office 2 to a community centre (ref: HGY/2024/2311). No clear evidence has been provided to confirm the site will deliver housing within a 5 year period, given there is currently an application for a different use pending determination.
Omega Works A, Hermitage Road, N4	76	Redevelopment of the site for a mixed-use scheme	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from 2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Omega Works B, Hermitage Road, N4	36	Redevelopment of the site for a mixed-use scheme	The site is allocated in the Site Allocations DPD (2017) with an estimate timeframe of delivery from

			2011 until 2020. No clear evidence has been provided to confirm the site will be deliverable within a 5 year period in accordance with category b) of the definition above.
Pre-apps			
Parma House, Clarendon Road	14	units to the rear of Block B of approved scheme	This site is still at pre-app stage and there is no clear evidence of deliverability within a 5 year period.
Wellington Gyratory, Archway Road	16	units, Council-led affordable housing scheme	This site is still at pre-app stage and there is no clear evidence of deliverability within a 5 year period.
Timber Merchants, 289 High Road, Wood Green	43	Mixed use commercial and residential redevelopment scheme	This site is still at pre-app stage and would be a major planning application. There is no clear evidence of deliverability within a 5 year period.
Mallard Place	161	Redevelopment for mixed use workspace and residential. Council led scheme.	This site is still at pre-app stage and would be a major application. There is no clear evidence of deliverability within a 5 year period.
TOTAL	1,415		

b) Summary

- 3.8 If the above sites identified are excluded from the supply calculations, the Council will not be able to demonstrate a 5YHLS.
- 3.9 Notwithstanding this, it is the Government's overwhelming aspiration to make use of brownfield land for housing in sustainable locations, such as this appeal site, with the aim to make 'as much use as possible of previously developed land'. 5YHLS requirements in the National Planning Policy Framework (2024) are expressed as minimum and not maximum targets, this is a benchmark to ensure a sufficient supply of homes is planned for and not a limit on how much development can occur. It is also noted by the Appellant that this has also been recognised in numerous appeal decisions where additional housing above the requirement was considered to not be harmful, but beneficial.

SECTION 4 | DECLARATION

Signed on behalf of the Appellant 	Signed on behalf of the Council 
Date: 23 May 2025	Date: 23 May 2025
Position: Director (Firstplan) on behalf of ROK Enterprises Ltd	Position: Matthew Gunning, Team Manager, Development Management, Haringey Council

