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2<sup>nd</sup> March 2016

**SENT VIA EMAIL ONLY**

Dear Sirs

**CONSULTATION ON DRAFT LOCAL PLAN (PROPOSED SUBMISSION VERSION) & WOOD GREEN AAP (ISSUES & OPTIONS): Land at Railway Approach, Hampden Road, Hornsey, N8 0HH**

I write in respect of the current public consultation being undertaken by the London Borough of Haringey on their proposed Draft Site Allocation Development Plan Document (SADPD), Alterations to Strategic Policies 2016-2028 (including the Strategic Policies Map), and Draft Development Management Development Plan Document (DMDPD) Proposed Submission Versions, and with specific regard to the land at Railway Approach, Hampden Road in Hornsey ('the site').

In addition, these representations also provide a formal response to the Council's current consultation on the Wood Green Area Action Plan (WGAAP) Issues and Options, again with specific regard to the land at Railway Approach, Hampden Road in Hornsey. For reference, a site location plan is enclosed.

Site and Surroundings

The Hampden Road site is located wholly within the Haringay ward of the London Borough of Haringey and comprises a triangular site of previously developed brownfield land.

The existing site comprises two parcels. The first (and larger parcel to the west) comprises a steel yard site with hardstanding open storage and a number of single storey buildings. The second parcel of the site (at the east) comprises two buildings, one at 3 storeys and the other at 2 storeys in height, and a car parking area. Both parcels of the site are securely fenced with separate accesses taken from Hampden Road, which is privately owned. Existing trees are located on the north/east boundary of the site.

The surrounding area comprises a railway line and Hornsey Train Station to the west accessed by a pedestrian bridge from Hampden Road, these railway lines serve the mainline railway station as well as the Network Rail Hornsey Railway Depot, which is located to the south of the site on the other side of Hampden Road. To the north/east of the site is the New River, which lies outside of Fairview's ownership.

### Site Designations

The site is located within an Ecological Corridor and a designated SINC of Metropolitan Importance, the site is adjacent to a proposed Green Chain and the Blue Ribbon Network. The site is not located within a conservation area and there are no listed buildings or protected trees on the site or on adjacent land that would affect the redevelopment of the site.

### Pre-Application Discussions

Fairview have held pre-application discussions with Officers to discuss the redevelopment of the site. An initial meeting was held in June 2015, with a detailed pre-application response provided. Since this time the proposals have been developed further and a follow up pre-application meeting was held in January 2016 with a further meeting proposed in early March 2016. In addition, a presentation to the Council's Quality Review Panel and Development Management Forum will be held in March and then the scheme will be present to the Council's pre-application Committee in April 2016.

In addition, Fairview have commenced an extensive public consultation exercise with the local community and key stakeholders. This has involved discussions with local Councillors and local community groups such as the Ladder Community Safety Partnership and Wightman Road Mosque. Discussions with key stakeholders have been constructive and informative, as well as being broadly supportive of housing delivery in the area.

### **DRAFT SITE ALLOCATIONS DPD**

The site is identified within the draft SADPD as "*SA 17: North of Hornsey Rail Depot*" and the address is specified as "*Land between the New River, the Great Northern Rail Line, and Hampden Road, Harringay N8*".

Fairview wish to promote the Hampden Road site as part of the emerging Draft SADPD consultation for a residential-led mixed use redevelopment to deliver up to 182 new homes and commercial floorspace, with the aspiration to deliver the new homes and commercial space within the next 3 years.

However, Fairview have a number of concerns with the Council's proposed submission version of the Draft SADPD and the assessment and commentary that is included within the draft policy. These concerns are outlined in further detail below.

### Net Residential Units

The draft SADPD makes reference to an indicative development capacity of 56 no. residential units. Notwithstanding this is described as "*an indicative minimum, not prescriptive*", this provision is well below the development capacity of the site and would not represent an efficient or effective use of previously developed brownfield

land for housing delivery, as emphasised at all levels of planning policy, particularly at a national level and within the London Plan.

This number of units would represent a density of 80 units per hectare. Whilst the PTAL rating of the site is 4, the site is located adjacent to Hornsey Train Station (served by a number of regional trains with services into Central London) and Turnpike Lane Underground Station (served by the Piccadilly Line and possibly a Crossrail 2 station in the future), as well as number of local bus services available along Turnpike Lane. It is therefore felt that the Council's assessment of development capacity is not considered sound or appropriate.

Policy 3.4 of the London Plan (Further Alterations: March 2015) relates to Optimising Housing Potential which provides a density matrix at Table 3.2 for new development in London based on PTAL ratings and the setting of the new development. Based on the site's PTAL and 'urban' location, Table 3.2 states a density range of 45 to 260 units per hectare. For the Hampden Road site this would translate to between 32 units and 182 units being considered appropriate within the London Plan specific density ranges.

Fairview have held a pre-application meeting with Officers at the GLA. Officers raised *"no specific strategic issue in terms of proposed building heights"*. Officers further advised that the density matrix within the London Plan should not be applied mechanistically and promoted a design-led approach to residential density.

Owing to the site's location adjacent to a train station, no impact on daylight/sunlight/overshadowing, Growth Area allocation of the site, and *"highly accessible location"* (as stated in the draft SADPD), the site is considered to be appropriate for the delivery of a high density residential-led development. In this regard, it is proposed that the indicative capacity be changed to *"up to 182 units"* to reflect this.

#### Employment Floorspace Reprovision

The draft SADPD makes reference to an indicative development capacity of 930 sqm of new employment floorspace. The site does not sit within a designated Defined Employment Area and does not form part of any local or strategic employment area designation.

Fairview are proposing to deliver development on this site within three years. Whilst the Haringey Employment Land Study (February 2015) does indicate there is demand for employment floorspace, the study assesses this demand up to 2031.

In respect of office accommodation, the study states that *"Haringey has a relatively weak office market"* and the low level of demand tends to be for smaller sized units up to 185 sqm. In addition, the study states that the development pipeline for office floorspace indicates there will be a substantial net gain in the amount of office accommodation in the borough.

Whilst Fairview's emerging proposals for the site are likely to incorporate non-residential employment floorspace, the quantum of this should be realistic and based upon market demand in the local area.

Fairview have taken advice from leading commercial agent Jones Lang LaSalle who have experience in the local market. They have advised that there is very little demand for office floorspace in this location, which is a position that is unlikely to change in the next 3-4 years.

JLL have advised that the provision of 10,000 sqft of office floorspace at this location, as proposed by the draft SADPD, would be entirely inappropriate and have advised that a lower provision of approximately 1,000 to 2,000 sqft would be more appropriate, but that it may still struggle to find an occupier.

On this basis, the level of employment floorspace to be re-provided on the site as part of any redevelopment (particularly in respect of the 3 year timescale for delivery of the scheme) should be based upon market evidence and the likelihood of the floorspace being occupied upon completion.

The 930 sqm (10,000 sqft) quoted within the emerging draft SADPD is not considered a sound, reasonable or realistic quantum to be provided on the site as part of any redevelopment, with little apparent justification for this significant quantum of employment floorspace. On this basis, it is strongly suggested that this figure be reduced to 150 sqm.

### New River Path

Bullet point three under the heading Site Requirements on page 51 states '*enhancement of the New River Path should be provided as part of the development*'. Under the heading Development Guidelines on page 51, bullet points four and five state that the development should create access to the New River and that opportunities should be explored to enhance access, safety and appearance of the New River.

Fairview support the Council's aspirations to facilitate the New River Path and improvements to the New River, recognising the benefit this will have on the redevelopment of the site. However, the land and the river are not within the control of Fairview and the entirety is in third party ownership. Fairview therefore have no legal right to provide or promote access onto this land or to provide a path. Any requirement on Fairview to facilitate access onto third party privately-owned land and to deliver a path would therefore be *ultra-vires*.

On this basis, the development cannot provide enhancement of the New River Path or promote access to the New River as stated within the draft SADPD. It is therefore strongly recommended that the above significant constraints are recognised and these requirements are removed from the site allocation or amended to recognise these significant issues.

### Pedestrian Bridge and Hampden Road

The draft SADPD states that “*development should be used as an enabler to improve access to the bridge*” which would involve “*improvements to Hampden Road and consideration of how access to Hornsey Station can be made more accessible*”. The draft SADPD further states that “*the pedestrian bridge over the rail line should be improved to create improved access across the railway line*”.

Fairview support the Council’s aspirations to facilitate enhanced access to Hornsey Station and improvements to Hampden Road, recognising the benefit this will have on the redevelopment of the site. However, Hampden Road and the pedestrian foot bridge across to Hornsey Station are not within the ownership or control of Fairview and they are both within third party private ownership. Any requirement on Fairview to provide enhancements to the road or pedestrian footbridge is beyond the control of Fairview and would be *ultra-vires*.

In this regard, it is strongly recommended that these constraints are recognised and the requirements are removed from the site allocation or amended to recognise these significant restrictions to deliver enhancements.

### Proposed Site Allocation DPD

In light of the foregoing, it is recommended that the text at paragraph 2.46, which provides a summary of the site allocation, should be amended to read as follows:

*“Residential-led mixed use development securing, where feasible, improved pedestrian and cycling link to Hornsey rail station and the west of the borough, and improvements to the New River Path, where feasible.”*

Reviewing the draft site allocation in further detail, the site plan shown on the draft document has a coloured up green area across the existing steel yard site, however this is not the case. The steel yard site comprises hardstanding and buildings, which should be reflected on the site plan to avoid any misrepresentation. Reference is also made in the allocation to a locally listed building at King Road. Upon review of the Council’s local list, no reference can be found to King Road.

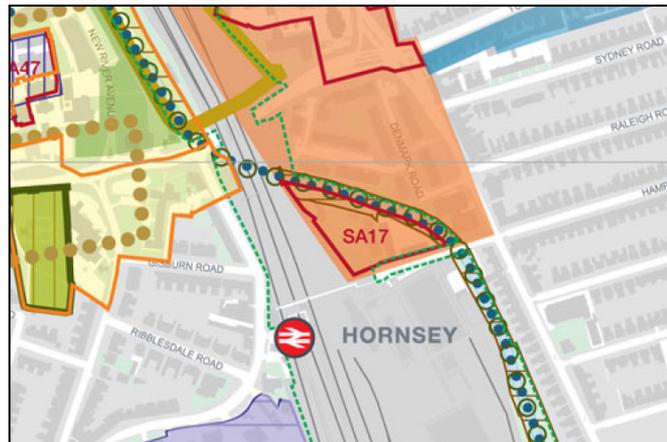
The Council have not made reference to the draft site designation whereby the site is proposed to form part of the Wood Green Growth Area, as highlighted on the Council’s Alterations to Strategic Policies (including the Strategic Policies Map). It is therefore suggested that this be referenced in the “*planning designations*” list.

### **DRAFT ALTERATIONS TO STRATEGIC POLICIES 2016-2028 (INCLUDING THE STRATEGIC POLICIES MAP)**

The Council are proposing the site forms part of the designated Wood Green Growth Area which will be further established through the emerging Wood Green Area Action Plan (the Issues and Options of which is currently out for consultation and our formal

representations are detailed later in this text). An extract of the Strategic Policies map identifying the site as “SA17” is shown below.

The orange shaded area is the designated Growth Area. This designation of the site is supported by Fairview and represents the exceptional opportunity that exists to deliver a high quality residential-led mixed use development that will provide new homes on a previously developed, underutilised brownfield site in a highly accessible and sustainable location.



### **DRAFT WOOD GREEN AAP (ISSUES & OPTIONS)**

Upon initial review of the Council's Issues and Options for the Wood Green Area Action Plan (WGAAP), the subject site at Hampden Road is not included within the boundary for the AAP. However, as detailed above, the Council's Strategic Policies Map proposes to include the site within the Growth Area. On this basis, the WGAAP boundary should be amended to include the site and reflect the Council's Strategic Policies Map.

Notwithstanding the AAP boundary, the Issues and Options document does make reference to the site. On the “*indicative building heights*” plan, the site is identified for 4-6 storeys. This is not considered an appropriate capacity for the site and does not make efficient use of a previously developed site with very good access to public transport.

Reference is also made to the above commentary in respect of site density/capacity and the opportunity to deliver a high quality residential-led development that will deliver much needed housing for the area and provide physical regeneration to a currently under-utilised and redundant brownfield employment site.

### **DRAFT DEVELOPMENT MANAGEMENT DPD**

#### **Building Heights**

Draft policy DM6 relates to tall buildings and states that they will only be acceptable in areas identified on Figure 2.2 within the document, which includes the area “Wood Green & Haringey Heartlands”. The site sits outside of this designation in contrary to the Strategic Policies Map which shows the site forming part of the Wood Green Growth Area designation (as referenced above).

In order to ensure consistency across policy documents, it is suggested that the site be included within the “Wood Green & Haringey Heartlands” designation to confirm the site’s appropriateness for the provision of tall buildings.

### Loss of Employment Land and Floorspace

The government are placing significant emphasis on the reuse of redundant or under-utilised employment land to deliver the new homes that the country needs. This is particularly the case across London, where the housing need is the greatest. The London Plan requires the Council to deliver 1,502 new homes per annum and these proposals would make a significant contribution to meeting this target. The London Plan also confirms this target is a minimum and should be exceeded wherever possible.

Draft policy DM40 states that the loss of non-designated employment use will only be permitted where, inter alia, there is clear evidence of an open and recent campaign to market the site for a period of 3 years. The requirement to undertake a 3 year marketing campaign is onerous and it is strongly suggested that a more pragmatic approach is taken by the Council.

As stated within the draft policy commentary, a statement and evidence to demonstrate the site is no longer suitable or viable for existing or alternative employment uses should be provided. In respect of the Site, Jones Lang LaSalle as commercial agents and knowledgeable of the local market, have advised that the existing uses and buildings on the site are outdated and without significant investment would be unlikely to attract a long term employment occupier or investor. They have further advised that there is little or no long term prospect of the site continuing for a sole employment use.

Furthermore, when preparing this policy, there appears to have been no consideration given to permitted development legislation which allows B use land and buildings to be changed in use to residential under permitted development rights, subject to prior approval. In respect of the Site, this would establish the principle of the change of use to residential and demonstrates that, even without redevelopment, the existing employment uses could be entirely lost to residential floorspace.

In this regard, it is strongly suggested that the emerging policy give consideration to permitted development rights and take a more pragmatic approach to the redevelopment of employment land, particularly given the regeneration benefits that physical development often provides, as well as the opportunity to maximise housing delivery to meet or attempt to exceed the London Plan housing delivery requirements.

### CONCLUSIONS

In light of the foregoing, Fairview support the principle of the Council’s allocation of the Railway Approach site for a residential-led mixed use development, in line with our formal representations outline above.

Fairview further support the allocation of the site as part of the Wood Green Growth Area, but request that the remainder of the emerging policy documents reflect this Growth Area allocation.

I trust the above is clear and would appreciate confirmation of receipt at the earliest convenience. Fairview reserve the right to comment further on the Council's emerging planning policy. Please let me know if you have any queries in respect of the above.

Yours faithfully

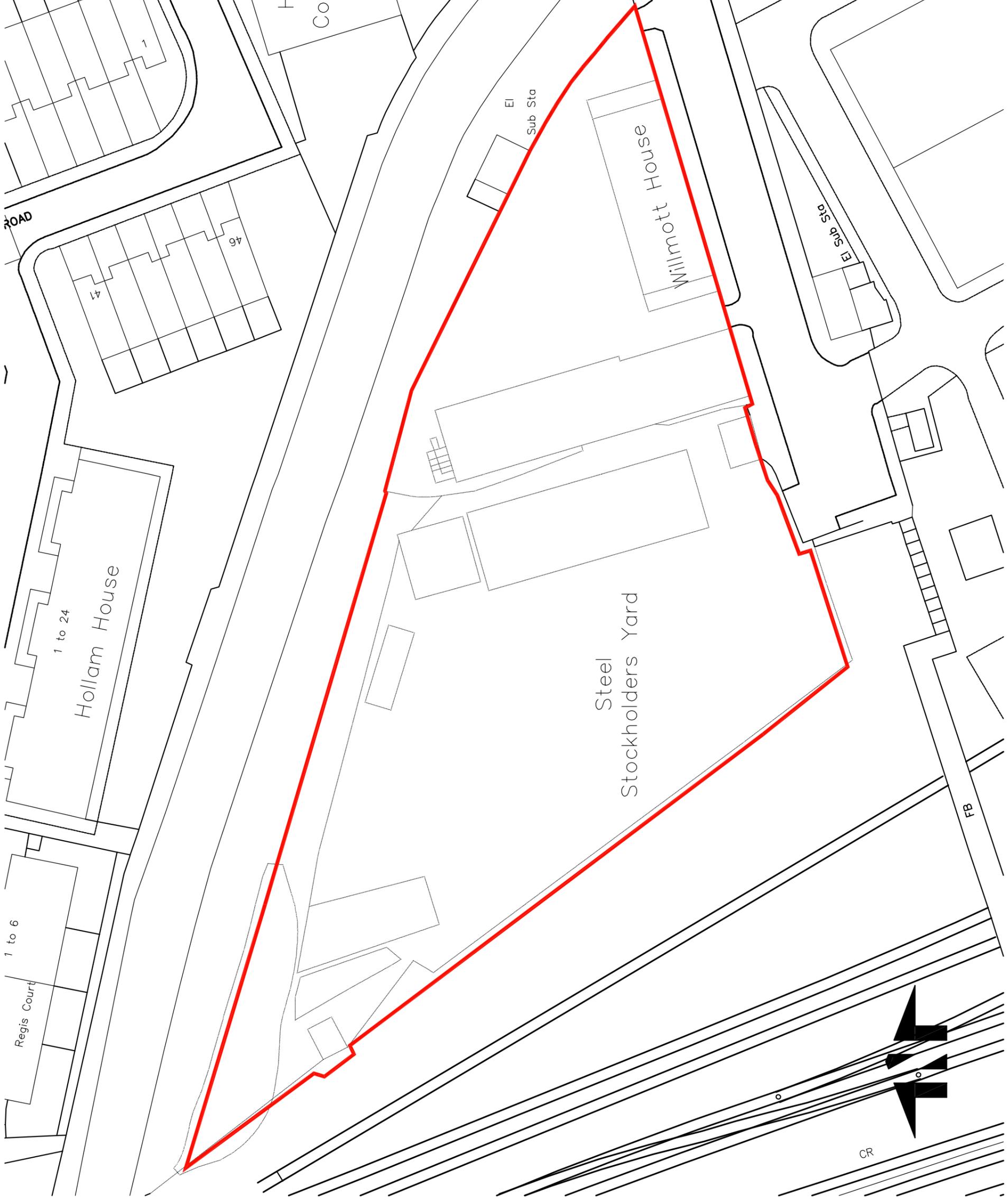


**Luke Cadman**  
**FAIRVIEW NEW HOMES**

cc. Valerie Okeiyi, London Borough of Haringey

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**Hampden Road  
Hornsey  
Site Plan**

Scale 1:500  
Date December 2015  
Drawn GR

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Drawing No. Revision

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