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Dear Sir or Madam

**London Borough of Haringey: Site Allocations Development Plan Document Pre-Submission Consultation
Representation on behalf of Kennet Properties Ltd**

These representations are made on behalf of Kennet Properties Ltd in relation to land at Hornsey Water Treatment Works. They are in response to London Borough of Haringey's consultation on their Site Allocations Development Plan Document Pre-Submission (SADPD) consultation.

Kennet Properties is a subsidiary development company within the Thames Water Group. Its remit is to identify land that is surplus, or will shortly become surplus, to the operational requirements of Thames Water Utilities Limited and to promote it for alternative use.

It is considered, as outlined below, that the SADPD is not Sound and that further opportunities are available for sustainable development within the Borough to meet the Borough's statutory requirement to meet its extensive minimum housing targets and contribute to housing delivery across London.

Site Allocations Development Plan Document Background

The London Borough of Haringey (LBH) commenced preparation of their Site Allocations Development Plan Document (DPD) in 2013 by carrying out a Call for Sites consultation. At this time Kennet Properties Ltd promoted the Hornsey Filter Beds site which comprises of an area of 0.7 ha in size.

In January 2014 Haringey published their DPD Regulation 18 consultation within which the Hornsey Filter Beds site was identified as site HO2. Kennet Properties Ltd responded to this consultation supporting the allocation.

The Regulation 18 DPD identified the site as site SA48, Hornsey Water Treatment Works (WTW). The proposed site allocation did not include the whole WTW site but only the southern two filter beds.

Kennet Properties Ltd continue to maintain that the WTW are suitable for residential use. The whole site is suitable for redevelopment subject to Thames Water's operational clearance. The filter beds provide the opportunity for an early phase of development to come forward followed by the remainder of the site.

In response to the current consultation stage, answers to Questions 3 to 6 of the Response Form are provided below; the Form itself is enclosed.



Local Plan Pre-Submission Response – Site Allocations Development Plan Document

Question 3. To which part of the Local Plan does this representation relate?

This representation relates to the document as a whole.

Question 4. Do you consider the Local Plan is Legally Compliant, Sound and Complies with the Duty to co-operate?

It is considered that the SADPD is not Sound.

Question 5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.

In order to consider whether a Development Plan Document (DPD) is Sound, reference needs to be made to the National Planning Policy Framework (NPPF), paragraph 182. This identifies that that a Sound plan is:

- Positively Prepared – ‘the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development’;
- Justified – ‘the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’;
- Effective – ‘the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities’; and
- Consistent with National Policy – ‘the plan should enable the delivery of sustainable development in accordance with the policies in the Framework’.

It is considered that the Site Allocations Development Plan Document Pre-Submission version is not Sound as it does not adequately seek to meet objectively assessed housing requirements, as outlined within the London Plan (2015, consolidated with alterations since 2011) and echoed within the Alterations to Strategic Policies Regulation 19 document (January 2016), and is therefore not Positively Prepared.

Identifying housing targets against the objectively assessed housing need, the London Plan, Table 3.1 (Annual average housing supply monitoring targets 2015 – 2025), outlines that LBH’s minimum ten year target between 2015 – 2025 is 15,019 net additional dwellings, at an annual monitoring target of 1,502. Alterations to the LBH Strategic Policies Pre-Submission Version document are being consulted upon in parallel to the subject consultation and seek alterations to the housing target to echo the provisions of the London Plan and seek to maximise the supply of additional housing to meet and exceed the target of 19,802 homes from 2011 – 2026.

To meet this housing target, the sites included within the SADPD provide an Indicative Development Capacity of Net Additional residential units, a Windfall Development Allowance and a summary of the housing delivery since 2011. A summary of the position is provided below:

	Source	
Site Allocations Total Yields (2016 – 2026)	SADPD	7,698
Tottenham Area Action Plan (TAAP) Delivery (2011 – 2026)	TAAP Paragraph 7.6	10,624
LBH Delivery outside TAAP Area (2011 – 2014) ¹	TAAP Paragraph 7.7	707
Total Identified Development (Including Delivery outside TAAP Area (2011 – 2014)		19,029
Minimum Housing Delivery Target (2011 – 2026)		19,802
Difference		773

¹ It is not possible to identify the delivery of homes outside of the TAAP area as the LBH Annual Monitoring Report (2013 – 2014) includes estimated delivery across the whole LBH area.

It is considered, as accepted at paragraph 4.10 of the SADPD, that the Windfall Development Allowance should not be counted against the anticipated delivery against the minimum housing provision target. Paragraph 48 of the NPPF notes that local planning authorities may make an allowance for windfall sites if they have compelling evidence that such sites have consistently become available within the local area and will continue to provide a reliable source of supply. There is no such evidence of this in LBH; given the time passed between the UDP and the Core Strategy, there is no possible differentiation between those sites which have been delivered and would have been planned for and those that are truly windfall development. For this reason, it is considered that a Windfall Development Allowance against the minimum target is not appropriate in this circumstance and, instead, the LBH Local Plan should seek to exceed, rather than simply meet, the minimum housing targets of the London Plan.

Whilst it is accepted that windfall sites outside of the identified supply may be forthcoming throughout the plan period, it is considered that an identification of residential development land deemed Deliverable over the plan period which is insufficient to meet the identified objectively assessed housing need for the Borough is not appropriate. The London Plan makes clear that the Boroughs should seek to exceed the minimum housing targets in order to meet the ever increasing housing need. These identified shortfalls, however small, against each target provide an insufficient base against which to ensure that the housing requirements of the Borough, and neighbouring authorities, are met within a plan-led planning system.

It is similarly considered that the SADPD is not Consistent with National Policy as it:

- Does not, as outlined above, adequately seek to boost significantly the supply of housing, as required of local planning authorities by NPPF paragraph 47.
- Ignores the opportunity for the effective use of land by re-using land that has been previously developed, in accordance with NPPF paragraph 111.
- Ignores an opportunity to identify a Developable site of specific supply for delivery through the plan period, as encouraged by NPPF paragraph 47.

Question 6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness.

Whilst Kennet Properties Ltd reserve the right to comment further on the remainder of the SADPD, one specific modification which, it is considered, would assist in significantly boosting the planned housing supply of the Borough and make full effective use of previously developed land is the re-inclusion of land at Hornsey Filter Beds as a housing allocation to include the full expanse of the previously developed Hornsey Water Treatment Works (WTW) area, bound:

- To the north by an open storage reservoir;
- To the east by New River, beyond which is the East Coast Main Line and Hornsey Railway Station;
- To the south by Greenways and the residential development beyond; and
- To the west by Newland Road.

The WTW is split into two key areas. To the north of the site there is a open storage reservoir and located to the southern end of the site is the operational works. The area covered by the operational works is wholly made up of hard standing with 4 large operational buildings standing 44.70 meters high. The wider MOL designation includes Alexander Palace and Park and the proposed site is separated from the Palace and Park by this open storage reservoir resulting in there being a disconnection between the proposed site and the wider MOL designation. It is considered that the site as a whole is Developable residential land given it is previously developed land and serves no Metropolitan Open Land (MOL) purpose, as considered below.

To be considered Developable, the NPPF, at the footnote to paragraph 47, outlines that sites are required to be located in a suitable location for housing development and with a reasonable prospect that the site is available and could be viably developed at the point envisaged. The site is Developable as it is located within a suitable location for housing as it is located sustainably, well related to the existing residential

neighbourhood. Similarly, the site can become available within the plan period subject to operational clearance from Thames Water.

To support the consideration of the delivery of the site as a whole, an Indicative Layout plan is enclosed, inclusive of desired links through the site from New River Path Subway to Alexandra Park. This plan illustrates an indicative yield of 460 residential units across the whole WTW site; although this yield will be subject to further detailed considerations, the capacity allows for substantial delivery of residential units.

As outlined above, a 0.7 ha area of the land fronting Greenways and Newland Road was included within the DPD Regulation 18 consultation, identified as site HO2. The LBH Site Allocations Consultation Report (January 2014) identifies a number of comments (SA1282 – SA1313) made in relation to this allocation. LBH have responded to a number of these comments indicating that the appropriate action is to remove the site from the document; the theme of such comments are provided below:

- MOL location
- Conservation Area location
- Alexandra Palace and Park in close proximity
- Nationally and locally significant listed buildings within proximity of the site
- Low rise development most appropriate
- Inadequate local service infrastructure
- Open space provision
- Re-use of filter beds as wildlife habitat

To assist in justifying the re-inclusion of the previously allocated area and an extension of this area to take full advantage of the sustainable redevelopment opportunity, an assessment of the points raised against the allocation has been provided below:

Metropolitan Open Land

The Greater London Authority (GLA) responded to outline that *'GLA officers take the view that as a first principle this site should be retained as part of a wider expanse of open space'*. The response continues to note that *'in broad terms, GLA officers are only in a position to consider a review of MOL boundaries where there are significant qualitative and / or quantitative benefits in terms of MOL quality and the appreciation of openness.'* It is considered that this does not result in the site being inappropriate for development but, instead, that further assessment is suggested as appropriate.

As noted by the GLA's consultation response, LBH is currently in the process of developing a Wood Green Area Action Plan, incorporating the WTW site, and is consulting on an Issues and Options version of the plan between 8 February and 20 March 2016. Kennet Properties Ltd fully support a review of the MOL within LBH and specifically within the Wood Green area and the WTW sites. To support the allocation of the 0.7 ha site within the DPD Regulation 18 consultation, Kennet Properties Ltd presented representations which outlined the case for a review of the MOL in this area. To reiterate the need for the review in this area the representations made to the DPD Regulation 18 consultation are enclosed for further consideration.

Historic Environment and Development Height

As noted above, consultation responses made note of the Hornsey Water Works & Filter Beds Conservation Area location, the proximity of the site to Alexandra Palace and Park and the proximity of nationally and locally significant Listed Buildings to the site. It is considered that the setting of Alexandra Palace does not preclude development of the subject site, being some distance from the site, having consideration of the substantial levels differentials between the Palace and the site and being disconnected from the Palace by, most immediately, an open storage reservoir. It is similarly considered that Alexandra Park does not preclude the redevelopment of the WTW and instead provides a baseline against which development proposals should be sensitive.

As outlined previously, in regards to openness, the operational works at the site are wholly made up of hard standing with 4 large operational buildings standing 44.70 metres high; against this baseline it is considered that residential development can be sensitively accommodated at the proposed allocation site.

Inadequate Local Service Infrastructure

One consultation response noted that residential development brings with it an increase in the resident population and a potential requirement for further social infrastructure as a result. A planning application for the development of the site will be required to test the impact of the proposed development upon the social infrastructure within a reasonable catchment and impacts will be mitigated either through provision of improved services, the Community Infrastructure Levy regime or specific financial contributions relating to specific impacts. Development is not precluded by untested social infrastructure requirements.

Open Space Provision

As noted previously, the site does not currently benefit from public access and, as such, redevelopment of the site provides opportunity for desirable public access, as illustrated by the enclosed Indicative Layout plan.

Potential Wildlife Habitat

Redevelopment of the site provides further opportunities for environmental and ecological enhances far and above any retention of the filter beds. The proposed, brownfield, redevelopment site excludes the existing open storage reservoir, which will thus be retained and provides for wetland habitat.

Conclusion

In conclusion, it is considered that the SADPD is not Sound as it is not Positively Prepared or Consistent With National Policy, having regard to the statutory requirement to meet the Borough's, and London's, extensive housing requirements.

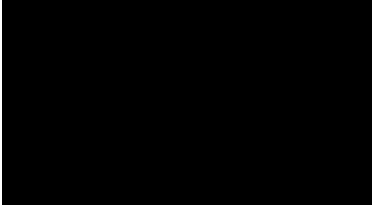
To assist in the identification of Developable land to meet these housing needs, Kennet Properties Ltd continue to maintain that the WTW site is suitable for redevelopment for residential use: the site is adjacent to an existing residential neighbourhood and directly adjacent to existing residential development; is located adjacent to the West Coast Main Line and within close proximity of Hornsey Railway Station; and provides an opportunity to yield a significant number of residential units within the context of London's housing shortage and LBH's significant minimum housing delivery target. In this context it is concluded that the redevelopment of the site should be a priority of LBH given its stated commitment to sustainable development.

Further to the test of a Sound plan outlined within the NPPF, the site is Deliverable and thus will not compromise the plan being Effective.

Kennet Properties Ltd reserves the right to comment further upon the SADPD and it is requested that participation at the oral part of the examination be agreed, given that this is a site of significant development opportunity and thus provides for strategic benefits across the Borough.

I trust that this response provides sufficient detail and consideration of the planning issues surrounding the allocation of the Hornsey Water Treatment Works site for residential redevelopment but, should you require any further information, please do not hesitate to contact me.

Yours faithfully



Adam Wadsworth
Planner

Enc. Haringey Local Plan Pre-submission Response Form
Indicative Layout plan
Kennet Properties Ltd Representation on Site Allocations Development Plan Document Preferred
Options Consultation