

**Subject:**

FW: Comment on a Draft Proposal in the Wood Green Area Action Plan

**From:** Joseph Nicholas

**Sent:** 16 April 2017 13:57

**To:** LDF

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To Whom It May Concern

I am responding to the proposal in the Wood Green Area Action Plan to rezone the Hornsey Filter Beds for housing -- WG SA25 on pages 161-162.

This former waterworks site at the eastern end of Alexandra Park includes the open reservoirs and an area of hard standing that was designated as Metropolitan Open Land (MOL) and was included in the Borough's previous statutory plan -- the Unitary Development Plan -- adopted on 1 November 2006. When operational, these filter beds provided a habitat for many insects, which in turn supported both the house martins that nested along the houses facing the Park and the many bats that roosted in the Park and in the New River tunnel off Station Road.

The draft Area Action Plan for Wood Green now proposes that these former filter beds should be designated for a medium rise housing development for 304 units, in line with previous requests from Thames Water, the owner of the site, for the revocation of the MOL designation. If this is followed through, then I suggest that at least 50% of the site should be set aside for habitat creation to reflect the rich resource it provided in the past. This would compensate in part for the impact on visual amenity that would be created by building housing several storeys high on the remainder of the site.

However, the site requirements for these former filter beds state in their very first paragraph that "Development will need to be consistent with green belt policy, i.e. it should not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development (Para 89 of NPPF)". It is very difficult to see how building medium-rise housing on what is currently open or low-rise land can avoid having an impact (large or small) on the openness of the Green Belt.

Joseph Nicholas