

# London Borough of Haringey Local Plan

## Representation on Site Allocations Development Plan Document Preferred Options Consultation

March 2015

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# Introduction

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- 1.1 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 (DPD) Preferred Options consultation.
- 1.2 Kennet Properties is a subsidiary development company within the Thames Water Group. Its remit is to identify land that is surplus, or could become surplus, to the operational requirements of Thames Water Utilities Limited and to promote it for alternative use.
- 1.3 The London Borough of Haringey commenced preparation of their Site Allocations 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.
- 1.4 In January 2014 Haringey published their Site Allocations 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.
- 1.5 The current Site Allocations DPD identifies the site as site SA48, Hornsey Water Treatment Works (WTW). The proposed site allocation does not include the whole WTW site but only the southern two filter beds, as identified by the location plan in Appendix 1. For clarity the site is therefore referred to within this consultation response as Hornsey Filter Beds.
- 1.6 Kennet Properties Ltd continue to maintain that the Hornsey Filter Beds are suitable for residential use. In response to the current consultation stage for the Site and Allocations DPD these representations:
  - review housing need in Greater London and specifically the London Borough of Haringey
  - review the proposed site and its surroundings;
  - present a case for the need to redefine the Metropolitan Open Land boundary; and
  - address some additional considerations including a new proposed footpath through Hornsey WTW and concerns with Odour.

# Housing Need in Greater London and Haringey

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## Housing need in Greater London

- 2.1 In 2013 The Department for Communities and Local Government (DCLG) and Greater London Authority (GLA) released official housing statistics through the London Strategic Housing Market Assessment (SHMA) which revealed that London's housing need was greater than was thought.
- 2.2 It showed that London's population has grown more over the last ten years than at any time in the capitals history and that housing supply has not kept up with this growing demand.
- 2.3 With the capitals population expected to reach nine million by 2020, current housing supply levels suggest that there will be a deficit of 559,000 homes by 2021.
- 2.4 In order to be able to keep up with this demand, and to address the current deficit, 809,000 homes need to be built in London by 2021.

## Housing Need in the London Borough of Haringey

- 2.5 The GLA's 2013 mid-year population estimates, which remain the most up-to-date projections available, estimates that the London Borough of Haringey's population stood at 262,797 in 2013 and it is expected to grow to 293,748 people by 2026.
- 2.6 In order to meet this additional need the GLA in their Further Alteration to the London Plan (FALP) (2015) document set a challenging housing target for the Borough. Over the Plan period 2011 – 2026 they are required to deliver 19,802 new additional homes. This equates to 1,502 new homes per annum.
- 2.7 The Council has prepared the Tottenham Area Action Plan and the Site Allocations DPD which had identified sites for only 18,656 net additional dwellings. The Council is there not yet able to demonstrate that it can meet its full housing requirement and as a consequence it is imperative that those site suggested for allocation are carried forward to adoption.

## How can Hornsey Filter Beds contribute to Haringey's Housing Target

- 2.8 The Hornsey Filter Beds site will help to address the housing need in Haringey by delivering approximately 40 units, on a site which has been previously developed, is in a sustainable location and is well related to the existing residential neighborhood.

## The Site and its Surroundings

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- 3.1. Hornsey Water Treatment Works (WTW) is located immediately west of the East Coast Main Line Railway, south and east of Alexandra Park, north of Newlands Road, the Campsbourne Estate and the New River Village.
- 3.2. The water works contain 4 concrete lined filter beds, a new water treatment facility and a open storage reservoir to the north of the site. The site proposed for allocation consists of the two most southern filter beds which sit adjacent to Newlands Road.
- 3.3. Alexandra Park, just to the north-west of the site, is a public recreation space. It is designated a Site of Borough Grade I Importance for Nature Conservation, and a Historic Park. Both the park and the water works, including the filter bed site, are designated Metropolitan Open Land (MOL).
- 3.4. To the south of the site beyond Newlands Road and to the east of the site beyond the East Coast Main Line Railway are existing built up areas consisting of both residential houses and apartments and other industrial and commercial uses.
- 3.5. The Penstock footpath is a pedestrian and cycle link connecting Wood Green and Haringey Heartlands with Hornsey and Alexandra Park. It turns off Newlands Road at the southern edge of the site, runs east along the edge of the New River, then turns north beside the New River, before passing under the railway in a short underpass. At no point does the footpath cross through the WTW site.

# The Case for Metropolitan Open Land Review

- 4.1 Due to the challenging housing targets set by the GLA and the capacity constraints experienced by the London Borough of Haringey, it is considered necessary for the London Borough of Haringey and the GLA review the Metropolitan Open Land (MOL) designation at the Hornsey Filter Beds.
- 4.2 The Hornsey Filter Beds site is currently designated as MOL. This designation was included as part of the previous statutory plan for the Borough – the Unitary Development Plan – which was adopted on 1 November 2006.



Figure 1- Hornsey WTW and the MOL designation boundary

- 4.3 In November 2006 permission was granted for the erection of a new water treatment works comprising of four new buildings. Prior to this development the WTW site was considerably more open. The development of the buildings in the center of the site separates the large MOL designation which extends through Alexandra Park and Palace and the proposed allocation of the filter beds.
- 4.4 The decision notice for the new works stated that:
- “The proposals are inappropriate development within the Metropolitan Open and (Policies OS2 Metropolitan Open Land, OS4 Alexandra Palace and Park) and some harm would be caused to the open character of the land...”*
- 4.5 Due to the introduction of the new WTW at the site and the consequential notable change to the open character of the site, it is considered that a review of the MOL designation at this location is warranted. The London Plan in Policy 7.17 states that any alterations to the

boundary of the MOL should be undertaken by Boroughs through the LDF process, in consultation with the Mayor and adjoining authorities. In the context of the pressing need to increase the supply of housing in Haringey it is considered an appropriate time for this review.

- 4.6 Policy 7.17 of the London Plan goes on to state that land designated as MOL should satisfy one or more of the following criteria:
- Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area;
  - Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London;
  - Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level;
  - Land that forms part of a Green Chain and meets one of the above criteria.
- 4.7 Therefore in order to establish whether or not the Hornsey Filter Bed site should be removed from the MOL the site needs to be assessed against the above.

#### **Case for the removal of Hornsey Filter Beds from the MOL**

Land that contributes to the physical structure of London by being clearly distinguishable from the built-up area

- 4.8 Hornsey 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.
- 4.9 The wider MOL designation includes Alexander Palace and Park. The proposed Filter Beds site is separated from the Palace and Park by these large operational buildings resulting in there being an disconnection between the proposed site and the wider MOL designation.
- 4.10 The proposed filter beds site sits adjacent to the residential estate of Campsbourne to the south. Due to the site having an existing urbanised character and its location next to an existing built up area the site is considered to be further disconnected from the wider MOL, and better related to the surrounding residential neighborhood.
- 4.11 The proposed allocated site cannot therefore be clearly distinguished from the built up area and therefore does not contribute towards the physical structure of London.

Land that includes open air facilities, especially for leisure, recreation, sport, arts and cultural activities and tourism which serve the whole or significant parts of London

- 4.12 The proposed filter bed site as described above is wholly made up hard standing. The site does not currently provide open air facilities of any description as it is an operational works. For health and safety reasons it is not (and has never been) accessible by the general public. Its operational use also makes it unsuitable as a site for leisure, recreation, sport, arts or cultural activities use.
- 4.13 Should the site be removed from the MOL there will be no net loss of open land as the site

does not currently provide open public space.

Land that contains features or landscapes of historic, recreational, nature conservation or habitat interest, of value at a metropolitan or national level.

- 4.14 The filter beds and other structures on the site are locally listed. A request was made to English Heritage to list the whole site including the filter beds. English heritage have produced their factual report which assesses the site historical significance. Thames Water instructed Montagu Evans to review this report and respond on their behalf.
- 4.15 Their response to the report, which is submitted in full in support of these representations, concludes that the site and associated Sluice House do not have the requisite special interest to warrant inclusion on the Secretary of State's list of buildings as per s.1(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. As such it is considered that the site does not contain features of historical value.
- 4.16 The site is located within a conservation area. Any future development on the site, will need to respect and enhance the character of the conservation area, and mitigate against any potential impacts. Given the distance to Alexandra Palace and the presence of the water treatment works in between it is not considered that redevelopment of the filter beds will ultimately be harmful to the Conservation Area.

Land that forms part of a Green Chain and meets one of the above criteria

- 4.17 The London Plan 2013 defines Green Chains as:
- 'areas of linked but separate open spaces and the footpaths between them. They are accessible to the public and provide way-marked paths and other pedestrian cycle routes.'*
- 4.18 The site at present would not be considered to form part of a Green Chain as the site is not assessable by the public. It also has a developed character and does not represent an area of open space.
- 4.19 Should the site come forward by way of an allocation any proposed development will improve the current accessibility and Green Chain by providing access through the site to the Alexander Park and Palace.

Summary of the case for removal from the MOL

- 4.20 As demonstrated it is considered that the proposed Hornsey Filter Bed site no longer satisfy's the London Plan criteria as land which should be designated MOL. As such the proposed alteration of the MOL boundary is therefore acceptable at this location.



## Other Considerations

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### Footpaths

- 5.1 The Council have expressed a desire for Thames Water to provide access across their site in order to create a more direct route from the New River Path Subway to the Alexander Park. Unfortunately Thames Water are unable to grant access across an operational site due to health and safety issues.
- 5.2 As mentioned above any proposed development at the site could provide a better link between the Newlands Road the Alexander Park and Palace by way of a public footpath through the development.

### Odour

- 5.3 The proposed allocation will result in residential dwellings being located in close proximity to an operational works. As the works are a Water Treatment Works there is no concerns with regards to Odour.

### Reinvestment into infrastructure

- 5.4 Thames Water regularly identifies surplus land which can be sold for other uses. Thames Water Utilities Regulator OFWAT monitors and reviews all non regulatory business to ensure that all profits are invested back into the regulatory business. As such any profit made from development and subsequent sale of the site will be re invested into Thames Waters existing infrastructure.

## Summary and Conclusions

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- 6.1 Kennet Properties Ltd would like to support the allocation of the Hornsey Filter Beds site within the Haringey Sites and Allocations DPD.
- 6.2 The proposed site is previously developed land, in a sustainable location, well related to the existing residential neighbourhood and if allocated would contribute to Haringey meeting their housing target.
- 6.3 The site is currently designated MOL, and as such in order to be brought forward would require the existing MOL boundary to be redefined. The above analysis has demonstrated that the site no longer satisfy's the London Plan's criteria as land which should be designated MOL, and as such it is considered that through the Site Allocations DPD process the boundary reviewed.
- 6.4 Should the site be allocated Kennet Properties will continue to work with Thames Water Utilities Ltd to ensure the timely release of the site and to resolve any infrastructure concerns they may currently have.

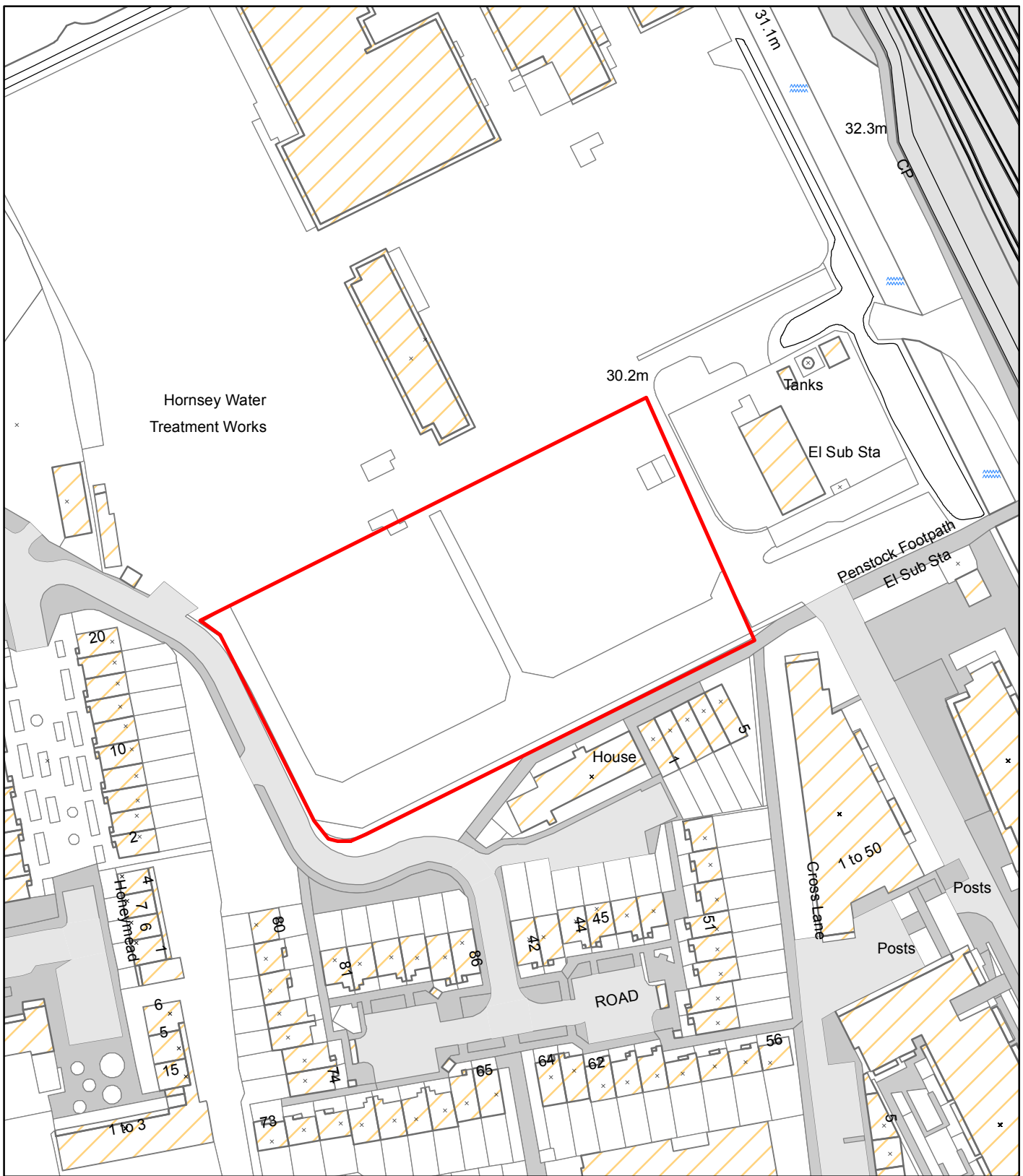
# Appendix 1

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Hornsey Filter Beds location Plan



# Hornsey Filter Beds



**Thames Water Map**

Printed By : CCOLLOFF  
 Print Date : 01/05/2013  
 Map Tile Name: 55922

0 5 10 20 30 40  
 Meters  
 Current Scale : 1:1,250



Comments:

Proposed Housing Site —

**Disclaimer:** The position of any boundary or apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed. No liability of any kind whatsoever is accepted by Thames Water for any error or omission.

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