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LDF Responses



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Dear Sir / Madam

HARINGEY – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)

We are writing on behalf of our client Kennet Properties Limited in relation to the above document.

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 beneficial alternative use.

We have the following comments on the consultation document:

Proposed Site Allocations

HO2: Hornsey Water Treatment Works

Kennet Properties supports the allocation of this site for future residential use. The two specific filter beds identified as part of the site allocation are expected to become available for development during the lifetime of the Site Allocations Development Plan Document and it is considered that if released from operational use, then a residential development is most appropriate.

The site is currently designated as Metropolitan Open Land (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. Since this time, there have been important changes at the site which now warrants a review of the MOL designation in this location as part of the Site Allocations DPD.

In November 2006 planning permission was granted for the erection of pre-treatment and bromate facility comprising four new buildings on the Water Treatment Works. As the decision notice recognised:

“The proposals are inappropriate development within the Metropolitan Open Land (Policies OS2 Metropolitan Open Land, OS4 Alexandra Palace and Park) and some harm would be caused to the open character of the land...”

The buildings are located centrally within the Hornsey Water Treatment Plant and therefore provide a large, permanent, physical built form that separates the large MOL designation to north and west (which extends through to Alexandra Park and Palace), and the small remainder of the MOL designation to the south.

The only MOL designation to the south of the pre-treatment and bromate facility is the remainder of Thames Water's operational land – the two filter beds proposed for residential development as part of allocation HO2 and Thames Water's Operational Buildings at the south east corner of Hornsey WTW. Consequently it can be seen that since the completion of the operational buildings for bromate facilities and pre-treatment at the WTW, there has been a fundamental change to the openness of the land that forms the southern extent of the current MOL designation and the way it relates to the MOL designation to the north.

The London Plan sets out that any alterations to the boundary of MOL should be undertaken by Boroughs through the DPD process, in consultation with the Mayor and adjoining authorities. 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.

It is therefore appropriate for the Site Allocations DPD to consider whether a review of MOL is warranted. Given the significant change that has taken place since the MOL designation was made as part of the UDP, it is Kennet Properties view that a review of MOL is warranted.

The site HO2 is now encircled by built form on all sides. Whilst the filter beds within the HO2 draft allocation remain open in appearance, they no longer form an uninterrupted relationship to the wider MOL designation. As a consequence they are no longer clearly distinguishable from the built-up area. Consequently, it is Kennet Properties view that the area identified in draft allocation no longer meets the criteria for MOL.

Alongside the physical changes that have occurred on-site, there are emerging policy changes. Currently the London Plan sets a housing target for Haringey of 8,200 new dwellings to be completed between 2011 and 2021. This equates to 820 dwellings a year and was the policy in place when Haringey Council adopted its Local Plan: Strategic Policies Document. Further Alterations on the London Plan are currently out for consultation proposing new housing targets for the 10 years between 2015 and 2025. For Haringey the proposed revised target is 15,019 dwellings in total, which equates to 1,502 dwellings per annum. This equates to almost a doubling of the housing numbers for the Borough for which the Site Allocations DPD may have to identify suitable housing sites.

In this context Kennet Properties considers it appropriate for a review of the suitability of the current MOL designation to be undertaken. Site HO2 is well related to existing residential development and is approximately 250m north of Hornsey High Street with a good range of shops and facilities. The site is therefore in a sustainable location to contribute to achieving the housing requirements for the Borough.

I trust the above has satisfactorily outlined our client's support for the proposed allocation of site HO2 and the reasons why it is now appropriate to allocate the site for residential use. However, please do not hesitate to contact me if you have any queries.

Yours faithfully,

Alec Arrol BSc (Hons), MSc, MRTPI
Associate Director Planning