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Dear Sir or Madam

**London Borough of Haringey: Wood Green Area Action Plan Preferred Option 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 (WTW), written in response to London Borough of Haringey's consultation on its Wood Green Area Action Plan (WGAAP) Preferred Option.

Kennet Properties Ltd 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 WGAAP provides an outstanding platform from which to maximise the opportunities available at Wood Green; most notably in regards to the anticipated provision of Crossrail 2 serving, and being served from, within the WGAAP area.

To take advantage of this opportunity, Kennet Properties Ltd supports the WGAAP's underlining theme of developing east-west connectivity and, specifically, overcoming the current constraint of the East Coast Mainline in this regard. Such connectivity would increase the potential catchment of the area and provide for further opportunities to maximise the benefits arising from further enhanced strategic infrastructure. The Haringey Heartlands is identified within the Local Plan (2013 – 2026) as incorporating both sides of the East Coast Mainline; the WGAAP provides an opportunity for consideration of the character development opportunities of that land to the west of the East Coast Mainline, incorporating the WTW site.

Whilst also allowing for this strategic opportunity to enhance east-west linkages, further opportunities are available to provide enhanced connections to Alexandra Park and its large open space, culture and leisure facilities. Within the park, plans to restore Alexandra Palace are continuing with the council having secured approximately £19 million from the Heritage Lottery Fund, providing further benefits to enhancing east-west connectivity and specific access to Alexandra Palace and Park.

**Hornsey Water Treatment Works**

The Kennet Properties site is split into two key areas. The northern part of the site accommodates an open storage reservoir and the southern end of the site contains operational works. The area covered by the operational works is wholly made up of hard standing, storage beds and 4 large operational buildings standing 44.70 meters high.



## **Hornsey Water Treatment Works Local Plan Promotion Background**

The London Borough of Haringey (LBH) commenced preparation of its 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 bed site which comprises of an area of 0.7 ha in size and forms part of the wider Water Treatment Works.

In January 2014 LBH published its DPD Regulation 18 consultation within which the filter bed site was identified as site HO2. Kennet Properties Ltd responded to this consultation supporting the allocation.

The Regulation 18 DPD consultation in March 2015 identified the site as site SA48. The proposed site allocation referred to the site as Hornsey Water Treatment Works but did not include the whole WTW site but only the southern two filter beds.

Alongside representation to the LBH Site Allocation DPD consultation LBH published the WGAAP Issues and Options document for consultation, between 8 February and 20 March 2016, representing the very first stage in the WGAAP's production. Savills again on behalf of Kennet Properties Ltd submitted representations in support of the allocation of the WTW site, providing further background as to the site's development opportunity and its planning context; these representations have been enclosed for ease of reference.

## **Wood Green Area Action Plan Preferred Option Consultation**

As noted above, Kennet Properties Ltd continues to maintain that the Hornsey Filter Beds site is suitable for residential use and therefore supports proposed allocation WG SA 25 (Hornsey Filter Beds) for residential.

### Land Release and Development Quantum

Kennet Properties Ltd agrees with the Commentary to this proposed Allocation which notes that the Hornsey Filter Beds site *'offers a unique opportunity to improve connections between Wood Green and Alexandra Palace and Park.'* As noted within the previous DPD and WGAAP representations, the site currently remains an operational Thames Water site, with no opportunity for public access through the site. Whilst the site remains operational, Thames Water has identified site and network upgrades which could facilitate the release and delivery of the site for development during the Plan period. Such work would have to be funded through the revenue generated by the redevelopment of the site, as it is not otherwise work that Thames Water would plan to do for operational reasons. However, this work would enable infrastructure to be relocated / decommissioned which would allow the desired connectivity improvements between Wood Green and Alexandra Palace and Park.

To achieve this, a reasonable amount of development will be required. Allocation WG SA 25 (Hornsey Filter Beds) currently provides a single indicative development capacity. It is considered that it would instead be more appropriate to attribute an indicative range of development capacity, which provides greater scope for optimising the site subject to detailed design. The London Plan density matrix suggests that for a site within PTAL 4 in an Urban area, the density should be in the range 45-260 dwellings per hectare, suggesting a range of between 153 and 884 units upon this 3.4ha site; this is a very broad range and it is considered that a more sensible range would be between 250 and 350 units.

### Metropolitan Open Land

The WTW site is located within the Metropolitan Open Land (MOL). The wider MOL designation includes Alexander Palace and Park and the proposed site is separated from the Palace and Park by the 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 MOL purpose, as considered below.

Kennet Properties Ltd notes that the Site Requirements supporting text of the Allocation seeks to ensure that future development is consistent with green belt policy, as an example in relation to having no greater impact on the openness of the MOL. The Hornsey Filter Beds site is currently considered to be an open site, hosting filter beds rather than buildings, and a stringent approach to the protection of, amongst other characteristics, the openness of the site would restrict the development potential of the unique opportunity to secure and improve connections between Wood Green and Alexandra Park (which is dependent on the full release from operation of the site). Sensitive detailed design, including landscaping, of the site on a comprehensive basis as part of a future planning application, will be capable of addressing any concerns as to future development impacts on the MOL, without unnecessarily restricting the development potential of the site. The operational works at the site constitute hard standing, storage beds 4 large operational buildings standing 44.70 metres high; against this baseline residential development can be accommodated at the proposed allocation site without any significant additional adverse effects.

It is noted that the Commentary to the Allocation confirms that *'it is considered that some of the existing uses on the site contribute detrimentally to the aspirations of these designations [MOL and local listing designations]. It may be that a development on this site can be beneficial to meeting these aims, as well as offering the potential to complement the nature conservation designation on the adjacent reservoir.'* This analysis confirms our assessment of the site and its context and is supported.

#### Housing Mix

The Development Guidelines supporting text of the Allocation confirms consideration that the site is located within an area generally more suitable for family housing. Kennet Properties Ltd accept this preference for family units and the future development of the site will also be considered within the context of regional and local planning policies' emphasis on the establishment of mixed communities through a mix of unit sizes and tenures and having regard to the financial viability of the scheme. It is likely that a proportion of one and two bedroom units will be required to ensure that the scheme is viable.

#### Heritage Impact

The setting of Alexandra Palace does not preclude development of the subject site, being some distance from the site, having consideration of the substantial level differentials between the Palace and the site and being disconnected from the Palace by, most immediately, an open storage reservoir. Similarly Alexandra Park does not preclude the redevelopment of the WTW and instead provides part of the baseline context against which development proposals should be considered.

#### 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 beneficial public access.

#### **Conclusion**

In conclusion, Kennet Properties Ltd welcomes the identification of the Hornsey Filter Beds site as suitable for residential redevelopment, and in turn taking full advantage of the associated unique opportunity for improved connections between Wood Green and Alexandra Palace and Park.

Should you require any further information, please do not hesitate to contact me.

Yours faithfully



Adam Wadsworth  
Senior Planner