



Representation on behalf of Kennet Properties Ltd

Matter 2 / Issue 4

Respondent 55

**London Borough of Haringey: Site Allocations Development Plan Document
Inspector's Draft Matters and Issues for Examination**

Matter 2: *General Issues for Development Sites*

Issue 4: *Is the amount of deliverable land allocated for housing sufficient to meet the needs of the borough over 2016 –2020 and the years 2021 - 2026? If not, how will the plan ensure that an appropriate housing land supply will be maintained?*

Soundness

In order to consider whether a DPD is Sound, reference needs to be made to the National Planning Policy Framework (NPPF), Paragraph 182. This identifies 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 SADPD Pre-Submission version is not Sound as it does not adequately seek to meet objectively assessed housing requirements as set out in the London Plan (2015) and echoed within the Alterations to Strategic Policies Regulation 19 document (January 2016) and on this basis is therefore not Positively Prepared.

General Comments

These representations are made on behalf of Kennet Properties Ltd in relation to land at Hornsey Water Treatment Works (WTW), hereafter referred to as 'the site'. They are in response to London Borough of Haringey's consultation on their Site Allocation Development Plan Document (SADPD) – Inspectors Draft Matters and Issues for Examination consultation.

In January 2014 Haringey published their SADPD Issues and Options consultation within which the Hornsey Filter Beds site (southern beds only) was identified as site HO2. Kennet Properties Ltd responded to this consultation supporting the allocation.

The Preferred Options Site Allocation Development Plan Document (SADPD) was published in February 2015 and retained the allocation of the southern part of the site for redevelopment for residential dwellings (site SA48). Kennet Properties Ltd continued to maintain that the whole site was suitable for residential development and that the two southern filter beds could come forward followed by the remainder of the site.

The pre-submission version of the DPD was published in January 2016 and no part of the site was allocated for residential development within this document.

The Council's justification for the non-allocation (as set out in the Regulation 22 Statement of Consultation Pre-Submission) was as follows:

"The Council have identified sufficient sites to meet the objectively identified housing need, and London Plan housing target. This has been achieved without needing to develop MOL within the borough.

It is noted that this site was included in earlier versions of the document, but was removed after consultation responses, including from the GLA, who formally designated for Metropolitan Open Land, raised objection to its inclusion. It is considered that in order for a reallocation of MOL at any point in the future, that in addition to the case being made that the land itself does not provide a MOL-appropriate use, there would need to be significant strategic benefit gained through the rezoning (above and beyond simply housing need, which has demonstrably been met on non-MOL sites), and will make a positive benefit to the surrounding MOL, Conservation Area, and other surrounding uses."

In respect of Matter 2 Issue 4 we are concerned that the plan as drafted does not allocate sufficient sites to meet the needs of the borough over 2016-2020 and the years 2021-2026 and that unrealistic assumptions have been made in relation to the future supply of housing (for example in respect of windfalls). The plan as drafted does not have any flexibility in the event that certain sites do not come forward. The plan should be seeking to exceed the housing targets, in line with the London Plan, and not just meeting them.

For the reasons set out below we do not believe that the omission of this site is justified or effective and consider that the plan does not meet the tests of soundness set out in the NPPF.

Housing Provision

To meet the housing targets against objectively assessed housing need within the London Borough of Haringey (LBH), Table 3.1 of the London Plan outlines a minimum ten year target between 2015-2025 of 15,019 net additional dwellings (an annual monitoring target of 1,502). Alterations to the LBH Strategic Policies Document (January 2016) propose the strategic housing requirement of 19,802 homes over the plan period from 2011- 2026, to echo the provisions of the London Plan, and seek to maximise the supply of additional housing to meet and exceed this target.

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. The number of windfall sites is expected to come forward on unallocated sites at an average rate of 200 net units per annum, which equates to 3,000 homes over the plan period.

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 and with the current reliance in windfall sites the plan is inconsistent with National Policy. Given the time passed between the Unitary Development Plan (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.

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.

Within our previously submitted representations we noted that as accepted in paragraph 4.10 of the SADPD the inclusion of a Windfall Development Allowance should not be counted against the anticipated delivery against the minimum housing provision target. It was also noted that the Council have not been able to demonstrate a reliable source of windfall sites coming forward to provide a reliable source of supply. The Council failed to respond to these comments.

For these reasons, it is considered that a Windfall Development Allowance against the minimum target is not appropriate and not justified 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. As a result the plan should be regarded as unsound.

It is also considered that the SADPD evidence base is out dated which results in the housing numbers within the plan being unjustified. An example of this is the 2013 Strategic Housing Land Availability Assessment (SHLAA). It is considered that the SADPD should be based on evidence which is up to date and that a review of the SHLAA should have been undertaken.

Furthermore, we do not think that the Council's reason for removing the site's allocation is reasonable or justified. It is accepted that the site is within the MOL, however, it is a previously developed site and as such the policies in the NPPF in respect of Green Belt apply. The NPPF (paragraph 89) allows the limited infilling and partial or complete redevelopment of previously developed sites, whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. This is notwithstanding our view that the site no longer serves the purposes of land in the MOL.

The allocation of the site as MOL is assessed in more detail in earlier representations submitted, on behalf of Kennet Properties Ltd, towards the Preferred Options Consultation of the SADPD. These representations make reference to the November 2006 decision notice for the erection of the water treatment works and associated buildings on site where it was considered that "*the proposals are inappropriate development within the Metropolitan Open Land...and some harm would be caused to the open character of the land*". This further reiterates that the openness of the MOL has been eroded and that its boundary should be reviewed as the site no longer satisfies the London Plan's criteria as land which should be designated as MOL.

The WTW is split into two key areas. To the north of the site there is an 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. The redevelopment of the Water Treatment Works site provides an excellent opportunity to help ensure the Council can meet (which at the very least it needs to do) its housing need in the borough and to redevelop a brownfield site which in its current use is out of character with its surroundings.

Prospects of Sites Coming Forward

It is considered that there are a number of sites within the SADPD, that due to site constraints, are unlikely to come forward over the plan period which result in the plan being in-effective. In addition there are significant objections have been raised during the consultation process to a number of allocations within the SADPD. One site which was substantially objected was the allocation of 72 – 96 Park Road & Lynton Road (site allocation reference: SA49) for 41 residential dwellings. The grounds for objection were based around: loss of employment floorspace; loss of open space; loss of a conservation asset; and the density of the proposed development. A key aspect of the development that is being objected against is the loss of the green space and trees at the corner of Lynton Road which is a well used area of green space for the local community.

For the reasons set out above, it is considered that the redevelopment of the Hornsey Water Treatment Works provides an opportunity to redevelop a site which is out of character with its surrounding and can benefit the wider community.



Summary

It is our view that additional sites need to be allocated within the SADPD to ensure that the Borough is able to meet its housing needs over the plan period.

We consider that the allocation of our client's site for housing will make good use of a site which is out of character with its surroundings and should no longer be allocated as MOL.

For the reasons set out above we consider the plan, as currently drafted, is unsound as it fails the tests set out in the NPPF. It is:

- Not positively prepared;
- Unjustified;
- Ineffective; and therefore
- Not consistent with national policy.

On behalf of Kennet Properties Ltd we would like to participate at the relevant Hearing Session during the Examination into the plan.