

Ms Mercy Oruwari
London Borough of Haringey
Planning Policy Team

Our ref: 000070

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Email: localplan@haringey.gov.uk

Dear Ms Oruwari

Wood Green Area Action Plan consultation (Preferred Options)

Thank you for consulting us on the preferred options consultation and allowing us an extension on the deadline to comment. We provided comments back in March 2016 on the issues and options consultation. Having reviewed the preferred options document we are disappointed that very little of the advice we gave last year has been incorporated into this version of the plan. Despite this we welcome the site allocations development guidelines as these cover environmental requirements for Source Protection Zones, flood risk and the Moselle Brook.

Although we appreciate there are policies in the Development Management Plan that address issues such as flood risk, Critical Drainage Areas and watercourses, we believe that an opportunity is being missed to interpret what is important locally for Wood Green to improve the natural environment and this is not reflected in vision statements, the figures/maps, objectives and the AAP policies themselves. We are concerned that the section 11 appraisal of the draft plan within the Sustainability Appraisal has not referred to evidence in the Thames River Basin Management Plan when appraising how effectively the plan addresses biodiversity and water resources in Wood Green. For example, paragraph 11.5.7 states that the green grid offers opportunities to deculvert and improve the ecological value of the waterways (particularly along the New River). The delivery of the green grid may have some positive effects but Policy WG8 Green Grid/New Urban Spaces bears no mention of how enhancing the waterways can contribute to the development of a green grid and improved ecology. We provided a comprehensive response on this at the last stage including the specific Water Framework Directive action measures for the Moselle Brook and New River.

Furthermore, there is the opportunity to promote sustainable drainage measures more strongly throughout this document to tackle poor water quality in the area. There is evidence to support this in the Thames River Basin Management Plan.

Were we recommend specific wording to be added we've included this as red text. Our specific comments are as follows:

Aims and objectives of this AAP (paragraph 1.8, p.7)

Although Wood Green is primarily an urban environment and potentially lacking obvious environmental interest, there is scope to enhance and improve the natural environment wherever possible. Without repeating our March 2016 comments (pages 1 and 2), there are two watercourses (Moselle and New River) and issues with water quality and surface water flood risk. In addition, open space deficiency and lack of connected green spaces were identified as key issues in the previous issues and options version. There are currently no objectives that

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seek to improve and enhance the natural environment in the AAP area. We recommend an objective is included which recognises the value of improving the natural environment in Wood Green whether this be by improving water quality and drainage via Sustainable Drainage Systems, deculverting and enhancing the Moselle Brook or maximizing green infrastructure in redevelopments.

Previous consultation comments: Environment and sustainability (paragraph 1.18, p. 9)

It wasn't clear how our previous comments had been taken on board when reading this paragraph. We made quite detailed comments on the Water Framework Directive status of the watercourses, water quality and surface water flood risk as key issues when considering the evidence in the Thames River Basin Management Plan (2015) and Surface Water Management Plan (2011).

Chapter 3: Portrait of the Area
Green Spaces and Waterways (paragraph 3.9, p. 18)

We welcome the reference to the culverted, Moselle Brook in paragraph 3.9. However we'd still like to see reference to the status of both watercourses under WFD (details in our previous response). We recommend this section refers to the risk of surface water flooding especially in the north of the area where there is a Critical Drainage Area.

SWOT for Wood Green North Sub-Area (p. 33)

This sub-area falls within a Critical Drainage Area (Group 4_010- Green Lanes, Wood Green) identified in your Surface Water Management Plan (2011). See our previous comments for definition but we think the evidence of potential surface water flood risk should be factored into the SWOT analysis both as a weakness and as an opportunity.

SWOT for Wood Green Central (p. 36)

We support reference to the opportunity to celebrate the Moselle Brook in SWOT analysis.

SWOT for Heartlands Area (p. 43)

We support reference to the opportunity to celebrate the Moselle Brook.

Chapter 4: Key Issues, Challenges and Drivers
Infrastructure (p. 52-53)

Locally-specific measures to alleviate the risk of surface water flood risk for the Critical Drainage Area (Group 4_010-Green Lanes, Wood Green) are identified in the SWMP (2011). These measures should be added as 'infrastructure' as the measures are likely to be beneficial for redevelopment/regeneration of the Wood Green North Sub-Area in addition to resolving existing surface water flooding issues for existing residents and businesses.

Chapter 5: Spatial Vision and Strategic Objectives
Vision (paragraph 5.1, p. 54)

Our comments on the introduction (Aims and objectives, p. 7) are mirrored here. The vision currently has no vision for improving the natural environment in the Wood Green area, when there are clear reasons and opportunities for doing so. The vision previously included a sentence about 'a green environment' which has disappeared in this version (why is this when lack of green spaces and connectivity has been recognized as a key issue?). The vision for Wood Green could be that it *will deliver a green environment, integrating green infrastructure and natural drainage measures into the urban fabric.*

Spatial Objectives: AAP Area (p. 54)

There needs to be a spatial objective that aims to deliver a more natural, greener environment in Wood Green that seeks to improve water quality. This could be expanded on with reference to the aspiration to enhance the Moselle Brook, promote sustainable drainage measures and green infrastructure throughout the area.

Figure 5.1: Key Diagram (p. 55)

The Moselle Brook should be included on the map if possible, even though it is underground. Its indicative route can be obtained by downloading our Water Framework Directive data from gov.uk.

The Critical Drainage Area affecting the northern part of the Wood Green North Sub-Area should also be shown on the map using the mapping and data provided in your SWMP (2011).

The New River is shown but it needs to be more clearly labelled.

Vision for Wood Green North (paragraph 5.3, p. 56)

The identification of a Critical Drainage Area should be reflected in the vision, so it is seen as a priority to not only tackle the existing issues of surface water ponding/flooding, but aim to achieve an improvement overall with new developments. We recommend the following sentence is added:

New development champions a sustainable approach to the risks of surface water flooding by using sustainable drainage measures and green infrastructure.

Figure 5.2: Wood Green North Sub-Area Key Diagram (p. 56)

The Critical Drainage Area affecting the northern part of the Wood Green North Sub-Area should also be shown on the map using the mapping and data provided in your SWMP (2011).

Vision for Heartlands (paragraph 5.6, p. 59)

We recommend the following is added to the vision to represent the opportunity to deculvert the Moselle Brook:

*Establishment of an improved cultural quarter, and the redevelopment of Clarendon gas works to create new homes, jobs, and open spaces **including the Moselle Brook.***

Figure 5.5: Heartlands Sub-Area Key Diagram (p. 59)

The Moselle Brook should be included on the map if possible, even though it is underground in culvert. Its indicative route can be obtained by downloading our Water Framework Directive data from gov.uk.

Infrastructure Improvements (paragraph 6.12, p. 63)

Although we welcome the inclusion of enhanced green links and new open space, other environmental infrastructure requirements have not been included relating to flood risk and Water Framework Directive.

The preferred option of measures to alleviate surface water flood risk for the Critical Drainage Area (Group 4_010-Green Lanes, Wood Green) hasn't been included (particularly relevant for Wood Green North on page 65). Page 51 of your Surface Water Management Plan details the preferred measures including installation of underground storage units beneath local roads and increasing the storage capacity in Woodside Park. Page 61 of the SWMP provides an initial indication of capital costs although further assessment would be required before establishing more detail on costs. Although the measures identified are to alleviate existing surface water

flood risk in the area, the measures are likely to benefit growth and development in the area (page 39 of the SWMP does acknowledge the CDA falls within the Wood Green growth area as well as Enfield's North Circular Area Action Plan).

There are Water Framework Directive action measures identified for both the Moselle Brook and New River which in 2015 confirmed they are currently achieving 'moderate' status, with the aim by 2017 to achieve 'good' status. These action measures were supplied to you with our March 2016 response as waterbody summary reports – for convenience we have attached them to this response. Some of the action measures identified for the Moselle include the following:

- Seek deculverting on the Moselle Brook where feasible
- Promote the use of SuDS through the planning process to mitigate the effects of urban runoff
- Rectify misconnections on the Moselle Brook

For the New River one action measure is identified to implement vegetation and invasive species management. We think that Water Framework Directive action measures should be identified as part of the environmental infrastructure that might be required for the Wood Green area. This could involve working in partnership with us and the River Lea Catchment Partnership (<http://www.riverleacatchment.org.uk/>).

For Haringey Heartlands (p. 66) a new publically accessible open space to be provided as part of the redeveloped Clarendon Rd gas works site is listed with reference to this being 'along the route of the culverted Moselle.' The deculverting of the Moselle Brook is identified as a mitigation measure in order to meet Water Framework Directive targets for the watercourse to achieve good ecological potential. We recommend the following text is added as follows:

*A new publically accessible open space will be provided at the heart of the redeveloped Clarendon Rd gas works site, along the route of the culverted Moselle. **The deculverting of the Moselle Brook to make this a feature of the open space with improved habitat enhancement will be a key aim.***

Figure 6.2 Map of Infrastructure Improvements (p. 63)

Enhanced green links hasn't been included on the legend (assuming this differs from the new open space which is the lighter green).

The map should also reflect other environmental infrastructure requirements noted above, including the surface water flood risk alleviation measures identified in the SWMP and Water Framework Directive enhancement measures.

Policy WG8: Green Grid/New Urban Spaces (p. 92)

Although we welcome a policy that aims to create an enhanced network of green links, there is a lack of recognition for the natural environment. Given the evidence from the Surface Water Management Plan, Strategic Flood Risk Assessment and Thames River Basin Management Plan, there are opportunities to push for a better natural environment in Wood Green with reduced flood risk, improved water quality and enhanced ecology. Water quality, the ecological status of the Moselle Brook and surface water flood risk in the north of the area are 'local' issues and therefore should be addressed within the Wood Green Area Action Plan with specific plans to tackle these through growth and redevelopment. There are linkages between improving the natural environment and drainage with other policy aims such as improving health and wellbeing, providing more accessible green space and mitigating and adapting to climate change.

We suggest that either Policy WG8 is expanded in scope to include policy aims for the natural environment of Wood Green or the creation of a separate policy. The policy should as a minimum include the following aims:

- De-culverting of the Moselle Brook and ecological enhancement of both the Moselle and

New River, recognising the importance these have in providing green corridors, contributing to a green infrastructure network (i.e. Wood Green's green grid) and meeting WFD objectives;

- Sustainable drainage systems are a priority for Wood Green and should be strongly promoted throughout to reduce surface water runoff, mitigate for urban runoff and improve water quality entering the drainage network and create habitat; and
- Retrofitting sustainable drainage measures to mitigate for the existing surface water flooding issues identified in Wood Green north (Critical Drainage Area) are addressed as part of redevelopment wherever possible.

Plumbing misconnections are a particular issue for Haringey and affect the water quality of the Moselle Brook. Rectifying misconnections is identified as a WFD action for the Moselle Brook and should be a policy aim in this document, in terms of tackling existing misconnections and ensuring new developments are connected correctly.

Policy WG9: Community Infrastructure (p. 95)

Our previous comments on the section about 'Infrastructure Improvements' are relevant to this policy. We think there needs to be a policy aim on environmental infrastructure such as WFD actions for the New River or Moselle Brook and surface water flood alleviation measures for the north of Wood Green in relation to its status as a Critical Drainage Area in the SWMP.

Chapter 8: Site Allocations

WG SA 1: LBH Civic Centre

The site lies within groundwater Source Protection Zones 1 and 2. We may have commented previously on this site allocation in response to the Site Allocations DPD. We support the development guidelines included on investigation and remediation of contaminated land to protect groundwater quality.

The Civic Centre is within a Critical Drainage Area (Group 4_010-Green Lanes, Wood Green) according to your SWMP (2011). This should be identified within the development guidelines in addition to the fact the site lies in Flood Zone 1 and will require a Flood Risk Assessment.

WG SA 2: Green Ridings House

The site lies within groundwater Source Protection Zone 1. We commented on this site previously in response to the Site Allocations DPD. We support the development guidelines included on investigation and remediation of contaminated land to protect groundwater quality.

WG SA 3: Wood Green Bus Garage

The site lies within groundwater Source Protection Zone 1. We commented on this site previously in response to the Site Allocations DPD. We support the development guidelines included on investigation and remediation of contaminated land to protect groundwater quality.

WG SA 5: Vue Cinema

The site lies within groundwater Source Protection Zone 1. The sites current uses and history may not be a cause for concern in terms of potential land contamination issues, nevertheless there should be a development guideline similar to SA 4 stating:

The site lies in a Source Protection Zone as therefore any development should consider this receptor in any studies undertaken.

WG SA 6: Mecca Bingo

The culverted Moselle Brook is in a poor condition and as you acknowledge runs along the south edge of the site. We support the following site requirement you have included as follows:

The Moselle runs in a culvert along the south edge of the site, and investigations around it's suitability for future use, and potential deculverting should be facilitated through any development.

We recommend an additional sentence to this requirement as follows:

An eight metre buffer zone should be provided wherever possible.

Please note this requirement of an eight metre buffer zone will be beneficial in terms of providing a linear green corridor where the Moselle has been deculverted. However it should still be provided regardless as it ensures that future deculverting/enhancement works can be carried out and adequate access to the culvert can be maintained.

WG SA 8: Wood Green Library

We support the following development guideline:

The Moselle River runs in a culvert under this site, and has been identified as being in a potentially poor condition. Any development in this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is explored. It may be possible that a deculverted river could be a focal point for the new urban square.

We recommend an additional sentence to this requirement as follows:

An eight metre buffer zone should be provided wherever possible.

WG SA 9: Wood Green Town Centre West

This site has the Moselle Brook running through. Any development in this area should ensure as a minimum that the culvert is made safe and a suitable buffer zone is provided. The potential for the Moselle to be deculverted has not been considered/explored. The potential for deculverting should be considered within any Flood Risk Assessment for the site. This needs to be added to the development guidelines for the site.

We recommend an additional sentence to this requirement as follows:

An eight metre buffer zone should be provided wherever possible.

WG SA 10: The Mall (East)

We support the following in the development guidelines:

The Moselle River runs in a culvert under the north eastern corner of this site, and has been identified as being in a potentially poor condition. Any development in this area should ensure that as a minimum the culvert is made safe.

However, the potential for the Moselle to be deculverted has not been included in the text. The potential for deculverting should be considered/explored and assessed as part of any Flood Risk Assessment for the site. In addition, a suitable buffer zone should be provided.

We recommend an additional sentence to this requirement as follows:

An eight metre buffer zone should be provided wherever possible.

WG SA 11 Iceland

The site lies within groundwater Source Protection Zone 1 and therefore we support the following development guideline:

Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.

For consistency we recommend the sites position located in a Source Protection Zone is acknowledged.

In addition we support the following development guideline:

The Moselle River runs in a culvert under this site, and has been identified as being in a potentially poor condition. Any development in this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is explored.

We recommend an additional sentence to this requirement as follows:

An eight metre buffer zone should be provided wherever possible.

WG SA 12 – WG SA 14

We support the development guidelines highlighted for these sites.

WG SA 16: Coburg Road North

The fact that this site lies within a groundwater Source Protection Zone (SPZ1) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination.

WG SA 17: Bittern Place

The culverted Moselle Brook insects with this site. The development guidelines need to acknowledge this and propose that as a minimum the culvert is made safe, options for deculverting are explored and that an eight metre buffer zone should be provided wherever possible.

WG SA 18: Clarendon Road

You correctly acknowledge the Moselle River runs in a culvert under this site and provide the following development guideline:

The Moselle River runs in a culvert under this site, and has been identified as being in a potentially poor condition. Any development in this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is explored.

We do think there is the potential to deculvert the Moselle on this site. We'd like to see a stronger emphasis on the need to explore the potential for deculverting and to implement this. We recommend a change to the above text as follows:

The Moselle River runs in a culvert under this site, and has been identified as being in a potentially poor condition. Any development in this area should ensure that as a minimum the potential for deculverting the Moselle is explored and options to deculvert and are considered in the early design stages. An eight metre buffer zone should be provided wherever possible.

The fact that this site lies within a groundwater Source Protection Zone (SPZ1) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination. We like the wording used under WG SA 24: Clarendon Road South, expecting developments to demonstrate how they will improve local water quality.

WG SA 19: Wood Green Cultural Quarter

The fact that this site lies within a groundwater Source Protection Zone (SPZ1) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination.

WG SA 20: Wood Green Cultural Quarter North

The fact that this site lies within a groundwater Source Protection Zone (SPZ2) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination.

WG SA 22: Western Road Depot

The fact that this site lies within a groundwater Source Protection Zone (SPZ1) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination.

WG SA 23: Western Road Car Park

The fact that this site lies within a groundwater Source Protection Zone (SPZ1) should be acknowledged in the development guidelines to compliment what is already stated for investigating potential for contamination.

WG SA 24: Clarendon Rd South

As the site is in a groundwater Source Protection Zone (SPZ1) we welcome the following development guideline:

The site lies in a groundwater Source Protection Zone, and any development should demonstrate how it improves local water quality.

We suggest that this development guideline is repeated for other sites whether we've identified that there is a Source Protection Zone. As poor water quality is an issue in this area due to a range of factors (urban runoff, point source pollution such as misconnections and sewerage outfalls, lack of capacity in drainage network) we welcome the requirement that any development should demonstrate how it improves local water quality.

End note

We hope the comments above are useful as you progress the Wood Green AAP to the next stage. A meeting might be a good opportunity to talk through the comments we have made. We may be in touch with you soon to arrange this.

Yours sincerely

Keira Murphy
Planning Specialist
Sustainable Places, Hertfordshire & North London

Direct dial [REDACTED]
Direct e-mail HNLsustainablePlaces@environment-agency.gov.uk

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