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29th April 2024

Dear Sir/Madam

**London Borough of Haringey Planning Application Reference: HGY/2023/0850
139 Cranley Gardens, Hornsey, London, N10 3AG**

We act for the neighbouring owners of 137 Cranley Gardens. We are not certain that the LLFA has been consulted over this planning application, which is currently subject to a 14 Day reconsultation process ending shortly.

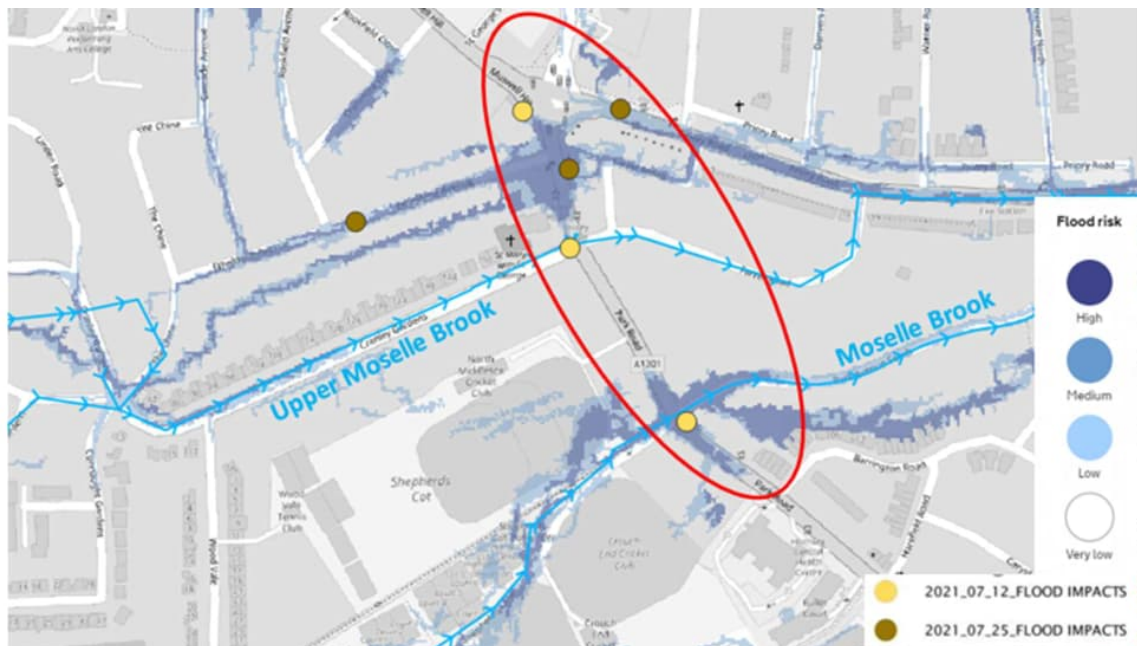
There have other consultation responses made on an apparently mistaken basis as to the correct facts.

An independent audit of the proposals has been made, but in regard to flood issues, the audit relies upon the development proposals requiring approval by the Local Lead Flood Authority (LLFA) and does not question the validity of the applicant's flood risk assessment itself.'

We are responding to the council setting out more clearly the details of how the development will potentially obstruct an overland flood route and exacerbate street flooding at Park Road as follows:

OBSTRUCTION OF OVERLAND FLOOD ROUTE

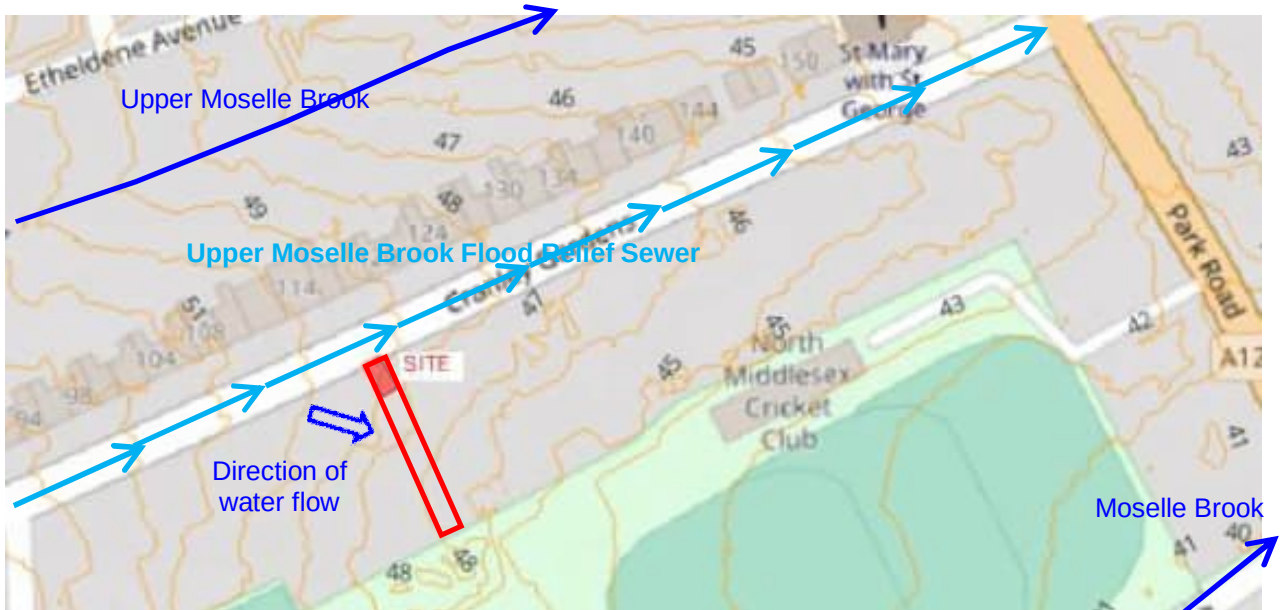
There has been a misinterpretation of a figure taken from the January 2022 Section 19 Flood Investigation Report for Park Road (North) by McCloy (reproduced below) and a suggestion that the Moselle Brook flowed along Cranley Gardens itself and had been culverted.



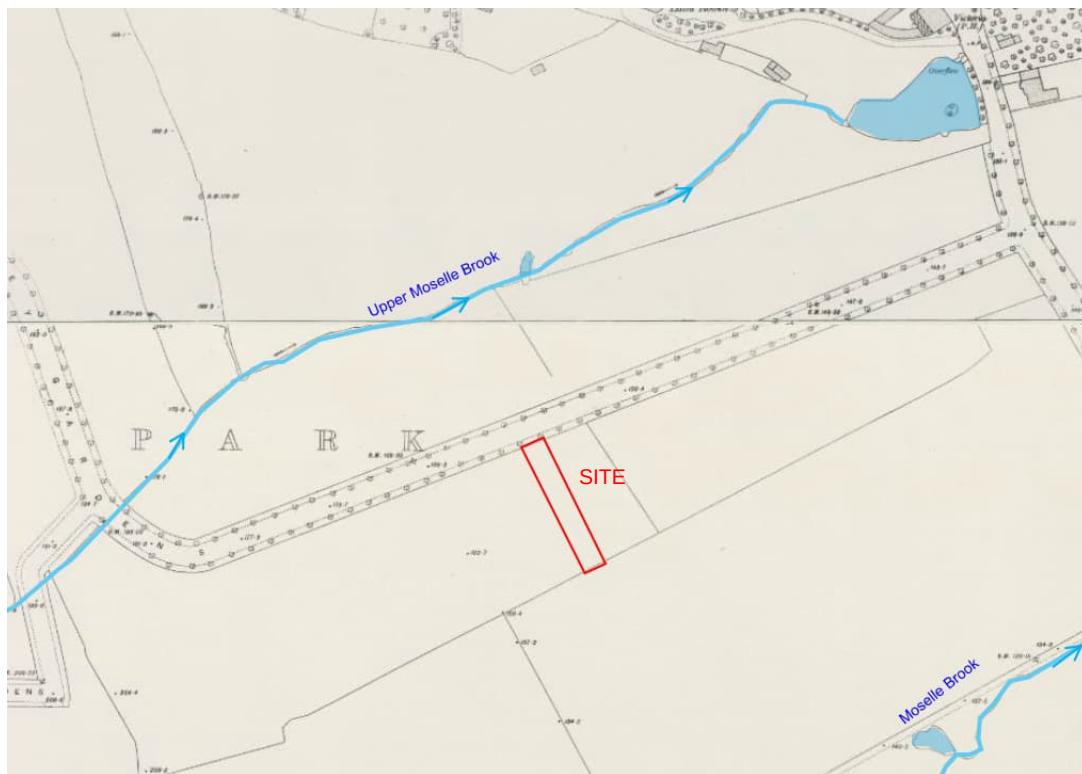
Extract of Fig 5-3 of January 2022 Section 19 Flood Investigation report (McCloy Consulting)

Cont'd

A cursory inspection of the topography of Cranley Gardens show that Cranley Gardens runs down an elevated spur that forms a watershed between two streams and it is a reflection of the quality and extent of the applicant's flood risk assessment that this has not been recognised. Instead the applicant introduces a proposal to introduce “**ground improvement across the site**” and recommends “**trial pits to be dug across the site and logged by a geotechnical engineer prior to any construction works.**” These proposals suggest a worrying lack of understanding of the site setting.



Annotated extract of Fig 4 of Flood Risk Assessment and SuDS report (Symmetrys)



Annotated extract of 19th Century Ordnance Survey plan showing the two streams

Cont'd

The BIA Audit noted that there is a flood risk generated from offsite flow routes heading down the Cranley Gardens carriageway and through the site towards the Cricket Ground to the south and required clarification from the applicant on this.

The applicant's response is to suggest altering the topography of the ground in order to prevent the overland run-off from entering the site, by means of an upstand or concrete speed hump.

Attention has been drawn previously to the apparent worrying lack of understanding by the applicant of hydrological matters and here we have the proposal to stop up the overland flood route without any consideration of the effect that this would have on the local environment outside the site.

The Flood Risk Assessment and SuDS report prepared by Symmetrys¹ quotes the Haringey Strategic Flood Risk Assessment (SFRA) as requiring development proposals to not increase the flood risk elsewhere.

As has already been pointed out in a previous consultation response, stopping up this flow would drive the flood water eastwards down Cranley Gardens towards the already high flood risk area around Park Road and will only exacerbate the flood risk in that area.

There is an obvious need to consider whether the benefits to an individual resident of the borough outweigh the risk of harm to the wider population of residents and business owners. The Haringey Development Management Policy DM24 is intended to manage and reduce flood risk through ensuring:

“A. The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding.”

“b Preserve overland flood and flow routes and ensure there is no net loss of flood storage.”

The DM24 guidance states that consideration should be given to the design and layout of development as this is particularly important in managing residual flood risks...but notes that the incorporation of special construction measures cannot amount to justification for development in inappropriate locations.

The Park Road area is reported to have regularly been the subject of historic flooding. The area flooded twice in July 2021 and there was a further event in August 2022. A major SuDS project has just been installed (2023) by at the Park Road/ Priory Road Junction in an endeavour to reduce the amount of flooding here.

The Flood Water Management Investment Plan (FWMIP) presented to cabinet on 12th March 2024 notes (para8.3) :

“Our parks and greenspaces provide the greatest opportunity for flood alleviation measures.”

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¹ Flood Risk and SuDS Assessment by Symmetrys 21066-SYM-XX-XX-RP-C-0001 Rev B 09/08/23

The Watercourse and Flood Risk Plan, adopted as part of the Council's Parks and Greenspaces Strategy, approved by Cabinet on 11th July 2023, clarified that

“To mitigate possible flooding within Haringey, measures need to be incorporated to remove surface water faster and to redirect it away from infrastructure. When these two actions can be combined it helps to reduce pressure on the current drainage systems. In open spaces there is the opportunity for water to be directed into the natural environment where it can be utilised for a variety of purposes.”

When consulted on development planning decisions, it may reasonably be assumed that the Haringey LLFA will seek to implement the above policies and will carefully consider the possible impact of any new development proposals within the catchments contributing to the areas of worst flooding.,

In this case the current overland flow routes that have been established by the Environment Agency are indicated to route across the property away from the Cranley Gardens carriageway and out of the



Extract of Environment Agency Flood Risk Mapping showing Surface Water overland flood route across the property

Upper Moselle catchment and down into the green area afforded by the Cricket Club, where some natural flow attenuation can be expected before the water enters the main Moselle Brook. Any interruption of that process that will simply work towards exacerbating the Park Road highways drainage /sewer flooding issue that have just had a lot of public money spent on mitigation.

Any flood flow across the property as indicated above will dissipate to some degree within the green space of the playing fields, whereas if this flow is to be diverted back onto the Cranley Gardens carriageway it will have no such opportunity and will simply add to the water that already collects at the Park Road/ Priory Road Junction.

In short, the applicant's submission has focussed upon dealing with the rain falling upon the site itself, but has not addressed the overland flows entering the site and appears to be counter-productive to the efforts being made to reduce flooding in the borough.

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We have asked that the planning department should consult with yourselves prior to making any planning determination regarding this development proposal.

Yours faithfully

Seamus Lefroy-Brooks

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