

# 2793 – 151 Shaftesbury Avenue, Response to LB Camden Drainage Officer Comments



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## **1. Introduction**

This report has been prepared by Heyne Tillett Steel (HTS) on behalf of Royal London Mutual Insurance Society Limited, in support of the planning application at 151 Shaftesbury Avenue, London WC2H 8AL.

This note provides a response to comments received from London Borough of Camden's (LBC's) Drainage Officer on the planning application, received via email dated 19.12.24, via DP9 Ltd, and subsequent discussions with LBC Case officer and DP9 Ltd.

## 2. HTS Response to Officer Comments

### 2.1 Major / Minor Development & Run-off Rates

HTS determine the definition of a major application is as defined in [The Town and Country Planning Order \(TTCPO\) 2015](#) which states:

*"major development" means development involving any one or more of the following:*

- a) the winning and working of minerals or the use of land for mineral-working deposits;*
- b) waste development;*
- c) the provision of dwellinghouses where—
  - ∥. the number of dwellinghouses to be provided is 10 or more; or*
  - ∥. the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (c)(a);**
- d) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more; or*
- e) development carried out on a site having an area of 1 hectare or more;*

A Flood Risk Assessment and Drainage strategy was submitted as part of the planning application. This includes details of the proposed drainage and SuDS strategy, referencing national, region, and local planning policy, including greenfield run-off rate requirements of the London Plan.

Opportunities have been maximised to reduce surface water run-off rates as far as possible within the constraints of the redevelopment.

Tables 5, 6, and 7 of the planning report summarise that SuDs have been accommodated in the form of blue and green roofs accommodated on upper roof and terrace which meet greenfield run-off rates for their respective catchment areas.

Maximising SuDs features achieves an overall betterment in surface water run-off of 38% from the site compared to existing greenfield run-off rates as targeted by the London Plan.

It is not feasible to provide further surface water attenuation across the scheme based on the following constraints:

- + Additional blue roofs on lower terraces are not feasible to be accommodated whilst maintaining step-free access to the terraces

- + Additional attenuation above the slab within the basement is not feasible due to the spatial requirements for other uses serving the site's needs – including provision of sprinkler tanks to upgrade the fire strategy.
- + Additional attenuation below the slab at basement level is unfeasible due to the presence of a 2.0m reinforced concrete raft foundation, unsuitable to be demolished to accommodate a tank within or below the foundation.

## **2.2 LBC Strategic Flood Risk Assessment 2024**

The Flood Risk Assessment and Drainage strategy submitted in support of the planning application had erroneously referred to the LBC Strategic Flood Risk Assessment (SFRA) 2014, not SFRA 2024.

A review of the SFRA 2024 report and mapping shows that the findings of the Flood Risk Assessment submitted for planning remains valid.

## **2.3 LBC SuDS Pro-Forma**

A completed SuDs pro-forma is provided in Appendix A, in accordance with the Flood Risk Assessment and Drainage Strategy, including greenfield run-off rates and their respective volumetric attenuation requirements.

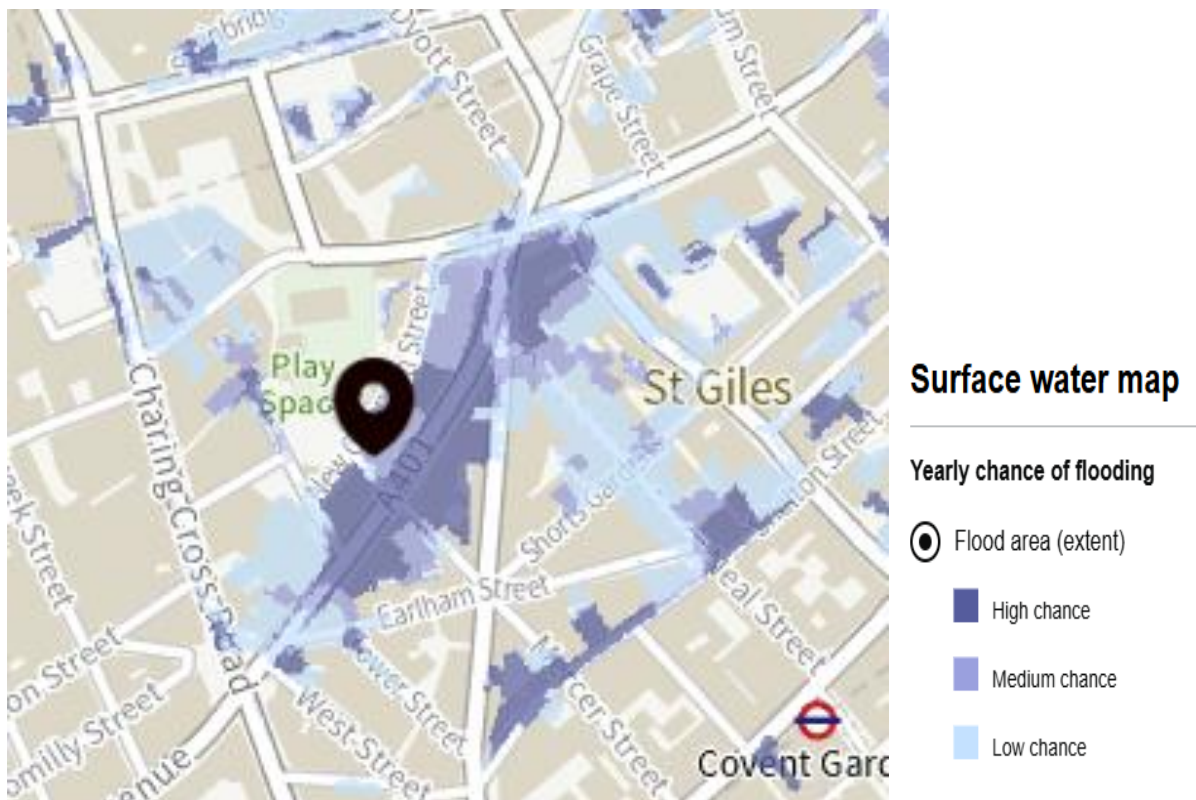
## **2.4 Surface Water Flood Risk**

The Flood Risk Assessment submitted in support of the application provided an assessment of surface water flood risk based on the available flood mapping data available at that time.

The proposed development involves an extension at roof level while retaining the ground floor arrangement as existing, therefore it is considered that the risk profile for the building itself remains largely unchanged.

Post-submission, and only very recently on 28<sup>th</sup> January 2025, the Environment Agency has released the New National Flood Risk Assessment (NaFRA) 'Risk of flooding from rivers and sea' and 'Risk of flooding from surface water' data.

An extract below in Image 1 shows the NaFRA surface water flood risk mapping at the proposed site's location.



**Image 1 – Environment Agency NaFRA2 Surface Water Flood Risk - 30.01.2025**

However, recognising the newly published data and the importance of ensuring appropriate mitigation measures are in place, particularly in relation to the basement and any plant equipment is acknowledged.

It is proposed that temporary flood barriers will be utilised as mitigation measures as part of a management system. The proposal is providing an improvement against the baseline position.

# Appendix A – LBC SuDs Proforma