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Our Ref: HLEC31922/001L

Email: alison.cadge@rpsgroup.com

Date: 15th January 2015

Federica Ambrosini
Senior Planner
Jones Lang LaSalle
30 Warwick Street
London
W1B 5NH

Dear Ms Ambrosini,

Re: Flood Risk Addendum – 113 Regent's Park Road, Camden (ref. 2014/7695/P)

RPS previously prepared a Flood Risk Report (ref. HLEC31922/002R) in relation to the conversion of the above site to residential use. Further to comments received from the Sustainability Officer regarding the flood risk issues at the site, this letter is intended to provide additional clarification regarding the flood risk to the development.

Surface water flood risk

The yard area to the rear of the property has been identified as at risk from surface water flooding, due to its topographic level below that of the surrounding land. Reference to the Environment Agency's online surface water flood risk mapping suggests a potential depth of flooding of 300mm – 900mm during a 1 in 30 year event and over 900mm during a 1 in 100 year event (although it is noted that this mapping is based on a number of assumptions and does not take into account the capacity of local drainage systems).

As shown on the appended cross-section, the land slopes down significantly from the front to the rear of the property (i.e. from Regent's Park Road to the rear yard area), which ties in with the identified surface water risk in the lower yard area only. We acknowledge that surface water could pond in this rear yard area during extreme rainfall events (although there are no reports of previous flooding within this area according to the Council's SFRA and information from the site owner). In accordance with the National Planning Policy Framework (NPPF), we understand that it is necessary to demonstrate that the development will be safe from a flood risk perspective, without resulting in an increase in flood



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risk. The safety of the development and the potential for an increase in flood risk are discussed below.

Safety of development

As a result of the difference in ground levels between Regent's Park Road at the front of the property and the yard at the rear, the ground floor level (lowest living accommodation) is raised more than 2 metres above the rear yard level as shown on the appended cross-section. Therefore, even during a 1 in 100 year event (with indicative water depths in the yard of over 900mm according to Environment Agency mapping), any surface water flooding in the rear yard is highly unlikely to enter the ground floor of the property. The basement level will be used for non-living (storage / plant) use only. In view of this, and the direct access from the front of the building onto Regents Park Road (which is at a low risk of surface water flooding) the proposed use is considered to be safe from a surface water flood risk perspective.

Increase in flood risk

The proposal comprises a change of use of the existing property, and there are no proposals to change the drainage system or hardstanding in the rear yard area. There will be no increase in hardstanding area as a result of the change of use, and therefore no increase in surface water runoff. Therefore, there will be no increase in flood risk, in accordance with the NPPF.

In order to install any attenuation features, such as permeable paving or an attenuation tank, it would be necessary to take up the existing hardstanding and re-lay the drainage system. Given the small scale of the application (change of use only), this is not considered proportionate or sustainable. In addition, the storage benefits that could be provided within such a small area (approximately 100m², the size of six car parking spaces) would be negligible. As noted by the Sustainability Officer, infiltration methods are unlikely to be suitable given the low permeability of the underlying London Clay. It is noted that the application site includes only part of a larger yard area associated with neighbouring properties, and in order to provide any improvements to the surface water system within the application boundary, works would also be required on third party land.

Summary

In summary, it is considered that the proposed use will not be at risk from surface water flooding during a 1 in 100 year event (and as discussed in the originally submitted Flood Risk Report is not at risk from other sources of flooding). In addition, there will be no increase in flood risk as a result of the proposal, and although the potential to incorporate sustainable drainage measures has been considered, it would not be feasible (proportionate or sustainable) to do so given the small area available for such measures and the fact that no changes to the existing hardstanding / drainage system are proposed.





We hope that this letter addresses the comments provided by the Sustainability Officer, but would welcome the opportunity to discuss this further if they have any outstanding queries. My direct dial is provided below.

Yours sincerely,
For RPS Health, Safety & Environment

Alison Cadge
Principal Environmental Consultant
Direct dial: 020 7280 3310

Attachment: Cross-section plan

