

[REDACTED]

From: McCarthy, Mark [REDACTED]
Sent: 06 October 2015 14:55
To: Young, Tony
Subject: RE: 68a-74a Rochester Place - 2015/5072/P

Dear Mr Young,

I am responding to your helpful letter below, indicating the consultation on GPDO which is open until 8 October 2015.

I attach our concerns about the legal requirement of **evidence for flooding risk**. The application provides three maps without commentary. One of the maps shows severe risk of surface flooding. There is no assessment of groundwater flooding.

Please find the attached document requesting further information to be provided by the applicant for us to be able to restart the consultation indicated in your letter. At present we suggest the application has a strong reason for refusing GPDO.

Please can you also ensure our comment is presented on the web.

With thanks

Mark McCarthy

South Kentish Town CAAC.

From: Young, Tony [REDACTED]
Sent: 08 September 2015 12:06
To: McCarthy, Mark
Subject: 68a-74a Rochester Place - 2015/5072/P

Dear Mark

I just wanted to let you know that the applicant has submitted a GPDO prior approval application for the above address. The application is registered and details are available on the Council's website.

Consultation will be carried out in accordance with the statement of community involvement, which includes in this instance, neighbour letters (including all respondees to any previous application), a site notice, newspaper advertisement, as well as, notifications to yourself and the Reed's & Rochester Place Neighbourhood Association.

Please send any response directly to me at this email address or contact me should you have any queries.

Regards

Tony

Tony Young - Planning Technician
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Response from South Kentish Town CAAC

It is welcome to be consulted on the proposal of change of use of 68-74 Rochester Terrace.

1. The 2015 Town and Country Planning Act, under Section O considers change of use from offices to residences. The Act requires developers and local authorities to consider (2c) 'flooding risks on the site'.

The applicant has provided maps from the Environment Agency which show there is a **high risk of surface flooding** at this point in Rochester Place, related to local topography and the Fleet River:



The applicant may also consider **groundwater flooding**, which can occur on hillsides and may rise up through the floor rather than through the doors (Ref: Environment Agency: Flooding from groundwater).

2. Section W of the Act states the application must be accompanied by
(a) a **written** description of the proposed development
(e) where sub-paragraph (6) requires the Environment Agency to be consulted, a site-specific flood risk assessment.

Please can the applicant provide a written description of the development proposed: there is only a single plan diagram in the application.

The Environment Agency map shows a high risk of surface flooding. **LB Camden needs to advise the applicant and consultees** whether the site is within Flood Zone 1, with critical drainage problems and whether it has been notified to the local planning authority for the purpose of paragraph (zc)(ii) in the Table in Schedule 4 to the Procedure Order.

3. Camden's DP22 – Promoting sustainable design and construction states that the council will require development to be resilient to climate change by ensuring schemes include appropriate climate change adaptation measures. It also states that Camden will minimise the potential for surface water flooding by requiring development to avoid harm to drainage systems and prevent or mitigate

local surface water and down-stream flooding, especially in areas up-hill from, and in, areas known to be at risk from surface water flooding.

Camden's Flood Risk Management Strategy provides a map of surface run-off in Camden, Rochester Place lies in Camden South adjacent to the Thames River flood zone.

Camden also requires "a real change on the ground rather than just reports and models, whereby partners and stakeholders take ownership of their flood risk and commit to delivery and maintenance of the recommended measures and actions".

The application has no assessment of the implications of the flood risk, nor local management plan. **Please can the applicant provide a full flood risk assessment by a qualified expert, and evidence of a shared flood risk management plan for Rochester Place.** Attention to historic experience, and the siting and effectiveness of drainage, is crucial.

4. The Conservation Area Committee will be pleased to restart the consultation when furnished with all this material, and will thereafter need a **full further period of 21 days**. At present, satisfactory consultation is not possible.