

Application No:	Consultees Name:	Received:	Comment:	Response:
2022/3140/P	CRASH	13/10/2022 23:25:42	OBJ	<p>CRASH (Combined Residents Association of South Hampstead) would like to object to the construction of a new basement at this property. In doing so CRASH refers to Camden's Strategic Flood Risk Assessment which notes that the "main mechanism impacting groundwater levels is the disruption of groundwater flows through basement development. The creation of a barrier in the sub-surface may cause an obstruction to groundwater flow, which can lead to a change in the water table upstream or downstream."</p> <p>In contrast to the contents of the applicant's BIA which states that there has not been flooding and the impact on groundwater flows would be minimal, this property falls within Camden Local Flood Risk Zone – "Goldhurst" and in Critical Drainage Area Group 3_010. Policy CC3 of Camden's Local Plan 2017 states that the Council will require all development in areas at risk of flooding to protect the property and surrounding area from increased flood risk. The Local Plan defines areas which are at risk of flooding as any previously flooded street and areas within Local Flood Risk Zones (identified in the Surface Water Management Plan<sup>18</sup> and Strategic Flood Risk Assessment<sup>19</sup>). CRASH would also ask that Camden's recent consultation on flooding and the feedback and developing recommendations are taken into consideration when this application is considered.</p> <p>In addition, developments in defined local Flood Risk Zones (as this one is), which have been identified as being at risk of surface water flooding must be designed to cope with storm events with a 1% chance of happening in any one year/ 1 in 100-year return period (including an appropriate allowance for climate change). The LLFA assess compliance by requiring and reviewing Flood Risk Assessments (FRA) for developments in local Flood Risk Zones. The FRA must consider whether the development will increase flood risk and propose mitigating measures to reduce the impact of flooding at the site and surrounding area. CRASH is not clear due to the length and complexity of the documents whether the BIA has covered this.</p> <p>CRASH welcomes the offer of planting a new tree at the front of the driveway which would contribute positively to public and environmental amenity.</p>

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