

Chris Grace
London Borough of Wandsworth
Head of Development Control
Town Hall Wandsworth High Street
London
SW18 2PU

Our ref: SL/2008/102982/02-L01
Your ref: 2007/5826
Date: 13 March 2008

Dear Sir,

PROPOSAL: DEMOLITION OF EXISTING BUILDINGS AND CONSTRUCTION OF A 1-11 STOREY BUILDING TO PROVIDE 128 RETIREMENT FLATS INCLUDING UNDERGROUND PARKING FOR 13 CARS; ASSOCIATED CARE FACILITIES, HIGHWAY IMPROVEMENTS AND LANDSCAPING

LOCATION: SITE OF RALPH WEST HALL, 45 WORFIELD STREET, SW11

DOCUMENTS: LETTER FROM LONDON BOROUGH OF WANDSWORTH, REF: 2007/5826, DATED 11 MARCH 2008, REGARDING SEQUENTIAL TEST; LETTER FROM DP9, DATED 13 MARCH 2008; LETTER FROM PELL FRISCHMANN, REF: A12006/VAB, DATED 12 MARCH 2008.

Further to our previous letter dated 11 March 2008 and a review of the above information received from London Borough of Wandsworth, the Environment Agency **maintains its objections** to the proposed development, as submitted, for the following reasons:

Reason 1:

PPS25 requires decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. In this instance, insufficient information has been submitted to demonstrate that potentially more suitable sites for an elderly care home have been considered with regard to flood risk as part of the submitted Sequential Test evidence.

Resolution:

The Local Planning Authority should carry out a flood risk Sequential Test that demonstrates that no alternative sites are reasonably available in areas with a lower probability of flooding that would be appropriate for the type of development proposed. Bearing in mind that the proposed development is a residential elderly care home and the potential stress this may place on the occupants, staff and emergency services in a flood event.

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30-34 Albert Embankment, London, SE1 7TL.
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Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk
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A framework and details of the responsibilities for applying the Sequential Test to planning applications can be found in Chapter 3 of the PPS25 practice guide. Which can be found at <http://www.communities.gov.uk/index.asp?id=1504639>, and we recommend that the questions contained within it are completed and submitted to your Authority as part of the application. Further information is also available at www.pipernetworking.com/floodrisk.

Reason 2:

The proposed residential care home includes sleeping accommodation on the ground floor. Ground floor accommodation at the finished floor level proposed will be subject to a high risk of flooding should the Thames tidal defences breach or overtop. This is an unacceptable residual risk and is not in line with the precautionary principle stated within national Planning Policy Statement 25: Development and Flood Risk (PPS25).

Resolution:

The applicant should revise the proposals so that residential care home accommodation is located above the 1 in 200 year flood level (plus climate change). The applicant has the option of either undertaking a hydraulic breach analysis to determine flood levels on the site and setting the ground floor above this level or setting all sleeping accommodation above the corresponding 1 in 200 year flood level (plus climate change) for the Thames at Albert Bridge. Further, the applicant should submit details of a safe evacuation plan in the event of a flood.

Reason 3:

The submitted FRA does not adequately address how the proposed development will utilise sustainable drainage techniques (SUDS) to manage surface water run-off to the required standard.

Resolution:

The applicant should demonstrate how the principles of Sustainable Drainage Systems have been applied to the development in line with the guidance contained in Appendix F of PPS25. The applicant should refer to the SUDS hierarchy and should consider the use of techniques such as green roofs or swales at the site. Oversize pipes and tanks can not be considered as a SUDS solution and should only be used in combination with more sustainable techniques, such as green roofs.

Advice to the Local Planning Authority:

Further to DP9s letter dated 13 March 2008 the Environment Agency **does not** consider it acceptable to condition the undertaking of a breach analysis, as the production of a satisfactory FRA is key to establishing the principle and design of the proposed development with regard to flood risk. Therefore, and in light of the above objections, we consider the proposed development to be contrary to Policy RDP10 of the Wandsworth UDP which states: *"Development will not be permitted if: (a) it would be liable to risk of flooding unless it is accompanied by satisfactory mitigating measures; or (b) it is likely to have an unacceptable impact on flood protection, or water management or quality."*

If you intend approving the application contrary to our objection, paragraphs 26 - 28 of PPS25 advise that you contact the Environment Agency again, to explain why, and to give us the opportunity to make further representations. Please note the further requirements in paragraph 28 in respect of the Flooding Direction if the application is for major development.

If you refuse the planning application and the applicant lodges an appeal, we would be prepared to support you and provide evidence at any public inquiry or informal hearing.

To avoid future objections we are promoting early pre application discussions and attach the pre application form.

<http://www.environment-agency.gov.uk/aboutus/512398/908812/1351053/1351105/?version=1&lang=e>

This should prevent consultations reaching planning application stage with insufficient information.

Yours sincerely

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cc D P 9

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