

Mr. Richard McEllistrum
Waltham Forest Borough Council
Planning & Transportation Service
Waltham Forest Town Hall Forest Road
London
E17 4JF

Our ref: NE/2011/112644/01-L01
Your ref: 2011/0898
Date: 22 August 2011

Richard.mcellistrum@walthamforest.gov.uk

Dear Mr. McEllistrum

Demolition of curtilage listed buildings, south-west spectator stand and part of popular entrance, conversion, alterations and extensions to the main tote building for leisure use and conversion and alteration to eastern tote and kennels for community allotment use. New build residential accommodation in buildings between 2 and 8 storeys in height, comprising 301 dwellings (84 houses and 217 flats, including 1, 2, 3, & 4 bedroom units and a mix of private and affordable housing). New buildings for use as a children's nursery, cafe and creche, open space provision (public, private and communal), car, motorcycle and bicycle parking and vehicular access though existing Chingford Road entrance. Associated alterations and landscaping including alterations to public right of way and de-culverting of the river ching.

Walthamstow Dog's Stadium, 300 Chingford Road, Chingford, E4 8SL

Thank you for consulting us on the above application. We object to the proposed development for the following reasons:

1. No Sequential Test

We **object** to this application in the absence of any evidence to demonstrate that the flood risk Sequential Test has been applied. We recommend that until then the application should not be determined for the following reasons:

Reasons: The application site lies within Flood Zone 3 defined by Planning Policy Statement 25 as having a high probability of flooding. Paragraph D5 of PPS25 requires decision-makers to steer new development to areas at the lowest probability of flooding by applying a 'Sequential Test'. In this instance no evidence has been provided to indicate that this test has been carried out.

We ask to be reconsulted with the results of the Sequential Test. Our objection will remain until your Authority has carried out the Sequential Test to demonstrate that there are no reasonably available alternative sites in areas with a lower probability of flooding that would be appropriate for the type of development proposed.

Cont/d..



2. Inadequate Flood Risk Assessment

In the absence of an acceptable Flood Risk Assessment (FRA) we **object** to the grant of planning permission and recommend refusal on this basis for the following reasons:

Reason: The FRA submitted with this application does not comply with the requirements set out in Annex E, paragraph E3 of Planning Policy Statement 25 (PPS 25). The submitted FRA does not therefore, provide a suitable basis for assessment to be made of the flood risks arising from the proposed development.

In particular, the submitted FRA fails to:

- Provide an appropriate assessment of the flood risks associated with the site and the proposed development.
- Demonstrate that the development and its users will be safe during all flood events up to and including the 1 in 100 chance in any year event, taking the effects of climate change into account.
- Demonstrate that residents and site users will have a safe means of access and egress during all flood events up to and including the 1 in 100 chance in any year event, taking the effects of climate change into account.

Additional comments:

The submitted FRA is not the most up to date version that we have reviewed at the pre-application stage.

The 3rd party model review has shown that there are some issues that need to be addressed before the model can be considered completely fit for purpose. These specific comments have been sent back to the applicant.

Until the specific issues regarding the model have been addressed, we can not make any definitive comments on the appropriateness of the FRA. This is because the assessment may change as a result of any changes to the model.

We do have the following general comments based on the FRA as it stands:

Finished Floor Levels

We are now happy with the proposals for setting of finished floor levels as described in section 3.11 of the FRA.

Offsite increases in flood risk

The model review has demonstrated that the small offsite areas of increased flood risk shown in Figure TN1.4 can be considered inconsequential, because the changes of in channel flood level are very small and are within the tolerances normally accepted with this type of model.

Please note: The model review highlights that the model may be very sensitive to Mannings 'n' values. The applicant will need to address this issue and any resulting changes in the model will need to be taken into account when assessing off site flood risk.

Once the Mannings 'n' issue has been resolved, if the changes in flood levels are comparable in scale to how they are currently shown, then we will be satisfied that the proposed development does not cause an unacceptable increase in flood risk.

Safe Access and Egress

We now understand the method used to determine the safe access/egress route and am happy that it shows a very low hazard route. However, we understand that there is a debris factor involved in the calculation method within the model and that the results are sensitive to this factor. The applicant will need to provide some evidence that a suitable debris factor has been used.

Plan Colour Scheme

The colour scheme used on Figure TN1.4 is confusing. The reviewers found it hard to distinguish between areas that now flood and areas that used to flood. I recommend that completely different colours are used rather than different shades of the same colour.”

FRA Versions

Version 4 of the FRA that has been submitted with this application does not represent an acceptable solution for the setting of finished floor levels as described in section 3.11 of version 5. The applicant will need to submit version 5 or a version containing the updated paragraph 3.11 before we can consider the proposals acceptable.

Considering the outcome of the recent model review, comments regarding all other aspects of the FRA remain the same for both versions.

In summary, in order for the proposals to be considered acceptable from a flood risk perspective, the applicant will need to adequately address the following:

- The finished floor level issue and the discrepancy between versions 4 and 5 of the FRA. (Essential)
- The Mannings ‘n’ issue relating to the model, as described in the pre-app response above. (Essential)
- The Debris Factor issue relating to safe access and egress as described in the pre-app response above. (Essential)
- The colour scheme used in Figure TN1.4. (Preferred)

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us as advised in PPS25 paragraph 26-28.

If you have any queries, in regards to the above, please do not hesitate to contact me.

Yours sincerely

Ms Karen Foster
Planning Liaison Officer

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