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Waltham Forest Borough Council  
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Waltham Forest Town Hall Forest Road  
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**Our ref:** NE/2012/115024/02-L01  
**Your ref:** 2012/0687  
**Date:** 9 August 2012

By email  
[Robert.Hewson@walthamforest.gov.uk](mailto:Robert.Hewson@walthamforest.gov.uk)

Dear Robert

**The Hale End Road Sports Ground. 99 Wadham Road Walthamstow London E17 4LU.**

**Demolition of existing pavillion and store buildings, construction of two storey facilities buildings, and part two storey part single storey residential.**

Thank you for your email on the 26 July with attached Technical Note by Lanmor Consulting and your subsequent email on the 8 August. Having considered this information we maintain our objection to the proposed development as submitted on flood risk grounds and recommend that planning permission is refused or the applicant withdraw the scheme. Our concerns remain that this proposal places vulnerable uses in the functional floodplain (Flood Zone 3b) and in addition the Flood Risk Assessment (FRA) and subsequent Technical Note has failed to demonstrate to us that the development can be made safe for the end users and will not increase flood risk elsewhere. In our view the proposed development does not accord with your Core Strategy Policy CS4 (I) which aims to direct developments away from areas at high risk of flooding and aim to achieve an overall reduction in flood risk.

The modelling indicates that the vast majority of the site where new development is proposed will flood during the 1 in 20 year flood event. A slightly larger area is shown to flood during the 1 in 100 year flood event, taking the effects of climate change into account.

We agree with your email dated 8 August 2012 that in accordance with your Strategic Flood Risk Assessment the footprint of existing buildings should not be classified as Flood Zone 3b as they prevent the influx of floodwater. However the applicant includes the surrounding hard standing areas such as the car park as part of this existing footprint and consider this as outside of Flood Zone 3b. Areas that do currently flood during the 1 in 20 include car parks and hardstanding (unless it can be demonstrated that they are higher than the 1 in 20 flood depth) and these act as flood storage areas and so should still be considered Flood Zone 3b. Our concern is that the proposed buildings (of which some are classified as More Vulnerable according to Table 2 and 3 of the NPPF Technical Guide) are



located in this Flood Zone 3b area.

If the footprints of the proposed accommodation block and facilities buildings are the same or smaller and in the same location as the existing buildings then they can be considered as outside of Flood Zone 3b. This would be acceptable subject to satisfying the requirements of the sequential test and a site specific FRA.

The proposed development has the potential to reduce floodplain storage volumes and increase flood risk offsite. The flood extents come close to other residences in the vicinity of the site. The proposals will only be acceptable if sufficient information has been provided to show that floodplain storage volume will not be reduced by the development and flood risk is not increased for neighbouring properties. The Technical Note by Lanmor Consulting presents a strategy for compensating for any storage losses caused by the development, and this included one building that is to be raised up on stilts. We advise that this is not a favourable solution and can only be appropriate if measures are in place to ensure the void space works as intended hydraulically and that it will last for the lifetime of the development. In order for the compensation proposals to be considered appropriate, the applicant will need to preferably provide a solution that does not rely on void space below buildings. If this is not possible, then further details about the void space will need to be provided as described above.

The residents and site users need to have a means of safe access and egress from the site during all flood events up to and including the 1 in 100 year event, taking the effects of climate change into account. The FRA dated March 2012 does not demonstrate that the residents of the block will have safe access and egress. The FRA states that Grove Park Avenue is above the 0.1% flood level, however, there has been insufficient evidence provided to demonstrate this. There are modelled 1 in 100 year flood levels, including the affects of climate change surrounding the area that are higher than the levels shown on the topographical survey for Grove Park Avenue. In addition, safe access/egress must allow residents to leave the site safely and get to a dry location not in the floodplain, that is accessible from the wider area. Our information shows that Grove Park Avenue is a "dry island" surrounded by flood waters during the 1 in 100 CC flood event. In order to demonstrate safe access, the applicant will need to increase the extent of the route analysis to establish whether an appropriate safe access route can currently exist. If it does not, then it may be possible to overcome this issue with an appropriate flood evacuation plan. This would need to be supported by appropriate information in the FRA such as flood depth and velocity and time of onset of flooding. Access/egress on to Wadham Road will only be considered appropriate if it can be demonstrated that site users will be able to reach this point safely, from all parts of the site/development. At this stage, all the proposed buildings are shown to be flooded during the 1 in 100 CC event and no assessment has been provided of the risk of travelling through the flood waters to Wadham Road. The LPA would need to agree that a flood evacuation plan approach is appropriate and subsequently review any plan submitted.

We welcome further discussions with the applicant and will be providing some detailed comments in response to the Technical Note directly to them.

I trust this clarifies our position. If you have any queries please contact me.

Yours sincerely

**Miss Eleri Randall**  
**Planning Liaison Officer**

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