

Flood Risk Addendum for the Exception Test: Clarification Response

In March 2022, Corylus prepared a Flood Risk Assessment (Document Ref. *ES Appendix 12.1 FRA - 512_Stag_Brewery_FRA_v5d_220303*). This was submitted as part of the planning applications for the hybrid Application A (ref: 22/0900/OUT) and school Application B (ref: 22/0902/FUL) of the March 2022 Environmental Statement. An FRA Addendum was issued in March 2023 to provide clarification in respect of the Exception Test and Flood Resistance and Resilience. The Addendum was revised following the receipt of comments from LBRuT and has now been reissued (Document Ref. 512/SP02/ADDENDUM by Corylus dated April 2023). Whilst the FRA Addendum sets out a detailed response and has been updated where applicable in respect of the below clarifications, in order to assist LBRuT in their review of the FRA and FRA Addendum, the specific clarification requests made by LBRuT are also set out below.

Request for Clarification: *“The sustainability benefits considers only ecological, well being, energy and resource management – how about economic and social?”*

It is acknowledged that the FRA Addendum focusses on the sustainability benefits through ecological, well being, energy and resource management. There are numerous economic and social benefits of the Development, for instance as those noted within the Planning Statement (March 2022, report ref: 4150-7644-7284, v. 1). The economic and social sustainability benefits have now been incorporated into the FRA Addendum within Section 2, and extracts from the Planning Statement are included within Appendix A.

Request for Clarification: *“I am still awaiting the BIA and therefore I am not sure how it can already be concluded the development will not increase flood risk elsewhere.”*

The Basement Impact Assessment (BIA) has now been provided (report ref: WIE18671-100.R.24.2.2.BIA). The consultants preparing both the FRA and FRA Addendum and BIA have done so in collaboration, where applicable, and they are consistent. The FRA informs the BIA and is provided as Appendix C of the BIA and is detailed in Sections 2.4 and 2.5 of the BIA. The FRA Addendum is informed by both the FRA and BIA (Sections 3.2 vi and 3.2 vii and 3.3 iv).

Request for Clarification: *“The documents states all FFL for the residential development are a minim level of 7.03m AOD, but this is not correct – the FRA refers to lower levels for the Maltings.”*

The FRA Addendum has been updated, notably in Sections 3.2 ii and iii and Appendix B.

“Other than some exceptions, ... the default minimum ground level for the site is at 6.03 mAOD, with the minimum residential FFL at 7.03 mAOD. Within the Maltings the FFL for the Flexible use space on the ground floor is at 4.74 mAOD, well below the reference flood level. Furthermore, the exits from the residential properties on the upper floors of the Maltings is at 5.53 mAOD, also below the reference flood level.”

Level 1 of the Maltings (where the lowest residential accommodation is) is at 8.63 mAOD. The ground floor only has flexible use, refuse stores and residential entrances. As noted in Appendix B of the FRA Addendum, there is no practical route for water to affect this part of the Site. If it did, the hazard rating for the access is graded as “safe for all” to reach a safe level of 6.03 mAOD.

Request for Clarification: *“I expected more details (bullet points) on how the development is not increasing flood risk elsewhere, will reduce flood risk where possible, and how it is safe for the lifetime of development.”*

There are relatively few bullet points here due to the nature of the development. Although it is a riverside Site, it is on land that is affected by tidal flooding and is behind substantial defences. It does not therefore impact on flood flows nor on flood storage which explains why it has a negligible impact and why there is limited requirement for mitigation. If this had been a riverside site that was affected

by fluvial flooding, such as the Teddington Riverside development for which the FRA was undertaken by Hydro-Logic Services, then there would have been a greater level of impacts and of mitigation requirements.

Further bullets have been provided within the FRA Addendum (Section 3.2 ii, vii, xi; Section 3.3 iii, Section 3.4 iii, iv, v).