

# **FLOOD RISK ASSESSMENT**

**TO SUPPORT PLANNING APPLICATION FOR  
CONSTRUCTION OF PART TWO STOREY AND PART SINGLE STOREY ATTACHED DWELLINGHOUSE;  
PROVISION OF REFUSE / RECYCLING STORAGE, AND AMENITY SPACE  
AND  
ASSOCIATED ALTERATIONS TO 15 TAYBEN AVENUE;  
(FOLLOWING DEMOLITION OF EXISTING WORKSHOP / STORAGE TO 15 TAYBEN AVENUE,  
GARAGE TO 13 TAYBEN AVENUE  
AND  
RE-POSITION OF BOUNDARY)**

## **1. INTRODUCTION**

The London Borough of Richmond Upon Thames (the "Council") Local Validation Checklist requires a **Flood Risk Assessment** to be submitted for all development proposals within zones 2 and 3.

This **Flood Risk Assessment** is therefore submitted in support of the planning application, to the London Borough of Richmond Upon Thames Planning department (the "Council"), for the:

- Demolition of the existing garage to 13 Tayben Avenue,
- Demolition of the existing storage / home workshop to 15 Tayben Avenue,
- Removal and re-positioning of boundary between 13 and 15 Tayben Avenue,
- Erection of a two storey extension with rear single storey extension to the side of 13 Tayben Avenue to form a new self-contained dwelling (the "Proposed"), and
- Associated alterations to 15 Tayben Avenue; (the "Proposed Development").

Where, in this Statement:

- Measurements are given, they are approximates and in metres.
- Extracts of plans, maps and or drawings are shown, they are not to scale.
- Photographs are shown, they are also not to scale and, unless otherwise stated, are as at 2023.
- Lettering and numbers are in:
  - 'curved' brackets, they are drawing numbers of architectural plans.
- Quotations are coloured in:
  - **Brown**, they are text from the quoted caselaw; and
  - **Blue**, they are text from the quoted planning legislation / policy / guidance.

The planning application for the Proposed Development (the "Planning Application") is essentially an amended submission for the development proposed under planning application 22/3276/FUL (the "Original Planning Application"). The Original Planning Application was refused by the Council on 12.05.2023.

The matter was referred to appeal, under appeal reference APP/L5810/W/23/3332811 (the "Appeal"). The Appeal was assessed by Inspector C Livingstone MA (SocSci) (Hons) MSc MRTPI (the "Inspector") on 23.07.24. The Inspector dismissed the Appeal on 23.07.2024 (the "Appeal Decision") because "*...there is no suitable mechanism before me to secure an affordable housing contribution or restrict parking...*"; i.e. no completed Unilateral Undertaking, pursuant to section 106 of the of the Town and Country Planning Act 1990 (as amended) had been provided.

## **1. PLANNING POLICIES & GUIDANCE**

The Applicant understands the following:

- Below legislation / national policy is the London Plan, which forms part of the ‘development plan’.
- The ‘development plan’ contains a set of policies and guidance for development of the borough and the Council’s ‘local plan’ (adopted by the Council on 03.07.2018) (the “Local Plan”) also forms part of this ‘development plan’.
- The legislation provides that planning decisions must be taken in accordance with the ‘development plan’ unless there are material considerations that indicate otherwise.
- The Council’s Local Plan is within the framework of material planning considerations.
- The Council’s Supplementary Planning Documents (“SPD”) provide greater detail on policies.
- The Council have prepared a new ‘local plan’. This was made available for public consultation on 09.06.2023 and this ended on 24.07.24. The Applicant understands that, by submitting the Richmond Publication Version Local Plan (Regulation 19 version) (the “Draft Plan”) for independent examination, the Council has formally confirmed its intention to adopt the Draft Plan and its supporting documents is now a ‘material planning consideration’.

### **2.A. National / Development & Local Plan Policies**

The main development plan policies are as follows:

- National Planning Policy Framework (NPPF)
- Planning Practice Guidance (PPG)
- Nationally Described Space Standards (2015)
- London Plan Guidance Fire Safety Policy D12(A) Pre-Consultation Draft, March 2021
- Building Regulations
- London Plan 2021
  - Policy D12
  - Policy SI 15 – Water Infrastructure
  - Policy GG 6 – Increasing Efficiency and Resilience
  - Chapter 6 – London’s Transport
- Local Plan
  - Policy LP 1 Local Character and Design Quality
  - Policy LP 2 Building Heights
  - Policy LP 8 Amenity and Living Conditions
  - Policy LP 21 Flood Risk and Sustainable Drainage
  - Policy LP 22 Sustainable Design and Construction
  - Policy LP 34 New Housing
  - Policy LP 35 Housing Mix and Standards
  - Policy LP 36 Affordable Housing
  - Policy LP 37 Housing Needs of Different Groups
  - Policy LP 39 Infill, Backland and Backgarden Development
  - Policy LP 45 Parking standards and servicing

### **2.B. LBRUT’s Supplementary Planning Documents / Guidance**

The main SPDs are as follows:

- House Extensions and External Alterations SPD (2015) (“HEAEA SPD”)

- Residential Development Standards SPD (2010) (“RDS SPD”)
- Sustainability Construction Checklist SPD (2011) (SCC SPD”)
- Design Quality SPD (2006) (“DQ SPD”)
- Planning Obligations SPD (2014) (“PO SPD”)
- Affordable Housing SPD (2014) (“AH SPD”)
- Refuse and Recycling Storage Requirements SPD (2015) (“RARSR SPD”)
- Front and Other Off-Street Parking Standards (2006) (“FAOOSPS SPD”)

**2.C. Policy LP 21**

Policy 21 states:

*“All developments should avoid, or minimise, contributing to all sources of flooding, including fluvial, tidal, surface water, groundwater and flooding from sewers, taking account of climate change and without increasing flood risk elsewhere.”*

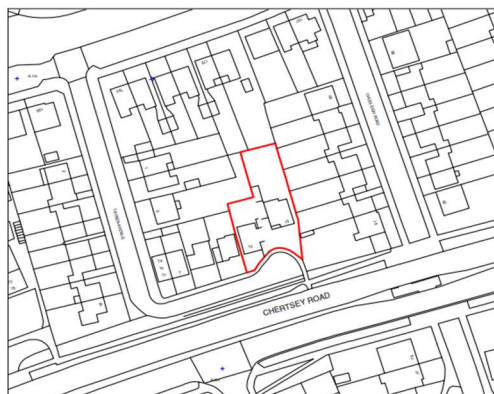
Paragraph 6.2.1 states:

*“The Environment Agency produces Flood Maps for Planning with a nationally consistent delineation of “high” (Flood Zone 3), “medium” (Flood Zone 2) and “low” (Flood Zone 1) flood zones, which are updated and published on a quarterly basis.”*

**2. SITE LOCATION**

**3.A. The Application Site**

The Application Site is identified by red edging on the ‘location plan’ (TP-574/NH01). An extract of the said ‘location plan’, is at **Figure 1**.



LOCATION PLAN  
1 : 1250 SCALE

0m 10m 20m 30m 40m 50m 60m 70m 80m 90m 100m  
SCALE @ 1:1250

**Figure 1.**

The Application Site is on the northern side of Tayben Avenue and at the end of a cul-de-sac, which is solely residential. The Application Site consists of 13 and 15 Tayben Avenue, Twickenham, TW2 7RA and is 22.1m wide. The Application Site is not within a Conservation Area.

**3.B. The Surrounding Area**

**3.B.(i) *Immediate Surrounding Area***

### ***Whitton Road***

As can be seen from the 'location plan' (TP-574/NH01) and **Figure 1**, Tayben Avenue is accessed to and from a 'main road'; Whitton Road.

The area, in general, is predominantly residential. Twickenham Stadium, the Marriot Hotel and Virgin Active Health Club however is to the north / north east of the Application Site, on Whitton Road.

### ***The A316 Chertsey Road***

To the south of Tayben Avenue is the A316 Chertsey Road.

### **3.C. Use**

#### ***13 Tayben Avenue***

The existing is a two storey private self contained 3 bedroom detached residential dwelling with attached garage.

#### ***15 Tayben Avenue***

The existing is also a three storey self contained private 3 bedroom detached residential dwelling.

### **3. PROPOSAL**

The proposal involves the Proposed and the Proposed Development at the Proposed Site.

### **4. FLOOD RISK ASSESSMENT**

Attached is a copy of an e-mail dated 03.10.22 received from James Hammett of [HNLenquiries@environment-agency.gov.uk](mailto:HNLenquiries@environment-agency.gov.uk) in response to a request for (1) the latest flood map and (2) the line of tidal flood defence and the state of the flood defences for sites next to the River Thames.

#### **5.A. Latest Flood Map**

The latest Flood Plan map shows that the site is in Flood Zone 2, a medium probability of flooding. That is to say that the chance of flooding each year is less than 1 percent (1 in 100), but greater than or equal to 0.1 percent (1 in 1000). This takes into account the effect of any flood defences that may be in this area.

The property is on the edge of Flood Zone 2 indicating surface water runoff to the east and north east away from the property. The ordinance survey shows that the surrounding area inclines down from the property.

The Environmental Agency guidance for development of this type recommends the following approach to flood risk assessments in the flood zone and to mitigate the impact of flooding the following methods will be employed:

1. The floor level of the ground floor extension will be no lower than the existing ground floor level. No sequential test is therefore required for this proposal.
2. The occupants will be advised to subscribe to the Environment Agency flood warning service.
3. Flood proofing has been considered and incorporated where necessary.

**5.B. Tidal Flood Defence and State of the Flood Defences for Sites Next to the River Thames**

***Thames Tidal Upriver Breach Inundation Modelling 2017***

It is believed that the Thames Tidal Upriver Breach Inundation Modelling 2017 provides that the site falls outside of the combined extents of all of our new 2017 tidal breach modelling, and therefore there are no modelled breach flood levels to provide. It is therefore considered that the site to be at extreme low residual risk of tidal flooding only.

**5. CONCLUSION**

The conclusion of this Statement is that the site is in Flood Zone 2, a medium probability of flooding. Flood proofing has been considered and incorporated where necessary and the floor level of the ground floor extension will be no lower than the existing ground floor level.

It is therefore considered that the proposal should be supported.

**21<sup>ST</sup> AUGUST 2024**

