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ANSTEE HOUSE, WOOD STREET, KINGSTON UPON THAMES

FLOOD RISK ASSESSMENT

JANUARY 2021

1.0 Site Description

The application site, referred to as Anstee House, is prominently located on the corner plot of Wood Street within Kingston Town Centre. The building lies immediately opposite the Grade II listed Bentall Shopping Centre to the east, which is connected to the multi-storey car park located to the rear of Anstee House by an elevated, covered footpath.

The building is positioned approximately 170m from the eastern bank of the River Thames, which flows through Kingston upon Thames. The application site falls within Flood Zone 2, which is to be addressed within this statement.

Anstee House is a three-storey building with a self-contained, ground floor entrance and reception area. The first and second floors are currently vacant, having most recently been used for educational purposes to cater for Kingston College's former occupation of the building. The main frontal elevation of the building fronts Wood Street and gradually curves round onto Steadfast Road to the west.

2.0 Proposed Development

The proposal comprises the change of use of the first and second floors of Anstee House from Use Class F1 Learning and Non-Residential Institutions (formerly Use Class D1), to Use Class E Commercial, Business and Service. The proposed change of use is required to enable the space to be occupied as a Job Centre, to be operated by the Department for Work and Pensions.

3.0 Flood Zone Status

The online Flood Map for Planning service identifies that the application site falls within Flood Zone 2. An extract of this plan is provided in Figure 1.

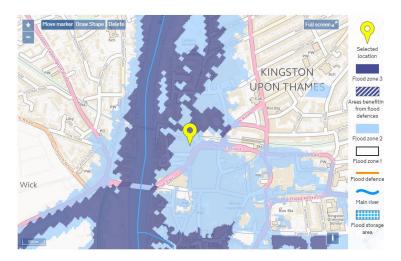


Figure 1. Extract of Flood Map for Planning identifying location of site within Flood Zone 2.



Flood Zone 2 includes land assessed as having a '1 in 100 and 1 in 1,000 annual probability of river flooding (1% - 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% - 0.1%) in any year'.

4.0 National Planning Policy Framework (2019)

Government guidance requires that consideration be given to flood risk in the planning process. The National Planning Policy Framework (2019) outlines the national policy on development and flood risk assessment.

The Framework states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.

When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

The Framework clarifies that applications for changes of use should not be subject to the sequential or exception tests.

The proposed change of use will not increase flood risk elsewhere. It does not include any changes to the external environment or the drainage to and around the existing building.

With reference to the points a) to e) taken from the Framework:

- a) the proposal does not incorporate any development classified as vulnerable development. Notwithstanding this, it is highlighted that all development relates to a change of use at the first and second floor level.
- b) the development is considered to be appropriately flood resistant and resilient by relating solely to upper floor levels.
- c) the proposal relates to an internal change use only and it is not appropriate to incorporate sustainable drainage systems.
- d) No residual risk exists to be managed.
- e) the existing building maintains existing access and escape routes and the proposed change of use does not change these arrangements.



5.0 Royal Borough of Kingston Upon Thames Core Strategy (2012)

In accordance with the Council's Policy DM4 (Water Management and Flood Risk) the proposed change of use has been considered and found to have no impact upon surface water flooding as a result of its location at the upper level and the absence of any external changes, changes to hard surfaces, or the existing drainage system.

The nature of the proposal is such that it is not feasible or appropriate to include Sustainable Urban Drainage Systems.

The change of use is proposed at the above-ground levels of an existing building and does not incorporate a vulnerable land use.

6.0 Planning Practice Guidance, Flood Risk and Coastal Change

The PPG provides additional guidance to Local Planning Authorities to ensure the effective implementation of the planning policy set out in the National Planning Practice Policy Framework on development in areas at risk of flooding.

The document provides supporting information on:

- The application of the sequential approach and Sequential and Exception Tests
- Measures to reduce flood risk to acceptable levels
- How to manage residual risks
- Guidance on how to take climate change into account.

As stated above, due to the nature of the proposal no additional flood risk will result.

7.0 Royal Borough of Kingston Upon Thames Strategic Flood Risk Assessment Level 1 and 2 (2011)

The SFRA is a planning tool that will assist Councils in their selection and development of sustainable site allocations away from vulnerable flood risk areas.

Kingston upon Thames has been delineated into zones of low, medium and high probability of flooding, based upon information provided by the Environment Agency

The proposal site forms part of 'Zone 2 Medium Probability'. Areas subject to flooding in events exceeding the 100 year event, and up to (and including) once in every 1000 years on average (i.e. Zone 2 Medium Probability) have been identified.

It is stated that 'highly vulnerable' development (e.g. essential community services and emergency services,) should be avoided in these areas. There are generally no other restrictions placed upon future development in these areas, however it is important to ensure that the developer takes account of possible climate change impacts to avoid a possible increase in the risk of flooding in future years (achieved through completion of a simple Flood Risk Assessment).

The proposed use is not classed as highly vulnerable, and being at the upper levels with no external changes proposed it is not considered to impact upon climate change or require mitigation.

The application site is located on the eastern edge of Character Area 5 – Riverside North. Whist specific comments are provided relating to the potential future redevelopment of this area, this is not applicable to the current application.



8.0 Conclusion

No external changes or changes to the ground floor level are proposed. The proposal will not introduce any vulnerable uses to the site, and does not increase the floor area or footprint of the site. It will not result in any increased hard landscaping or increase in quantum of development. In addition, the proposals will not increase water volume or surface water runoff in or immediately surrounding the application site. The proposal would not reduce flood water capacity. As such, the impact of the proposals on flooding or flood risk will be negligible/non-existent and are consistent with both local and national policy.

On this basis, the proposal is considered to be safe in the context of flood risk, and will not increase the risk of flooding elsewhere.