



# Flood Risk Assessment

## 8 Charles Street

November 2023





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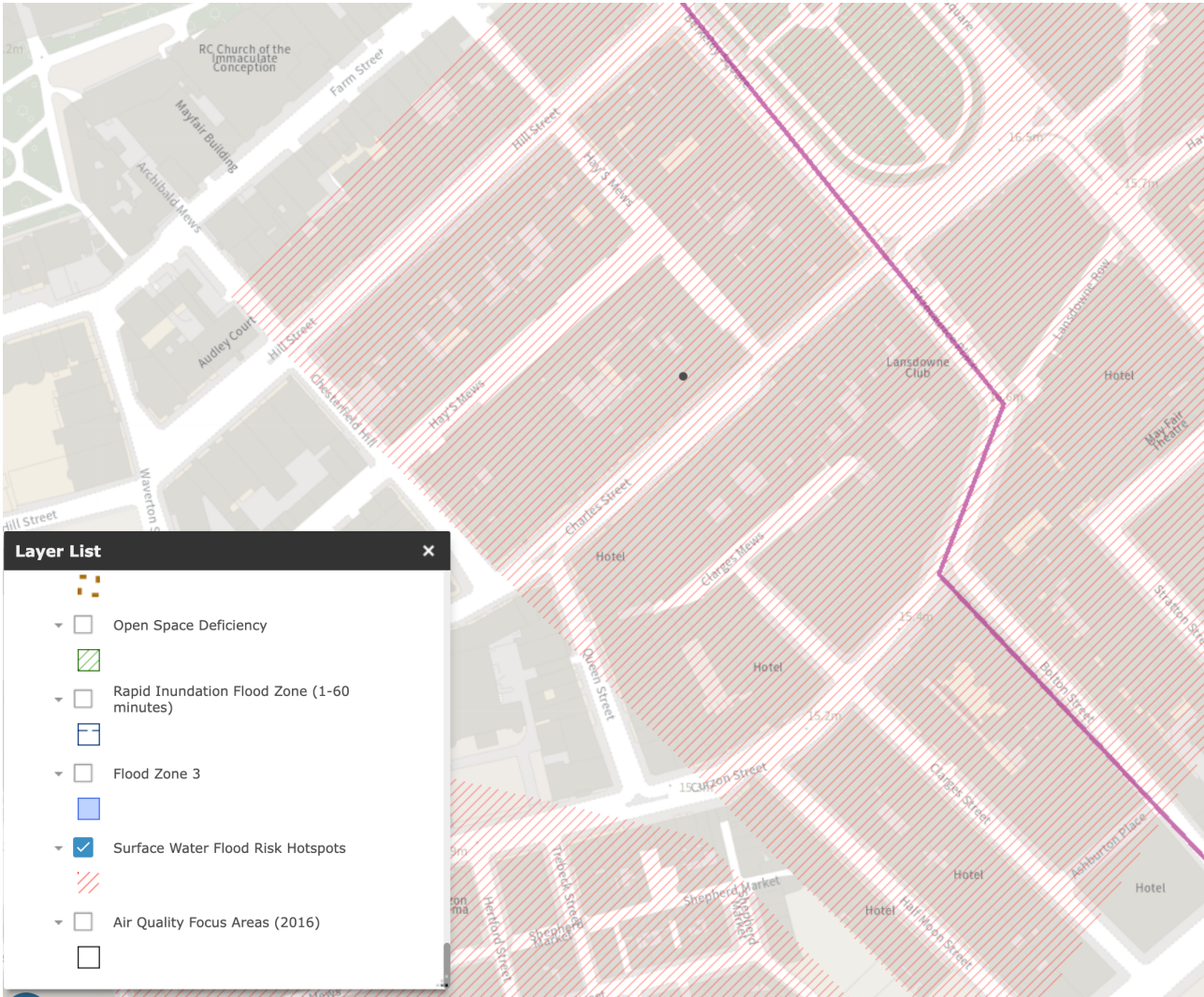
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### 1.0 INTRODUCTION

1.1 This Flood Risk Assessment has been prepared on behalf of Park Properties Investments Ltd, in support of a retrospective planning and listed building consent application to regularise various minor alterations at Flat 1, 8 Charles Street.

1.2 Flat 1 of 8 Charles Street is situated on the ground and lower ground floor of a Georgian Mayfair townhouse which is split into three dwellings. The building is located in the heart of Mayfair and dates from c. 1752 with 19th and 21st Century extensions. It is Grade II listed,

1.3 As shown in the below extract, the site is located within a Surface Water Flood Risk Hotspot area, as defined by the Westminster City Plan 2019-2040. This Hotspot area is a location where concertation of flooding incidents within a limited geographical context has appeared over time and particular attention is required in terms of flood risk management.



- 1.4 This report has been prepared in accordance with the guidance contained within the National Policy Framework (NPPF) and the accompanying Planning Practice guidance.

## 2.0 POLICY CONTEXT

2.1 Key flood risk policies are set out in Westminster's City Plan 2019-2040 (April 2021), the London Plan (March 2021) and the National Planning Policy Framework (September 2023).

2.2 City Plan Policy 35 deals with flood risk and states:

*A. All developments should be safe for their lifetime from the risk of flooding, complying with the council's Strategic Flood Risk Assessment (SFRA), Surface Water Management Plan (SWMP), Local Flood Risk Management Strategy (LFRMS) and the Mayor of London's Regional Flood Risk Appraisal (RFRA).*

*B. A site-specific Flood Risk Assessment (FRA) must be submitted for:*

- 1. developments of 1 hectare or greater;*
- 2. all developments in Flood Zones 2 and 3; and*
- 3. all developments within a Surface Water Flood Risk Hotspot.*

*C. Highly Vulnerable Uses will not be allowed within Flood Zone 3; in Flood Zone 2 they will be required to pass the Exception Test and should as far as possible be located outside of the Surface Water Flood Risk Hotspots.*

*D. Proposals for Essential Infrastructure and More Vulnerable Uses within Flood Zone 3 will be required to pass the Exception Test. Within the Rapid Inundation Zone, basement dwellings and basement extensions to existing dwellings will not be acceptable.*

*E. More Vulnerable Uses should, as far as possible, be directed away from Surface Water Flood Risk Hotspots.*

*F. A Flood Warning and Evacuation Plan will generally be required for More Vulnerable Uses within the areas at risk of tidal breach flooding, especially if the land use is within the Rapid Inundation Zone.*

*G. All existing flood management infrastructure will be protected, including access for maintenance. Wherever possible, an undeveloped buffer zone of 16m should be maintained around flood defence structures, including buried elements of the flood defence.*

*H. Improvements to flood defences will be secured through planning conditions and / or legal agreements where the size, type and / or location of development impacts on flood risk. Development should not limit future raising of flood defences outlined in the Thames Estuary 2100 Plan.*

*I. Where appropriate, planning permission for developments which result in the need for off-site upgrades to the water or sewerage network, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.*

*J. New development must incorporate Sustainable Drainage Systems (SuDS) to alleviate and manage surface water flood risk. Development should aim to achieve greenfield run-off rates and demonstrate how all opportunities to minimise site run-off have been taken.*

2.3 London Plan Policy SI 12 deals with flood risk management and states:

*A. Current and expected flood risk from all sources (as defined in paragraph 9.2.12) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.*

*B. Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should cooperate and jointly address cross-boundary flood risk issues including with authorities outside London.*

*C. Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.*

*D. Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.*

*E. Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.*

*F. Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.*

*G. Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage*

2.4 The National Planning Policy Framework contains the following relevant paragraphs:

159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

167. 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 such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;

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.

168. Applications for some minor development and changes of use<sup>56</sup> should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 55.

Footnote 55 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

Footnote 56 This includes householder development, small non-residential extensions (with a footprint of less than 250m<sup>2</sup>) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.



3.0 FLOOD RISK ASSESSMENT

3.1 As demonstrated in the mapping below the site has a very low risk of flooding by rivers and the sea and surface water.

Flood risk

Extent of flooding

Location

Enter a place or postcode



Extent of flooding from rivers or the sea

- High
- Medium
- Low
- Very low
- Location you selected



Flood risk

Extent of flooding

Location

Enter a place or postcode



Extent of flooding from surface water

● High ● Medium ● Low ○ Very low ⊕ Location you selected

- 3.2 It should be recognised that locating vulnerable uses outside of areas of surface water flood risk Hotspots is difficult to achieve. However, all development must be safe from surface water flooding and, unless there are practical reasons for not doing so Sustainable Urban Drainage Systems should be used to manage surface water run off.
- 3.3 Flat 1, 8 Charles Street is not categorised as a highly vulnerable land use as it is not a self-contained basement dwelling and benefits from access at ground floor level. The use of the property as residential is longstanding and there is no evidence of past flooding, as demonstrated by the EA mapping. Furthermore, given the scope of the application and the listed nature of the building there is not an opportunity to incorporate a Sustainable Urban Drainage Systems.
- 3.4 On this basis, the policy requirements as set out above are met.



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