

Thomas Weaver  
London Borough of Southwark  
Development Control  
PO Box 64529  
LONDON  
SE1P 5LX

**Our ref:** SL/2022/121698/01-L01  
**Your ref:** 21/AP/4297  
**Date:** 25 January 2022

Dear Thomas Weaver

**Demolition of existing building and structures and erection of a part 2, part 7, part 14, and part 16 storey plus basement development comprising 1,733SQM (GIA) of space for class e employment use and/or community health hub and/or class F1(A) education use and 233 purpose-built student residential rooms with associated amenity space and public realm works, car and cycle parking, and ancillary infrastructure**

**Avonmouth House 6 Avonmouth Street London Southwark SE1 6NX**

Thank you for consulting us on this application.

We have **no objection** to the proposed development as submitted, but have the following advice.

#### **Flood risk**

The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling (December 2017) shows that the site is at risk if there were to be a breach in the defences.

The inclusion of inappropriate development according to Table 3 of the national Planning Practice Guidance, the absence of a Flood Risk Assessment (FRA) or the submission of an inadequate FRA could technically be reasons for refusal of the scheme. However, we are taking a pragmatic approach and do not object to this application.

Please note that our advice is based upon the tidal and/or fluvial flood risk to the site. Other sources of flooding to the site, such as surface water, also need to be considered. We recommend that the applicant refers to the Strategic Flood Risk

Assessment (SFRA) for the borough and seeks advice from the Lead Local Flood Authority (LLFA) and emergency planning teams, where appropriate.

**Advice to the applicant and Local Planning Authority**

The proposal seeks to introduce new dwellings on the second floor of the development. This will be above the 2100 breach flood level. Therefore we will not object, despite only one flood level being given for the entire site. However, we advise that the applicant submit an updated FRA, inclusive of flood levels from across the site, to consider other sources of flooding and outline emergency evacuation plans.

Under our remit as a statutory consultee, we are commenting on fluvial and tidal risk only. We recommend the Local Planning Authority assess whether an updated FRA should be submitted with respect to other sources of flooding and emergency planning, which fall within their remit.

Our local Customers & Engagement team are able to provide any relevant flooding information that we have available, such as flood maps and modelled flood levels to be used within the FRA. For most sites, applicants should request modelled data for this purpose. All flood data requests are free. To request any flood risk data, please email [KSLE@environment-agency.gov.uk](mailto:KSLE@environment-agency.gov.uk), or telephone 03708 506 506 and ask for the Kent & South London Customers & Engagement team.

If you have any questions, please contact the Kent & South London Sustainable Places team at [kslplanning@environment-agency.gov.uk](mailto:kslplanning@environment-agency.gov.uk), quoting our reference number.

Yours sincerely

**Mr Morgan Haringman**  
**Planning Advisor**

Direct e-mail [KSLPlanning@environment-agency.gov.uk](mailto:KSLPlanning@environment-agency.gov.uk)