

Ref: P0754.25

Andrew Thornley
Principal Planning Officer
London Borough of Havering | Development
Planning & Building Control
Town Hall,
Main Road,
Romford,
RM1 3BB

10 December 2025

Dear Andrew,

Angel Way Multi-Storey Car park

I refer to the LLFA's response of the 15th of October 2025 in relation to the above project. This letter looks to address the issue raised by the Planning Officer concerning the River Rom naturalisation on site. This submission aims to provide further clarification in order to satisfy the LLFA's concern. Please see our response below. This is broken down in sections to ensure that all issues are addressed:

Planning Officer Comments

"Binnies are unable to review any revised flood modelling data as it falls outside of their remit, which is not as a consultee but as an independent consultant appointed for the wider River Rom naturalisation aims.

Having said that, and having discussed the proposal with managers within the team, we think it is imperative that the proposal is revised so that the river can be naturalised and made visible as it runs through the site, and we believe there is a way this can be achieved without increasing flood risk on other sites, by creating additional volume for the river within the scheme, as part of a naturalisation process.

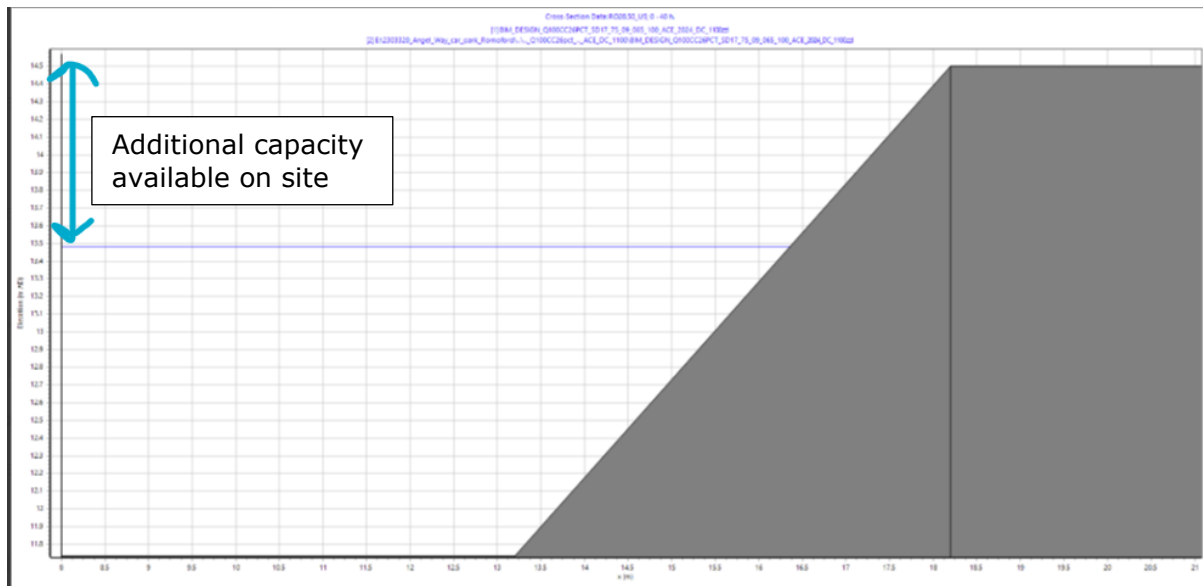
I strongly encourage you to review this element of the scheme."

- 1. Planning Officer's Comment - "We believe there is a way this can be achieved without increasing flood risk on other sites, by creating additional volume for the river within the scheme, as part of a naturalisation process."**

Response - There is enough capacity within the scheme to accommodate model water. The section below shows a cross section through the proposed deculverted part of the site and the predicted water level. As you can see there is capacity within the deculverted section to store more water, but water is not getting through the culvert upstream (immediately to the north of the site).

[Subject]

[Subject]



Therefore, creating additional volume for the river within the scheme will not provide any benefits or decrease flood risk off site.

The Ardent Hydraulic Modelling Report (Ref. 2303320-R04) confirms that "The post-development model resulted in the same increases upstream while the open channel capacity within the Angel Way site was not utilised fully. Therefore, the increases upstream were not connected to the width of the proposed open channel on the Angel Way site but were a result of the culverted section to the north of the site."

When water is moving through a culvert experiences more resistance compared to an open channel. This slows it down and causes water to pile up upstream. Also, as water enters the culvert, there's often turbulence and energy loss. As a result, there is not enough water going through the existing culvert to the north of the site in order to take up all the volume we have created within the open section of the scheme. Water levels increase upstream although there is more capacity within the naturalised section on site.

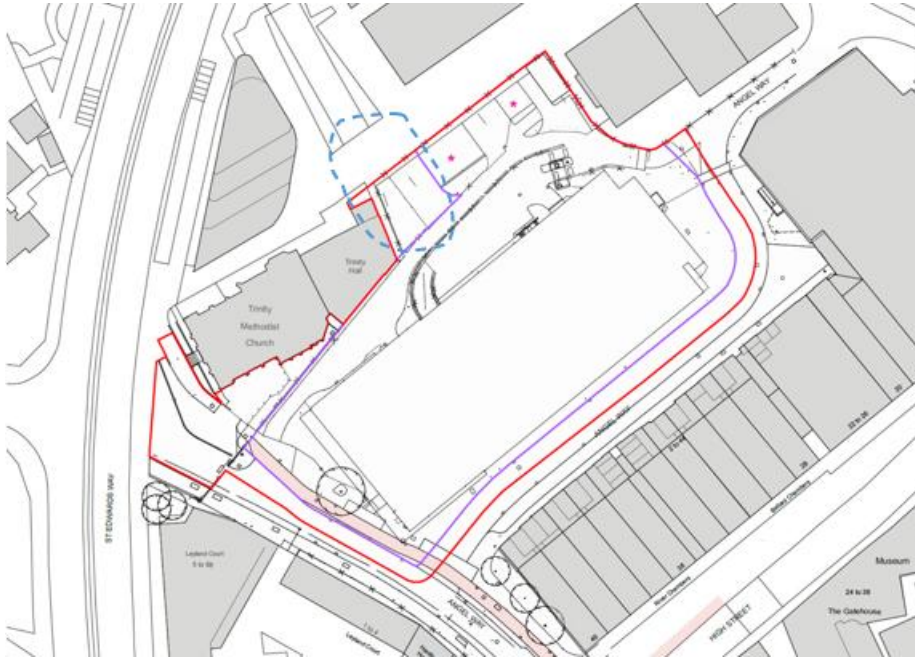
2. Planning Officer's Comment - I strongly encourage you to review this element of the scheme

Response – We have reviewed this element of the scheme and undertaken additional sensitivity testing. As mentioned above the river within the scheme has capacity. Based on Ardent Hydraulic Modelling Report (Ref. 2303320-R04) the culverted section to the north of the site is the reason for the increased water levels off site.

Therefore, additional sensitivity testing was undertaken to confirm this. The model was run with an increased in size upstream culvert, however, even with the larger culvert the water levels upstream still increased significantly while the water levels within the site remained the same.

The model was then run again with the upstream culvert removed and the outputs showed that the water levels upstream remain very similar to the baseline scenario while the water levels on site increased only by 3mm.

Therefore, to avoid any off-site site impacts and for naturalisation on site to be achieved the application site requires considering the removal of the culvert within both the Zog development and the Church land at the rear of Trinity Hall (circled below) as we know this is the structure causing the increases upstream through a review of the modelling outputs. The Zog land is currently part of their pedestrian routes east-west and the Church land comprises car parking spaces, none of which the applicant controls.



The removal of the off-site culvert is not within the control (i.e. land ownership) of either MLH or LBH and it is not within MLH's power to undertake such works. The Council could pursue the works through CPO, but otherwise MLH has no power to deliver the removal of the off-site culvert.

We understand that the naturalisation of the river Rom is a strategic objective of the council and we have undertaken extensive modelling work to achieve this aspiration however the off site impacts make the naturalisation unachievable. The environment Agency will not accept any increase in flood risk off site.

I trust the above and enclosed information is clear; however, should you require any additional information please do not hesitate to contact me. We are happy to provide all the models on request

Yours faithfully

Georgia Athanasia

Georgia Athanasia
Project Associate

Head Office: Third Floor, The Hallmark Building, 52-56 Leadenhall Street, London EC3M 5JE | 020 7680 4088

Offices also in Suffolk, Essex, Nottingham, Kent, Bristol, Edinburgh, Manchester

Head Office: Third Floor, The Hallmark Building, 52-56 Leadenhall Street, London EC3M 5JE | 020 7680 4088

Offices also in Suffolk, Essex, Nottingham, Kent, Bristol, Edinburgh, Manchester