

Old Oak and Park Royal Local Plan examination

Agenda Session 12: Sustainable Drainage Systems

Participants: Inspector, Corporation, Grand Union Alliance,

Summary of issues

- 1 Whether the Plan's policies and proposals for Sustainable Drainage Systems (SUDS) would be effective (derived from the twelfth Key Issue of table 7 of Key document 5 identified at Regulation 19(2) stage, representation EU3/14 from Grand Union Alliance and Wells House Road RA at Regulation 1991) stage and Inspector's Q) in the light of the following points (summarised from representations made at Regulation 19(1) and 19(2) stage)
 - (a) Policy wording should be provided for SuDs. Policy should reinstate SuDs guidance. Query the downgrading in importance of strategic SuDS in the sustainable drainage hierarchy. The justification for this is to align with the Utilities Study, but this study has not been updated since 2017. Reference to greenfield run-off rates should be added to the supporting text to reinforce the policy.
 - (b) The Local Plan should prioritise strategic SuDS and set out clearer rate flow guidance for attenuation measures.
 - (c) There is a lack of space for strategic SuDS and this needs to be resolved to address flood issues. Further consideration should be given to how off-site strategic attenuation measures will be delivered, in particular the difficulties with integrated SuDS in public highway and subsequent adoption issues.
 - (d) The hierarchy set out in Policy EU3-b) should be revised to be consistent with the London Plan hierarchy and highlight the importance of rainwater harvesting and landscape based SuDS above discharge or surface water to the Grand Union Canal. The hierarchy also conflicts with recommendations of the IWMS, Borough SWMPs and the TRBM Plan.
 - (e) If strategic SuDS that include use of canal and Wormwood Scrubs is not achieved cost on individual plots will be very high.
 - (f) SUDS is just one way the Scrubs can contribute to Climate change resilience. Its strategic value should be in dealing with on-site flooding issues not receiving run off from other sites.

- (g) A reference should be included to SuDS tree pits being used where possible to maximise their water management potential.
- (h) Currently while greenfield runoff rates are sought it is often argued that it is technically impractical to reduce surface water flows below 5 l/s as this causes blockages. However, the latest CIRIA SuDS Manual justifies that flow rates can be restricted to 2 l/s. Policy and/or supporting text should be revised to reflect this.

The Corporation's response (The following summarises responses made by OPDC at regulation 19(1) and 19(2) stages)

OPDC are working with CRT and CRT have responded positively to this policy. OPDC will do everything possible to ensure the development is viable without compromising the standards set out in the Local Plan. Achieving greenfield runoff rates is imperative as the sewer network is at capacity and the statutory undertaker has indicated they cannot provide any more capacity. As additional sewage will be generated through the development, rain water will have to be diverted from sewers and treated on site to compensate for the additional flow of sewage.

OPDC officers consider that provision of strategic SuDS has been considered. SuDS will be integrated onto sites, into the canal where appropriate and subject to agreement with the CRT and into streets and open space provision. Policy EU3 provides guidance for SuDS. As set out in Policy EU3, strategic SuDS incorporated into streets, open spaces and other areas of public realm will form part of OPDC's approach to managing surface water run-off. The London Plan requires water to be treated as close to source as possible, so on-plot solutions are prioritised before strategic SuDS are considered.

The hierarchy in the previous draft Local Plan was not fully consistent with either the IWMS or the findings of the 2017 Utilities Study. The revision to the hierarchy in the second revised draft Local Plan is intended to address this. Prioritising on-site measures for addressing surface water run-off conforms with the London Plan requirement to manage surface water run-off as close to source as possible. The hierarchy as set out in Policy EU3 reflects the particular context of the OPDC area and type and form of development to be delivered. Policy EU3 is clear that proposals should not exceed greenfield rates of surface water run-off.

The Local Plan is supported by, and reflects the recommendations of, a detailed Integrated Water Management Strategy (IWMS) and Utilities Study. The IWMS was jointly commissioned with the GLA who support its outputs. The studies have assessed the need to manage surface water drainage in the locally specific circumstances of the OPDC area, and this is

reflected in the hierarchy set out in the Policy EU3. The hierarchy set out in the London Plan reflect a pan London context, and recommends that locally specific circumstances need to be considered in implementing drainage strategies. The hierarchy in Policy EU3 reflects the locally specific context of the OPDC area and the type of development set to delivered, and conforms the London Plan requirement to address surface water run-off as close to source as possible. Separately in Policy EU3, proposals are required to maximise the efficient use of water by delivering on-site water recycling technologies where these are shown to be viable.

The potential for delivering strategic SuDS on to Wormwood Scrubs as sensitive interventions will only be necessary if identified to be required and agreed by the Trust.

OPDC considers rate flow guidance to be too detailed a matter to state in the Local Plan. The requirement to achieve greenfield run-off rates for a 1-100 + 40% climate change event are clearly stipulated in the policy. Policy EU3 requires developments to provide attenuation that will achieve greenfield run-off rates during a 1 in a 100 year storm plus 40% climate change allowance. Referencing specific flow rates is a level of detail not appropriate for a strategic planning document. OPDC will continue to work closely with Thames Water on the detailed design of SuDS in the OPDC area through its infrastructure delivery programme.

Referencing specific SuDS features such as tree pits would be a level of detail not appropriate for inclusion in a Local Plan, but may be appropriate for future supplementary planning guidance.

Information on how off-site strategic attenuation measures will be delivered and criteria for their adoption is not an appropriate level of detail for the Local Plan. Any public highways to be adopted by the local highways authority would need to be built in accordance with the relevant adoptable standards, including drainage requirements.

Matters for discussion

- 1)** Have I correctly understood the thrust of the representations?
- 2)** Is there sufficient space to provide the level of Suds required to meet the corporation's run-off objectives?
- 3)** Any other issues?

P. W. Clark

Inspector

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