

Issues and Options: Flooding meeting 1st February

Attendees: Robina Rose, Libby Kinmonth, Holly Smith and Joanna Burt

Critical Drainage Areas (CDA)

Question 1

Should the Council use the vulnerability classification of the NPPF / Planning practice guidance to restrict highly vulnerable uses (in terms of access and egress e.g. self-contained basements) in CDAs? Currently the Environment Agency restricts this type of land use in flood risk zone 3, inside the tidal breach.

Yes, unanimously.

Question 2

Should the Council require specific measures to address flood risk in CDAs? What might those measures be?

- How to address the cumulative impact of all the developments? The Strategic Environmental Assessment / Sustainability Appraisal assess the cumulative impact of the whole plan (incremental effect).
- Need to consider cumulative impacts for drainage, akin to how Construction Traffic Management Plans consider cumulative traffic impacts
- In the main website there needs to be a direct link to the emergency section to give practical help in different types of emergency. This has been discussed previously and the website team was contacted but they refused to include this in the Council's homepage. There are a series of webpages regarding flood risk but they are not in the homepage.

Flood risk protection and prevention measures

Question 1

Should the Council ask for standard flood risk measures in specific areas? Should the Council require flood risk mitigation and resilience measures (such as raising threshold/floor levels, protection of light wells and basement entrances, raising electrical sockets, etc) in areas identified in the Surface Water Management Plan at high risk of flooding?

- Refer to Thames Water's heat map showing the lack of capacity in the sewers in London. This will show that the whole area could be considered as a Critical Drainage Area.
- It is important that the impact of development in Critical Drainage Areas (CDA) is not diluted. Whereas the whole Borough is at flood risk, the CDAs are more important.

Question 2

Should the Council require information about how these measures will be maintained to ensure they will be operational during a flooding event?

- No, as it is in the owners' interest to maintain them.
- How about absentee owners?
- Doing this will mean too much work for the Council to achieve the desired outcome.

Question 3

Should the Council include a policy about the protection and maintenance of flood defences and flood risk assets?

- Communal gardens could be designated as a flood risk management asset (under the Flood and Water Management Act 2010) and be included in the Lead Local Flood Authority register. This type of assets includes those structures or features which, in the opinion of the authority, are likely to have a significant effect on a flood risk in its area. The register will record of information about each of those structures or features, including information about ownership and state of repair.
- The problem with this type of assets is not building them but managing them.
- The Local Plan should make reference to the merits of trees as acting as sustainable drainage systems. The loss of trees is important.
- Should trees, communal and garden squares be registered as SuDS assets?

Question 4

Should the policy cover access and egress and emergency exit routes to ensure development in high risk areas is protected from flooding?

- There is no need for this as Flood Risk Assessments submitted with planning applications already cover access and egress.

Question 5

The maps in the Surface Water Management Plan show the possibility of surface water flood depth after a 1 in a 100 year storm event. Should the Council use a minimum depth threshold to require flood protection and resilience measures? Will a depth of 0.5m or deeper be an appropriate threshold?

- N/A

Question 6

Should the Council refer to the importance of addressing flood risk and surface and foul water run-off from upstream development (White City, Old Oak Common and Park Royal, etc) which could have a potential effect in the capacity of the sewer system?

- Yes, the Council is already doing this.

Issue 2: Surface water run-off and SuDS

Question 1

Should the Council specify the percentage improvement required in relation to greenfield runoff rate and different storm events? Or should the Council address only impermeable surfaces (not just in front gardens but any new impermeable surfaces)? Should the Council put an emphasis on requiring the most sustainable SuDS, the need to maximise green infrastructure (links to biodiversity policy), maximise water quality and provide amenity value?

- Could the Council use an Article 4 direction to prevent non-permeable surfaces in back gardens?
- A target of 25% is a good idea. It could be aligned with the Mayoral target in the SuDS plan.
- It is important to maintain existing green infrastructure.

- Yes, we should address all new surfaces.

Question 2

Should the Council require extra SuDS when swimming pools are proposed and/or whenever there is groundwater discharged into the sewer system?

- Yes. Also, there should be a flow control system to slow the flow and reduce the peak.
- Swimming pools should have flow control systems e.g. narrower pipes, to control the release of water.

Question 3

To ensure SuDS are maintained, should the Council include a policy to require maintenance schedules?

- Is the maintenance of SuDS mentioned in Land Charges? If conditions for maintenance are breached then enforcement action should be taken.

Question 4

Should the Council use DEFRA SuDS non-statutory standards or adopt its own standards?

- Leave it to the Council.

Question 5

Should the Council specify what information regarding the SuDS should be provided (i.e, construction, maintenance, ownership, etc)?

- Can the Council do spot checks? There is not enough man power and resources to check completion of developments.

Question 6

Should the Council include a policy to support retrofitting existing buildings with SuDS when an associated planning permission is required, even if the proposal will not have direct drainage implications?

- No, too onerous.

Question 7

Should the Council require permeable surfaces instead of impermeable surfaces when hard surfaces are proposed in any garden / landscaped areas?

- Yes. The Council should be more proactive regarding article 4 directions, so it is no longer permitted development.

Question 8

Should the Council include a separate policy for minor and for major applications in relation to the provision of SuDS? Should the Council require the use of the SuDS tool and if so review the tool to that effect?

- Refer to the London Plan requirement for major applications.

Issue 3: Water infrastructure projects

Option 1

The Council should not introduce a general policy on flooding and drainage infrastructure provision or upgrade works and instead use its existing wider Local Plan policies to determine any such applications.

- Refer to the policies which will be used to deal with this type of development.

Option 2

The Council should introduce a general policy on flooding and drainage infrastructure provision or upgrade works, against which any future proposals could be determined.

- Infrastructure provision is ongoing. Flood risk could come back. There should be a mention to all the impacts of the developments within the Counters Creek catchment.
- There could be a statement rather than a policy. Need to work collaboratively with different stakeholders and neighbouring boroughs as the Council has done with the Thames Tideway Tunnel and the Counters Creek.

Do you have any other comments, issues or options (reasonable alternatives) you would like to raise regarding this section?

- Include the following information in the evidence base:
 - ✓ How tree root system can soak water
 - ✓ Report from the Independent Advisory Group (Thames Water)
- Add after figure 14.2 in the document, another map with surface water information and the Thames Water map showing the sewerage capacity.