

M73 written statement from Just Space 2718

Sustainable Drainage

M73. Would Policy SI13 provide a justified and effective approach to sustainable drainage in London?

To be a more justified and effective approach, greater prominence should be given to the 2016 London Sustainable Drainage Action Plan (LSDAP) in policy. Para 9.13.4's reference to "making the drainage system work in a more natural way with a particular emphasis on retrofitting" is insufficient. The LSDAP has provided a comprehensive overview to the importance of sustainable drainage systems in London. In particular, it focuses on introducing a wide range of sustainable drainage techniques rather than management practices. With its clear preference for green infrastructure sustainable drainage rather than hard engineering sustainable drainage, it would bring justification to why Policy clause B Minor Modification expresses a "preference for green over grey" (see answer to b) below). It is encouraging that while the LSDAP seeks to set a long-term strategy for London's sustainable drainage (i.e. for 20 years), shorter-term action goals have been set for the first 5 years with a commitment to measure and report progress annually. This would give a better degree of clarity on what the policy is to achieve as presently clause A is simply an "aim".

The LSDAP has the merit of categorising actions into broad goals in partnership with the boroughs and requirements for different land-use sectors. It has been helpful that the lead organisation (usually GLA), partners and timescale have been offered. Lists of the likely sustainable drainage options and opportunities to implement sustainable drainage also have been provided in each of the land-use sectors.

Nevertheless, the LSDAP would need to be updated to align closely with the draft new London Plan: as 'blue spaces' have been omitted as green infrastructure. This is despite the fact that blue spaces/ infrastructure have been featured as sustainable drainage techniques in Table 1 (for example, blue roofs, detention basin/ponds, discharge to tidal river/ dock/ canals (p.9). The inclusion/consideration of how natural waterways are linked to this network of Sustainable drainage is not mentioned across the LSDAP. The phraseology of Lead and Partners suggests a hierarchical, top-down approach, rather than collaboration. Actions need updating as they are mostly set for 2017. Moreover, guidance and good practice examples of sustainable drainage applicable to [the different land-use] sectors was promised for 2017.

In addition to greater prominence for the LSDAP, to have a more justified and effective approach, as advocated in the Just Space response of March 2018, an overarching Blue-Green strategic approach should have been adopted in the draft new London Plan. Certainly, adopting this concept at a city level is more challenging than incorporating it into individual project. But the utilization of the full range of

ecosystem services with nature-based solutions, holistically, to tackle existing and emerging challenges in the urban environment would positively assist the achievement of sustainable development. A clear framework would provide the necessary coordination, not only encouraging practices but also setting standards. A Blue-Green City is not only about the physical environment, but also about creating a democratic mechanism for this vision to achieve the multi-dimensional benefits*. Interaction between users, developers, planners and policy makers are essential in maximizing the benefits of a Blue-Green Strategy and the achievement of sustainable development. The draft new London Plan has not availed of this better approach.

*This was a finding of a fact-finding study of Portland, Oregon¹ in a Blue-Green Cities Research Project

In particular:

a) Would it provide a justified and effective strategic framework for the preparation of local plans?

Policy SI 13A has adapted the similar part, Policy 5.13B of the current London Plan. However, it is not as explicit as to the consequences for boroughs and their Local Plans. The current Policy is quite clear that “actions and policy approaches” for (surface water management) risk reduction should be integral to local plan-making. It is regrettable that this clarity and direction is diminished. (Policy SI 12B uses the phrase “actions and policy approaches”). Although, it should be recognised that the proposed Minor Modification to SI 13A is welcomed as it goes beyond existing areas of risk. This takes on board that issues are changing over time with climate change, more development etc.

The Mayoral Old Oak & Park Royal Development Corporation (OPDC) in its draft Local Plan will not tackle flood risk comprehensively and systematically, but will rely on ad hoc development-led basis which is likely to leave parts of Park Royal, ‘London’s larder’ vulnerable. A more strategic approach to de-risking here and elsewhere should be sought by the draft new London Plan.

Recommend: that existing Policy SI 13B be re-expressed in Policy SI 13.

b) Would it provide appropriate, justified and effective guidance on development management matters? In particular, what is the justification for the drainage hierarchy as set out in Policy SI13B? Would it be appropriate, justified and would it be effective?

The proposed drainage hierarchy represents an improvement on the current London Plan’s one in Policy 5.13A and is generally supported. However, the expression of

¹ [The Blue-Green Cities Research Project was led by University of Nottingham 2013-16](#)

“preference” for green over grey features lacks the degree of certainty normally associated with policy wording. There are other aspects that need reflecting on. Interestingly, the existing London Plan’s hierarchy seems to accord more significance to the role of blue spaces in SuDS. Namely, hierarchy #3 in the current Plan refers to rainwater attenuation in ponds/open water features for gradual release whereas the draft Plan Minor Modification replaces “open water features” by “green infrastructure features”, specifically mentioning green roofs and rain gardens as examples. In fact, green infrastructure, as with rain gardens, for example, do incorporate blue spaces in their construction as is evident from international case studies, particularly in Australia. Distinguishing between blue and green separately is not helpful if an integrated sustainable urban drainage that takes into account locational contexts is to be achieved.

c) What is the justification for developments to achieve ‘green field run off rates’? Is this based on robust evidence? Would this be an effective approach to sustainable drainage in London?

To achieve ‘greenfield run-off rates’ seems to be an admirable aim. However, quite what is the relevant ‘greenfield run-off rate’ is hard to deduce: this can vary over time with the passing seasons, changing weather and climate and, among other things, is reflective of topography, soil, sub-soil and geological conditions. The draft Local Plan by the Mayoral Old Oak & Park Royal Development Corporation (OPDC) offers the definition “The rate of rainwater runoff which takes place before a site is developed”². For this local plan area, most of it is industrial estates and railway lands, much of which is to be comprehensively developed. The use of ‘greenfield’ in this context is likely to be confusing. There may be alternative forms of words that would be less contradictory on first reading, such as ‘water neutrality’ for example: to reduce a development’s water footprint and any negative externalities as much as reasonably possible and remaining impacts are fully compensated through off-setting. That said such a term may also give rise to interpretation issues; off-setting might not be feasible for water infrastructure issues can be area wide; and not necessarily fully achieve the objective of the ‘drainage hierarchy’ of Policy clause B.

Nevertheless there is a need for developments to deal with their own consequences and, therefore, an appropriate form of words for Policy clause B. There are parts of London where the sewer system has no capacity to accept increased flows – from development and from changing weather patterns and climate change, such as more intense downpours. “London faces a drinking water shortfall, but at the same time problems of excess water: sewer overflows and flood risk in the event of excess

² [p255 OPDC draft Local Plan Glossary](#)

rainfall”³. For instance, Counters Creek combined sewer, more or less running down alongside the western boundary of the RB of Kensington & Chelsea from the Old Oak and Kensal Canal Side Opportunity Areas has no capacity to accept increased flows⁴. Note the Minor Modification deletion from draft new London Plan para 9.5.10, that “Thames Water is also planning a major sewer tunnel in the Counters Creek catchment of west London”.

³ [London Assembly Environment Committee ‘Growing, growing, Gone’ Report March 2016](#)

⁴ [See para 6.36 OPDC draft Local Plan Reg19\(2\) chapter 6 Environment & Utilities](#)