



# Requirements and aspirations for SuDS in Hammersmith & Fulham

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(and Lead Local Flood Authority Officer)

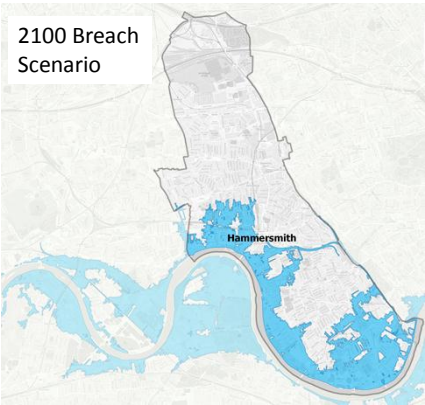
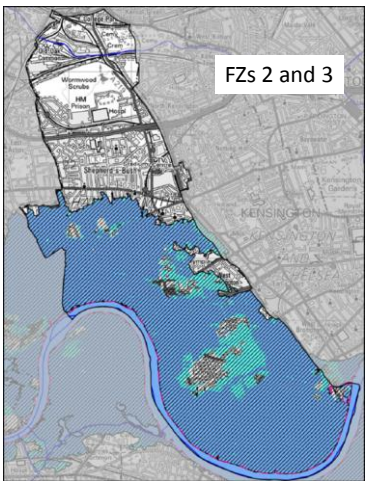


## Presentation Topics

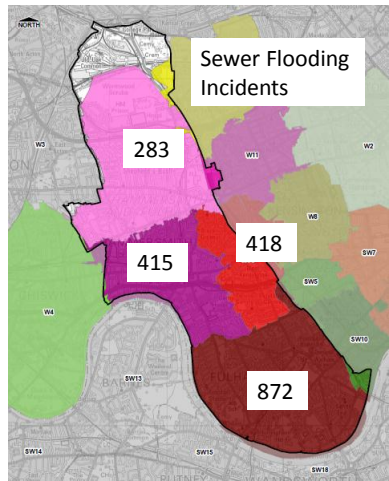
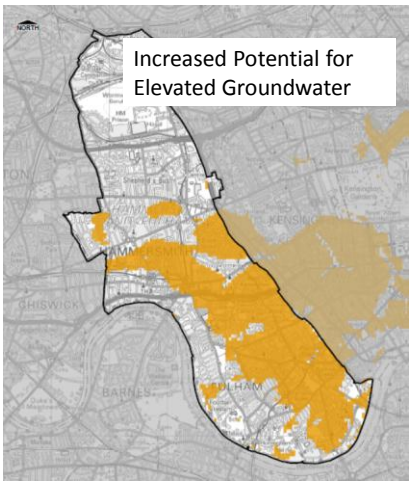
- Part 1 – Discuss flood risks in H&F and the LLFA approach to getting SuDS measures integrated into major developments
- Part 2 – Comment on the LLFA process for the Landmark House case study



# Tidal Flood Risks

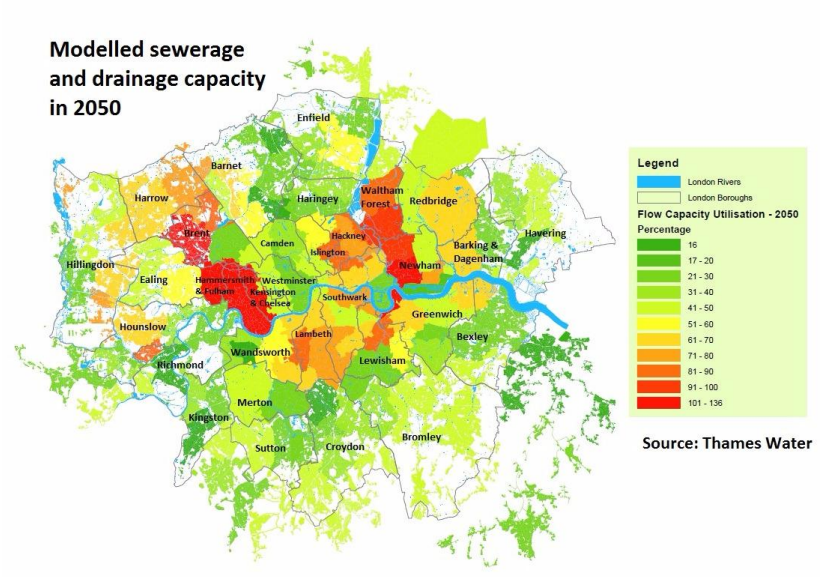


# Groundwater and Sewer Flood Risks

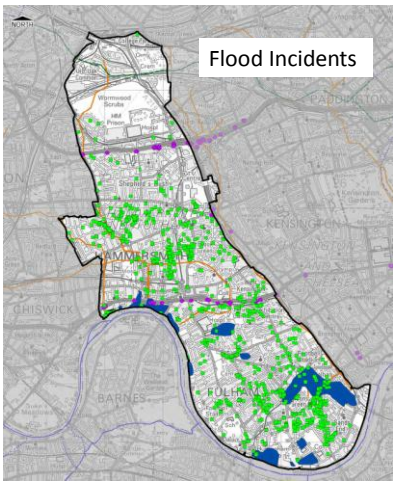
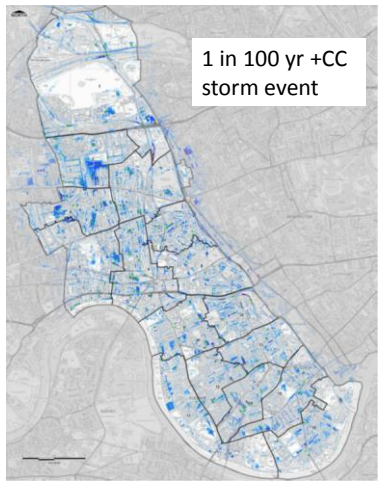




# Combined Sewer Capacity Issues



# Surface Water Flood Risks





## Flood Risk Assessment Stats

- Application referrals for flood risk comments

September	August	July
109	162	117

- 2017 – 1,195 consultation requests so far
- 2016 – 1,474 applications commented on
- Major applications assessed by the LLFA:
  - 15 in the last 3 months
  - 79 in 2016 (many of these are pre-apps)



## Lead Local Flood Authority

- Consists of 2 officers:
  - Lead Environment Policy Officer (Planning)
  - Flood Risk Manager (Highways)
- Weekly meetings to discuss applications and agree comment on SuDS Strategies
- LLFA gets 3 weeks to submit comments – deadline met in majority of cases
- Most frequent response is to object and require further information. Detailed comments and advice provided.



# Local Planning Policy

- We have a current Local Plan Policy that is in line with the requirements of the London Plan
- The new Local Plan Policy due to be adopted in January 2018
  - All major developments must implement SuDS to enable a reduction in peak run-off to greenfield run-off rates (for a range of storm events) and maximise attenuation
- New planning guidance on SuDS under development







## Why we object to SuDS Strategies

- *“The site is already 100% impermeable so why are SuDS necessary?”*
- London Plan Drainage Hierarchy not followed
- Rainwater harvesting not considered
- Too much emphasis on storage tanks
- Infiltration ruled out too early and use of Building Regs 5m rule to justify not just exclusion of soakaways but all forms of infiltration
- Attenuation levels achieved are too low (50% is not a design target)
- Final discharges are too high (aim for greenfield not 5l/s); multiple discharge points are planned but not clearly identified
- Benefits of above-ground SuDS measures not considered
- Designing just for the 1 in 100 yr storm and not more frequent events
- Inconsistencies between the FRA, the SuDS Strategy, the Sustainability Statement and the site Plans

## How to get your SuDS Strategy Approved



- Make use of the pre-app process and get advice on the LLFA requirements for the site
- Follow the London Plan Drainage Hierarchy
- Maximise above-ground SuDS measures including rainwater harvesting and infiltration methods where possible.
- Once above-ground measures have been maximised, then consider if underground storage is required
- Minimise final discharges to greenfield rates
- Maximise attenuation achieved on the site
- Provide maintenance information for all SuDS measures
- Provide plans and details of the SuDS measures
- We want as much detail up front at application stage so we can condition the implementation of the SuDS scheme as outlined where possible
- **READ THE POLICIES & GUIDANCE, DESIGN A SCHEME THAT COMPLIES WITH THEM AND TALK TO US ABOUT YOUR PROPOSALS**



## Part 1 - Summary

- H&F has serious problems in terms of surface water flooding
- The planning system, through the LLFA, needs to ensure that development opportunities are used to get SuDS measure implemented wherever possible
- SuDS Strategies must maximise attenuation, minimise final discharges and use above-ground measures that not only provide flood risk benefits but other benefits for biodiversity, water quality, water efficiency etc



## Part 2

- Comment on the LLFA process for the Landmark House Application case study



# Landmark House



# Development Proposals

- Demolish existing building
- Build a part 6, 12 and 22 storey building providing a hotel, office and retail space, as well as a cultural space
- Plan includes some public realm landscaped areas
- Basement across the entire site







## LLFA Process

- **Pre-app Stage**
  - No formal pre-app ✘
  - Brief discussion on FRA/SuDS requirements but no detailed advice provided ✔
- **Full Application Stage**
  - Validated on 25<sup>th</sup> Jan and notified to the LLFA on 31<sup>st</sup> Jan.
  - FRA carried out by Buro Happold and SuDS Strategy developed by Ramboll
  - LLFA started to assess the application in late Feb and provided comments on 2<sup>nd</sup> March.



## LLFA Comments

An **objection** was made to the SuDS Strategy:

- Not clear that the Drainage Hierarchy was followed ✘
- Attenuation was limited to 50% improvement ✘
- Greenfield rates not achieved for final discharge ✘
- Too reliant on use of the underground tank ✘
- Some alternative measures mentioned (gardens, landscaping) but no detail ✘
- Thames Water concerns were also noted as they flagged issues with lack of sewer capacity ✘

## LLFA Comments



## LLFA/Ramboll Discussions



- Detailed comments provided to the case officer who passed them onto the applicant and consultant
- Early May – email discussions began with Ramboll to discuss how the SuDS Strategy should be revised
- Meeting held to discuss proposed amendments and agree a way forward

## Revised SuDS Strategy

- Key components of the SuDS Strategy had been improved:
  - Final discharge rate lowered to 2.4 l/s ✓
  - Large increase in attenuation achieved (over 90% compared to current site) ✓
  - Rainwater harvesting now proposed ✓
  - Green roofs ✓
  - Rain gardens ✓
  - Permeable paving ✓
  - Volume of attenuation tank reduced ✓

## Next Steps

- Revised SuDS Strategy was accepted and the LLFA objection to the application was removed
- Application went to July Planning Committee with a recommendation for approval, including SuDS conditions
- We still want to see a revised SuDS Strategy prior to commencement to confirm inclusion of measures highlighted in the submitted Strategy





## Part 2 - Summary

- Large-scale redevelopment of the Landmark House site provided a good opportunity to integrate SuDS
- The original SuDS Strategy was objected to by the LLFA and revisions were required to make it policy compliant
- LLFA and Ramboll worked together to revise the Strategy and increase prioritised SuDS measures
- LLFA Objection removed and application was approved



Thank you

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