

# London Borough of Croydon comments

Page: [Policy SI12 Flood risk management](#)

Section: [N/A](#)

Under SI12 Part B, as well as the mentioned plans, we would propose that Development Plans should also use flood investigation reports prepared under Section 19 of the Flood and Water Management Act to identify areas with particular known flood issues.

Paragraph 9.12.1 contains the wording '*LLFAs..... are responsible, in particular, for..... maintaining a register of flood risk*'. We consider this wording is ambiguous and could be made clearer with regards to the responsibility of the LLFA as defined under the FWMA 2010. Under the FWMA 2010, LLFAs are responsible for maintaining a register of '*structures or features which in the opinion of the authority, are likely to have a significant effect on flood risk in its area*'. Further, as the LLFA, we maintain our own records of flooding and continue to develop an overview of local flood risks.

Page: [Policy SI13 Sustainable drainage](#)

Section: [N/A](#)

We note that the Draft New London Plan states that development proposals should aim to reach greenfield runoff rates. In the London Plan Interim response, prepared by London Councils (dated 11/01/2018), it was stated that the relevant policy in some London Councils' Local Plans did not require development proposals to aim to achieve less than greenfield runoff rates. However, the Croydon Local Plan (adopted on 27th February 2018), requires that (i) Sustainable Drainage Systems (SuDS) are utilised in all developments and (ii) developments should achieve better than greenfield runoff rates (Detailed Policy DM25.3c). Further, in line with Policy SI13 Part D, the Croydon Local Plan Detailed Policy DM25.3d states that SuDS should *“be designed to be multifunctional and incorporate sustainable drainage into landscaping and public realm to provide opportunities to improve amenity and biodiversity”* and *“achieve improvements in water quality through an sustainable drainage system management train”*.