

OPDC Response to Matter and Issue 16

Matter 16. 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 19(1) stage and Inspector's Q3)

Although I am content with the officers' response to this Matter set out in Appendices E and J to Key document 5, a Hearing session will be required if representors exercise their right to be heard.

OPDC response

- 1.1. OPDC considers that the Plan's policies and proposals for Sustainable Drainage Systems (SUDS) would be effective and sound. Local Plan policy EU3 provides guidance for Sustainable Drainage Systems (SuDS). This is supported by the comprehensive Integrated Water Management Study (document SD21). As out 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, therefore on-plot solutions are prioritised before strategic SuDS are considered.
- 1.2. The delivery of the strategic SuDs is identified in OPDC's Infrastructure Delivery Plan (document SD58). This identifies that funding sources will be drawn from developer cost/ planning contributions and/or service providers. In addition to this and in accordance with Policy DI1, OPDC has submitted a successful bid to central Government's Housing Infrastructure Fund (HIF) for £250 million, which is now at an advanced stage of assessment by HMR Treasury. This funding will allow OPDC to deliver SuDs within the Old Oak North area.
- 1.3. OPDC are working with the Canal and River Trust in developing policies and proposals in relation to the Grand Union Canal. The Trust have responded positively to this policy.
- 1.4. OPDC requires all development to achieve greenfield runoff rates and ensure there is sufficient drainage within development plots to retain a 100-year storm plus an additional 40% to take account of climate change.
- 1.5. The use of the Grand Union Canal and Wormwood Scrubs would provide additional resilience, but the proposals and policies do not rely on this to meet flow rates and they also ensure capacity in the existing sewer network is retained. In addition, the Old Oak North Development Framework Principles also identifies that the realignment of Stamford Brook Sewer may be necessary to optimise development capacity in Old Oak North. Realignment will require significant joint working between OPDC, Thames Water and landowners and may increase capacity in the sewer network.

1.6. To provide supplementary guidance to policy EU3 and reflect the detailed recommendations of the Integrated Water Management Study, OPDC will be developing place based Supplementary Planning Documents (SPDs) and a Public Realm and Green Infrastructure SPD. These will assist in providing clear guidance for the design and delivery of strategic SuDS.