

OPDC Local Plan

Statement of Common Ground

Between

Old Oak and Park Royal Development Corporation

and

London Borough of Hammersmith and Fulham

10 April 2019

1. Introduction

- 1.1. This Statement of Common Ground has been prepared between the Old Oak and Park Royal Development Corporation (OPDC) and London Borough of Hammersmith and Fulham (LBHF). It seeks to help to inform the independent examination of OPDC's Local Plan and will be submitted to the Planning Inspector.
- 1.2. It sets out where issues have been resolved and includes LBHF agreement in relation to Inspector's Question 71, 72 and 73 in relation to Policy EU3(b) i)-iii).

2. Background

- 2.1. In response to the Regulation 19(2) consultation, LBHF requested that Policy EU3 (Sustainable Drainage Systems) be amended to ensure that the Plan policies will be effective in relation to:
 - a) Issues of water shortage in the LBHF area. The borough is in an area of serious water stress defined by the Environment Agency (EA) as a region where current and future demand for household water is likely to be a high proportion of the effective rainfall which is available to meet demand.
 - b) Issues related to capacity of the combined sewer infrastructure, particularly Counters Creek, the sewer network that serves most of the Borough. Studies by Thames Water show that Counters Creek is in danger of not having the required capacity to cope with relatively frequent storm events and flows from the OPDC will increase flows into the sewer network. The impact of increasing flows will be to increase the risk of surface water and sewer flooding in the Borough.
- 2.2. OPDC agreed to make amendments which were included in the submitted [Proposed Minor Modifications Schedule](#) (KD4).
- 2.3. Subsequent to raising this issue, LBHF continued to raise the importance of OPDC's Local Plan to align further with the London Plan and LBHF drainage hierarchy. OPDC and LBHF have met to discuss these issues resulting in the below agreed proposed modifications.

3. Areas of agreement

- 3.1. LBHF agrees with the proposed minor modifications set out in table 1 below.

Table 1 Proposed Minor Modifications

Consultation reference	Policy	Agreed modification
Nos 72; LBHF	Policy EU3(b) i) – iv) related to requirement for developers to implement sustainable	b) Provide sufficient attenuation storage capacity to ensure the peak rate of surface water runoff

	drainage schemes that will adequately address the risk of flooding. OPDC proposes to amend the policy in relation to the drainage hierarchy so that it aligns with the hierarchy in the London Plan and LBHF Local Plan.	generated during rainfall events up to the 1 in 100 years plus a 40% climate change allowance, does not exceed greenfield run-off rates by applying the following hierarchy: i) providing on-site source control to attenuate on-site. The priority for on-site attenuation should be the provision of vegetated Sustainable Drainage Systems (SuDS), with other solutions, including below ground attenuation, only deemed acceptable where all vegetated options have been fully explored; and ii) Where source control SuDS features cannot achieve sufficient attenuation, delivering and/or contributing to strategic SuDS, which should be incorporated into streets, open spaces and other public realm areas; iii) delivering where appropriate and through agreement with the Canal and River Trust, outfalls to the Grand Union Canal, where the water is of an adequate quality, in accordance with the Water Framework Directive or any subsequent standards, and would not have a detrimental effect on the ecological and chemical status of waterbodies; iv) controlled release of water into the combined sewer, through agreement with the borough and Thames Water.
	Policy EU3 I i)	Maximise the efficient use of water by: i) delivering on-site water recycling technologies, including rainwater harvesting and/or greywater recycling, where these are shown to be viable; ii) for all non-residential developments, seeking to achieve the maximum score for water use in the BREEAM ratings (or an equivalent in any future nationally recognised assessment scheme); and

		iii) designing residential development to minimise the use of mains water to better the Mayor's per capita water consumption targets, where viable.
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- 3.2. These modifications have been carried out to respond to LBHF's concerns to ensure policy EU3 more closely aligns with the adopted London Plan's, Draft New London Plan's and LBHF's drainage hierarchy while continuing to reflect content of OPDC's Integrated Water Management Strategy (Section 6.3.2.).

4. Signed confirmation

- 4.1. The contents of this Statement of Common Ground are agreed for the purposes of the OPDC Local Plan Examination.

Signed on behalf of the Old Oak and Park Royal Development Corporation		
Name and position	Signature	Date
Peter Farnham Head of Planning Policy (Interim)		10/04/2019

Signed on behalf of LBHF		
Name and position	Signature	Date
David Gawthorpe Team Leader, Policy and Spatial Planning		10/04/2019