
From: Berry-Khan, Gabriel
Sent: 14 January 2021 20:55
To: McClue, Jonathan
Cc: Frost, Katherine
Subject: 2020/5774/P Murphys Yard EIS scoping - LLFA

Hi Jonathan

Please find here comments on the flood risk and drainage theme.

Flood risk

The EIS scoping report observes:

374. ... the requirement for a Flood Risk Assessment within the planning application will address the flood related risks as listed in the London Risk Register.

417. EA Surface Water Flood Maps indicate that the western portion of the site predominantly has a “very low” surface water flood risk, with annual probability greater than 1 in 1000. The eastern portion of the site has a “low risk” of surface water flooding, with an annual probability between 1 in 100 year and 1 in 1000 year. Small localised areas of the site have a medium to high risk of surface water flooding, although this is typically within the existing vehicular routes and on the periphery of the site extents.

419. From reviewing the LBC Strategic Flood Risk Assessment (SFRA)⁵⁶, it is identified that the site does lie within a Critical Drainage Area (CDA) reference Group3_003, however outside of any Local Flood Risk Zones. Whilst the “Gospel Oak” Local Flood Risk Zone is located immediately west of the site it is separated by the existing railway lines along the western boundary.

Comments:

1) Surface water flooding risks

Below: site boundary (left) and the flood risk map from the Strategic Flood risk Assessment (SFRA, right).



Although the report's observations are generally correct, it has not made reference to the historical major flooding of Highgate Road (1975 – shown orange in SFRA map extract). Insofar as the site is close to this road, it would be prudent to proceed as if the scheme were in an area at risk of flooding, in the meaning of the Camden Local Plan.

2) Flood Risk Assessment (FRA)

Given the scale and unity of the Kentish Town Framework area, the FRA exercise should be undertaken as far as possible in conjunction with the owners of neighbouring plots in the same. The measures implemented and (with/without development) overland flows will all be interlinked in effect and should be coordinated appropriately.

Sustainable drainage

The report notes that:

A SuDS appraisal exercise will be undertaken to assess the appropriateness of the full spectrum of different sustainable techniques as identified within CIRIA C753. LBC as the Lead Local Flood Authority (LLFA) require all new developments to refer to the drainage hierarchy within the Draft New London Plan and seek to achieve greenfield runoff rate discharge restriction.

The FRA, Surface Water and Foul Sewage Drainage Strategy will be informed by consultation with the key stakeholders including the EA, the LLFA and TWUL and be accompanied by a completed LBC SuDS Proforma to demonstrate compliance with Local Policy.

Through a well informed and considered design process with regard to flood risk and surface water drainage considerations, coupled with appropriate measures to manage the residual flood risk at the site following redevelopment, no likely significant effects associated with flooding and surface water drainage are anticipated.

Comments:

1) Drainage strategy

For reasons similar to those given above regarding the need for a unified FRA, we would expect to see the drainage strategy for this prospective planning application taking into account the nature and impacts of anticipated neighbouring development. As far as possible, the applicant should be asked to work with landowners and developers of adjacent plots within the Planning Framework area.

2) Sustainable drainage systems (SuDS)

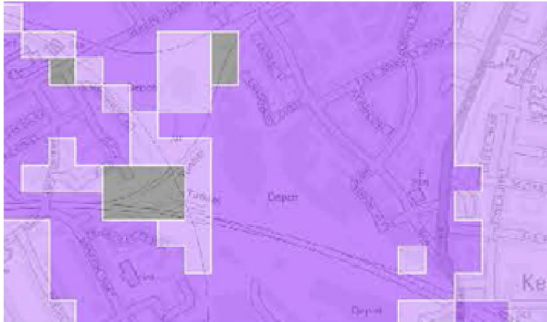
The scoping report's observations are noted and welcomed.

The size and layout of the development site naturally lends itself to landscape-type SuDS such as ponds, basins, tree pits and rain gardens. The Kentish Town Planning Framework (3.1.2) draws out the possibilities for green infrastructure and SuDS, particularly along the part of this site it calls the 'Heath Line':

The route will be landscaped to provide variety and interest along its length, responding to and defining the different spaces through the area. It should be accessible to all ages, with playable features and places to dwell. It will draw on the green character of the area this tree-lined route will have areas of planting, sustainable urban drainage and opportunities for food growing.

Alongside these we would expect to see recovery and use from blue-green roofs on the proposed new buildings, wherever feasible. Together these would be in line with Local Plan policy CC3 and the reformed drainage hierarchy found in the New London Plan.

The SFRA's soil infiltration compatibility map (below) indicates a mix across this site of very significant constraints (grey), opportunities for bespoke infiltration SuDS (darker purple), and high compatibility (lighter lilac).



As such, we would expect to see infiltration tests undertaken at representative and promising locations, prior to the planning application, as part of the work done to prepare the Drainage Strategy.

Many thanks
Gabriel

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