

Pauline Butcher
Programme Officer
Planning Inspectorate
By email: ldfprogrammeofficer@tiscali.co.uk

Date: 24 May 2017

Dear Pauline

London Borough of Hammersmith and Fulham Main Issues and Questions draft response

Thank you for consulting us with the inspectors Main Issues and Questions. Further to our conversation on the 22nd of May and letter of the same date, please see below for our full comments on this consultation. Thank you once again for your patience in this matter.

The following responses are in relation to questions that directly relate to our remit. The following are responses to question 12, 14, 15, 18 of the section 'Design, Conservation, Environmental Sustainability' (pages 13-14).

Question 12

We find the Strategic Flood Risk Assessment (SFRA) used to support the Local Plan Policy CC3 to be an adequate evidence base and consistent with national policy. The Strategic Flood Risk Assessment has not used the new climate change allowances which were introduced in February 2016. This does not affect the tidal flood risk information as this already fully incorporates the climate change allowances, it also does not affect the Flood Zones in the Borough. However for surface water flood risk modelling they have used the previous climate change allowances. We agreed that due to the timing of new climate change allowance guidance being published and the already advanced stage of the SFRA that this would be acceptable for a strategic level assessment of flood risk and advised them to refer to the new climate change allowance guidance within the SFRA site-specific recommendations or Local Plan policy to ensure that these new allowances are captured for site-specific Flood Risk Assessments.

We are in agreement with the approach to the Flood Risk Sequential Test in the local plan. The borough does not contain any areas designated as being at risk of fluvial flooding up to a 1 in 1000 year event. The main source of flooding that falls within our remit in the borough is associated with the tidal Thames. The Thames tidal defences provide protection up to a 1 in 1000 year event, we therefore consider this flood risk to be residual. We are satisfied that policy CC3 requires developments coming forward adjacent to tidal flood defences to meet the recommendations of the Thames Estuary 2100 (TE2100) Plan to ensure that the standard of defences meets the increased risk associated with climate change.

Question 14

We are satisfied the Policy RTC1 requires development to take account of actions within both the Thames River Basin Management Plan (RBMP) and TE2100 plan. These plans both implement the requirements set out in the Water Framework Directive (WFD) therefore we would not request that an explicit reference to the WFD is included in the local plan.

Question 15

We are satisfied that Policy CC6 is effective and welcome the additional wording included in the proposed minor changes to the local plan providing details of the councils

Environment Agency, Apollo Court, 2 Bishops Sq Business park, Hatfield, Herts, AL10 9EX.



evidence base for managing their waste apportionment.

Question 18

We are satisfied that issues of land contamination, remediation and water quality are acknowledged sufficiently by the Plan.

If you have any further queries regarding these comments please do not hesitate to contact us.

Yours sincerely

Edward Crome

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