

Technical Note

Project	Twickenham Riverside				
Reference	J3932-C-TN-0004				
Scope	Response to Flooding comments feedback from Richmond and Wandsworth Council				
Date	11/03/2022	Job number	J3932	Author	Guy Parker-Dennison

This note is designed to respond to comments received from Lucy Thatcher MRTPI Strategic (who is the Applications Manager (Richmond) Serving Richmond and Wandsworth Councils) on the 4th of March 2022 in relation to the Twickenham Riverside Project planning application. The intent is to provide additional clarity about the justification and constraints which led to the current design and collate information from the FRA and SUDS Report to specifically address each of the points raised. These points will be picked up in the updated Webb Yates Flood Risk Assessment (FRA) and SuDS report (J3932-C-RP-0001_11).

The sequential test does not cover:

1. **The new flood defence wall / hard and soft landscaping works to the riverside area – It is expected this would pass the sequential test on their own merits as the very purpose of the application is to improve this specific area next to the river as sought by the TAAP and there are reasonably available sites appropriate for this development. However, this must be stated, explained and justified within the FRA.**

Response

Should the statement above read “-It is expected this would pass the sequential test on their own merits as the very purpose of the application is to improve this specific area next to the river as sought by the TAAP and they are reasonably available sites appropriate for this development. However, this must be stated, explained and justified within the FRA”?

If so we can add that to the updated Webb Yates Flood Risk Assessment and SuDS report (J3932-C-RP-0001_11).

2. **The boat store – again, this could be relocated elsewhere on the site, and therefore would fail, therefore it would be expected the FRA to justify the location (and why it would not be reasonable or appropriate for the boatstore to be elsewhere on site) and emphasis the particular benefits achieved by locating the store in this location (making reference to the TAAP).**

Response

The boat store has been included as part of the wharf lane building in the report (see Table 13 Site specific Flood Risk Vulnerability Classification for the Wharf Lane building on page 38 of the FRA). For clarity we will separate it out as a separate building in the updated FRA.

3. The alternative sites section of the sequential test does not meet the requirements of the NPPF.
- Does not detail the search area, any other site allocation sites, windfall sites not in council ownership.
 - For each of the potential alternative sites, you need to state:
 - its name and address
 - whether it has been allocated in the local plan (ie identified for a specific use like housing)
 - any issues that would prevent development on the site (eg roads and that are too small) and whether these issues could be overcome
 - your estimate of its approximate capacity
 - supporting documentation about your alternative sites, eg the local plan background and evidence base documents or housing and economic land availability assessments

Response

This will be provided in the updated Webb Yates Flood Risk Assessment and SuDS report (J3932-C-RP-0001_11).

4. The LLFA recommend that the application is not approved. The 'Attenuation volume' and 'Maintenance' sections require more information

Attenuation volume:

MORE INFORMATION REQUIRED - the attenuation volume proposed (114 m³) is equal to or greater than the attenuation volume required (108 m³).

- It has been demonstrated that the site will not flood as a result of the 1 in 30 year rainfall event, that there will be no flooding of buildings as a result of events up to and including the 1 in 100 year rainfall event, and on-site flow as a result of the 1 in 100 year event with a climate change consideration will be suitably managed via overland flow and discharge to the River Thames. However, the applicant should provide further information on the pipes identified to flood in this event particularly where these are located on site and levels.

Response

- 114m³ is the actual size of the geocellular tank which typically has a 95% porosity. The effective water storage of this tank is 108m³
- Our microdrainage analysis that is in the appendix of the FRA shows that pipes will not flood for the 1:100 year plus 40% climate change rainfall event.

Maintenance:

- **MORE INFORMATION REQUIRED** - the drainage strategy includes the maintenance tasks and frequencies for each drainage component proposed. Information on who will own the maintenance tasks is required.

Response

- *The FRA states that the management of the maintenance tasks will fall under the responsibility of the freeholder or (whatever management company they appoint to maintain the drainage assets). Recommended frequencies for each drainage asset are provided as per best practice and the SuDS manual guidelines. However, the full maintenance strategy of CDP items such as the foul pump chamber would be provided by the appointed manufacturer and this is not information we would have at this early design stage of the project. As a result, we feel this is something that should form part of the planning conditions.*