

London Borough of Southwark
5th Floor, HUB 2
160 Tooley Street
London
SE1 2QH

20 July 2018
Our DTS Ref: 54987
Your Ref: 18/AP/1604 - Hybrid Outline

Dear Sir/Madam

**Re: LAND BOUNDED BY LOWER ROAD (WEST), REDRIFF ROAD (SOUTH), QUEBEC WAY (EAST),
SURREY QU, QUAYS ROAD AND CANADA WATER DOCK (NORTH), AND SITE, LONDON, GREATER
LONDON, SE16 7PJ**

Waste Comments:

Following initial investigations, Thames Water has identified an inability of the existing combined water infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position for surface water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all combined water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to sewage flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid sewer flooding and/or potential pollution incidents." The developer can request information to support the discharge of this condition by visiting the Thames Water website.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development> Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

Water Comments:

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains and have contacted the developer in an attempt to agree how the, asset will be diverted / development will be aligned. We have been unable to agree a position in the time available and as such Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water have contacted the developer in an attempt to agree a piling methodology, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Clean Water: There are a large number of developments expected in the next decades within Hampton 36 FMZ. Therefore the zone will require a set of reinforcements and pump enhancements to be put in place so the zone can supply the future demand. These reinforcements recommended during the Battersea Growth Study have been outlined in the Thames Water Canada Water Development Modelling Report (December 2017).

The additional demand from Canada Water development has a major impact on the local network. The current network will be able to cope with phases 1 to 3. From phase 4, it is recommended:

- to investigate a restriction on the network close to DM04452 in Elephant Lane,
- to install a new 250mm x-connection between 450mm and 9" main in Jamaica Rd,
- adjust PRVs feeding the DMA11 PMA at peak hour to reinstate initial levels of pressure,
- install through bore fire hydrant in Quebec Way to meet the necessary fire requirement.

All the points of connection and their phasing have been assumed from the use strategy maps in the Mastermap Plan. Any major change in the location of these points of connections and their associated demand might impact on local reinforcements needed.

Developer is to adhere to all recommendations made within the Thames Water modelling study and continue to work with Thames Water Developer Services throughout all phases of construction.

Waste:

Thames Water acknowledges the applicants work to date and appreciate the ongoing engagement with Thames Water which has been made over the last four years. Thames Water wishes to continue the close working partnership with the applicant throughout the proposed developments planning and design phases in order to achieve the most sustainable means of drainage for the site.

Based on the proposed discharge rates (surface water and the increase in foul) we have no capacity concerns in the combined sewer network during high return period events (e.g. 1 in 100 year, as used in the drainage strategy). However, we have some capacity concerns in the combined sewer network during low return period events. We note that the discharge of surface water into the docks provides a level of betterment to both the combined and surface water sewer network, and also note that due to space constraints on site it is not possible to reduce the surface water discharge rates from public realm areas any further. Our capacity concerns therefore relate to the proposed surface water runoff rate for the Plots (outline) of 438.9l/s and is based on a 50% reduction from the existing discharge rate.

The 50% reduction from existing discharge rates is the 'minimum expectation' as stated in the London Plan Sustainable Design and Construction SPG. The description of SPGs on the Mayor of London [webpage](#) also states that 'supplementary guidance is used to support statutory development plans, not as an alternative. Statements made in supplementary guidance carry less weight than those in the development plan in determining planning applications but may be considerations.' As per London Plan policy 5.13, each individual plot should therefore 'aim to achieve greenfield runoff rates' utilising SuDS, and where this is not possible, information as to why it is not possible to be provided.

We do not require a commitment to greenfield runoff rates at this outline stage for the individual plots, but reaffirm the statement made in the drainage strategy that "the potential to reduce runoff

from the outline plots to a greater extent would be further investigated at the Reserved Matters stage, when details of the proposed buildings are available". We are seeking an agreement in principle that the provision of all SuDS types across the drainage hierarchy will be thoroughly explored as the drainage strategy for each plot 'aims to achieve' greenfield runoff rates, where practically possible. Attenuation and proposed surface water discharge rates will therefore be reviewed by the LLFA and Thames Water on a plot-by-plot basis at the Reserved Matters stage.

Plot K has demonstrated this approach is feasible and realistic. Although the plots calculated greenfield runoff rate (3.2l/s) has not been achieved, the plots drainage strategy clearly demonstrates that it 'aimed to achieve' this. We understand that the incorporation of SuDS into each plot and each plots respective discharge rate is subject to detailed design, however we feel Plot K demonstrates that it is practical to achieve discharge rates very close to greenfield runoff into the public sewer.

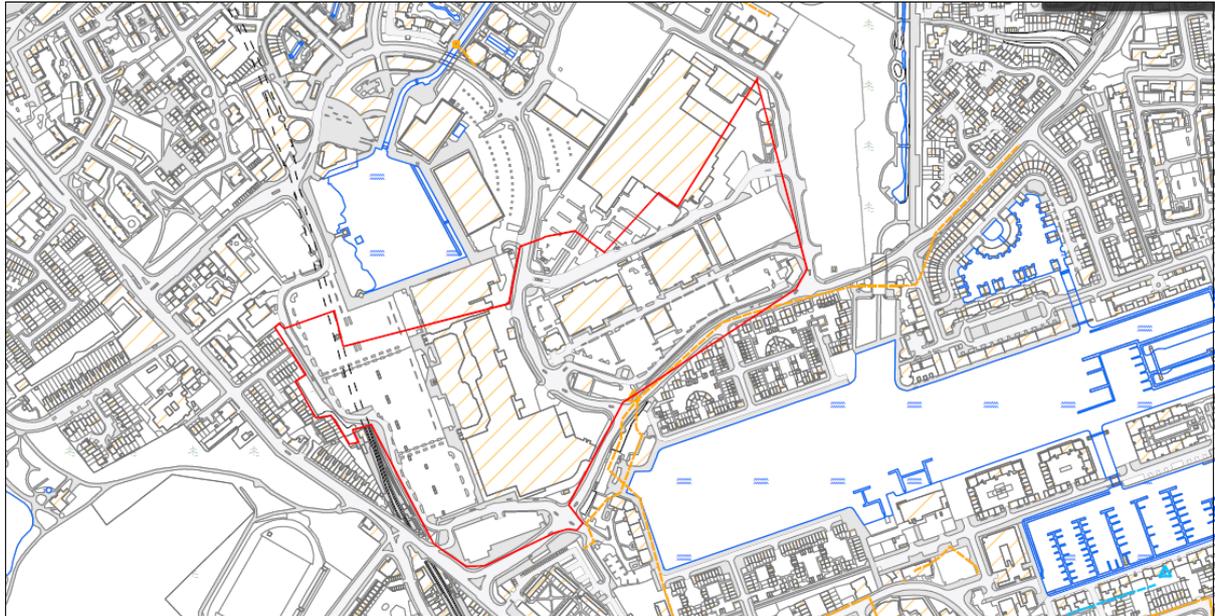
We would request that the greenfield runoff rate be agreed in principle with the LLFA Flood Risk Management team at Southwark Borough Council.

As previously discussed in meetings held with Thames Water, as part of our PR19 submission we are including a SuDS Strategy which will aim to deliver SuDS through multiple delivery mechanisms, including large scale surface water removal from combined sewer networks. Considering the timescales of the proposed development during AMP7, there is potential for the proposed development at Canada Water to meet the qualifying criteria.

Further Info: To the south east of the proposed development there are easements and wayleaves. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development. On the Map yellow dashed lines show the easements and wayleaves and the proposed development area is identified by a red outlined box.

The applicant should contact Thames Water to discuss their proposed development in more detail. All enquiries from developers in relation to proposed developments should be made to Thames Waters Developer Services team. Their contact details are as follows:

Thames Water Developer Services
Reading Mail Room
Rose Kiln Court
Rose Kiln Lane
Reading
RG2 0BY
Tel: 0800 009 3921
Email: developer.services@thameswater.co.uk



Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ
Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk