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Our Ref: WIB14596-100-170425-SM-DrainageResponse
Your Ref:

Date: 25th April 2017

Matthew Upton
Gardiner & Theobald LLP
10 South Crescent
London
WC1E 7BD

Dear Matthew,

RE: Elephant 2 – Response to Metropolitan Tabernacle concerns regarding drainage impact

I am writing in response to concerns raised the Metropolitan Tabernacle in relation to the drainage impact of the Elephant 2 scheme. These comments have been jointly prepared by Waterman and WSP, and compiled by Waterman.

In response to concerns regarding an increase in runoff rates, the following response has been prepared.

We agree it is important not to increase the overall discharge rate from the proposed development, to ensure that flood risk is not increased elsewhere. This is a requirement of the National Planning Policy Framework.

The discharge rates noted in your letter refer to the foul flows only. As the site discharges to a Thames Water combined sewer, it is important to assess foul and surface water discharge rates together.

WSP's drainage strategy (August 2016) sets out that the total existing peak surface water discharge rate from the Site is 351 l/s, and the total existing peak foul flow is 28 l/s. This gives a combined existing peak discharge of 379 l/s.

To address the increase in foul flows, the surface water discharge rate would be reduced as part of the development, to ensure that the existing peak discharge is not exceeded.

In the proposed situation, WSP's drainage strategy sets out that the peak surface water runoff from the proposed development would be restricted to 50% of the existing rate, in accordance with the Mayor's London Plan. The total proposed surface water runoff rate would therefore be 175.5 l/s. The total proposed peak foul flows are indicated to be 63 l/s. This gives a combined proposed discharge of 238.5 l/s, and is therefore a reduction in peak flows over the existing situation (379 l/s). As a result the proposed development would not adversely impact on the surrounding Thames Water drainage network, or other properties.

In response to concerns regarding the potential for the development to increase surcharging, and how the development would respond to surcharging sewers, the following response has been prepared.

Please refer to the response above regarding the overall reduction in flows to the Thames Water sewer as a result of the proposed development.

In response to capacity, WSP submitted a Pre-Development Enquiry to Thames Water to confirm the capacity of the public sewer network. Thames Water confirmed that they had capacity in their network

to accommodate the proposed flows generated by the development, and the proposed connections and discharge rates have been approved in principle.

Non-return valves would be incorporated to ensure that the Elephant 2 development itself does not flood as a result of surcharged public sewers. As described above, surface water would be attenuated for a 1 in 100 year plus climate change event, and discharged at a reduced rate. WSP's report sets out that the permitted discharge rate has been calculated using a 2 year return period. Therefore, there is a notable reduction in the peak discharge rate from the development, and an improvement in the existing peak flow rates.

In the Tabernacles response attention is drawn to the following policies:

- London Plan Policy 5.14 (Water Quality and Wastewater Infrastructure), which states that development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development.
- Core Strategy Policy 13 (High environmental standards), which requires developments to reduce flood risk by reducing surface water runoff, using SuDS and avoiding the creation of hardstanding areas;
- Saved Southwark Plan Policy 3.1 (Environmental Effects), which states planning permission will not be granted for schemes that have material adverse impact on the environment and quality of life;
- Saved Southwark Plan Policy 3.2 ('Protection of Amenity'), which states planning permission will not be granted for schemes if it causes a loss of amenity to occupiers in the surrounding area;
- NPPF Paragraph 103, which states that, when determining planning applications, LPAs should ensure flood risk is not increased elsewhere.

In response to the above policies the following response has been prepared.

Whilst there would be an increase in peak foul flow rates the peak surface water runoff rate would be reduced to 50% of the existing rate, providing a reduction in combined peak flows over the existing situation. Thames Water have also confirmed that they have capacity within their network to accommodate the proposed flows. Furthermore, the proposals include new soft landscaped areas, and green roofs as part of the proposed SuDS strategy. The proposals are therefore in line with the above policies.

I trust the above allays any concerns raised by the Metropolitan Tabernacle in relation to drainage.

Yours sincerely

A handwritten signature in black ink, appearing to read 'S McCabe'.

Sophie McCabe
Associate Director
For and On Behalf of Waterman Infrastructure & Environment Ltd