

Mr Michael Glasgow
London Borough of Southwark
Development Control
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Our ref: SL/2018/118303/01-L01
Your ref: 18/AP/1604
Date: 05 July 2018

Dear Mr Glasgow

Canada Water Masterplan - land bounded by Lower Road (West), Redriff Road (South), Quebec Way (East), Surrey Quays Road and Canada Water Dock (North), and site at Roberts Close, London SE16

Hybrid application seeking detailed planning permission for Phase 1 and outline planning permission for future phases, comprising:
Outline planning permission (all matters reserved) for the demolition of all existing structures and redevelopment to include a number of tall buildings (up to 162m AOD) and up to 656,200sqm (GEA) of floorspace comprising the following mix of uses: retail (Use Classes A1-A5), workspace (B1), hotel (C1), residential (C3), assisted living (C2), student accommodation, leisure (including a cinema) (D2), community facilities (including health and education uses) (D1), public toilets, nightclub, flexible events space, an energy centre, an interim and permanent petrol filling station, a primary electricity substation, a secondary entrance for Surrey Quays Rail Station, a Park Pavilion, landscaping including open spaces and public realm, works to the Canada Water Dock, car parking, means of access, associated infrastructure and highways works and demolition or retention with alterations of the Press Hall and Spine Building of the Printworks; and Detailed planning permission for the three Plots in Phase 1: Plot A1 (south of Surrey Quays Road and west of Deal Porters Way) to provide uses comprising retail (A1-A5), workspace (B1) and 186 residential units (C3) in a 6 and 34 storey building (129.4m AOD), plus a basement; Plot A2 (east of Lower Road and west of Canada Water Dock) to provide a leisure centre (D2), retail (A1-A5), and workspace (B1) in a 4, 5 and 6 storey building plus a basement. Plot K1 (east of Roberts Close) to provide 84 residential units (C3) in a 5 and 6 storey building. Each plot with associated car parking, cycle parking, landscaping, public realm, plant and other relevant works.

Thank you for consulting the Environment Agency on the above planning application.

We have reviewed the document 'Preliminary Environmental Risk Assessment' (PERA) by Waterman (reference WIE12886-101-R-6.3.2-PERA dated March 2018). This document covers the entire Canada Water Masterplan area and confirms the potential for ground contamination to be present from historic and current uses. These include infilled docks, timber works, industrial activities, railway lines, above and below ground hydrocarbon storage, chemicals storage and a petrol filling station. A number of abstraction wells have been identified which are proposed to be

decommissioned. Site investigations to assess the potential for ground contamination are recommended in the report. It is understood that this consultation is for detailed planning permission for Phase 1 of the redevelopment (Plots A1, A2 and K1) and outline permission for the remainder of the site.

Environment Agency position

Given the current reported site status, we consider that planning permission should only be granted to the proposed development (all plots) as submitted if the following planning conditions are imposed as set out below. We would also like to raise concerns and provide recommendations with respect to flood risk and flood mitigation measures provided in Section 1 below.

Condition 1

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A site investigation scheme, based on the PERA, to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 2) The results of the site investigation and detailed risk assessment referred to in (1) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 3) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (2) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason

For the protection of Controlled Waters. The site is located over a Secondary Aquifer and it is understood that the site may be affected by historic contamination.

Condition 2

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason

There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

Condition 3

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason

Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

Condition 4

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason

Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

Condition 5

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason

The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.

Section 1

Flood Risk

The site is situated within Flood Zones 1,2 and 3, but does benefit from being defended by the Thames Tidal Defences.

In line with Southwark's [Strategic Flood Risk Assessment](#), no new basements should be constructed within this area. However, after reviewing the proposed plans for Plot A1 and A2 and the less vulnerable use for the basement we are taking a pragmatic approach towards the development. The less vulnerable uses for the basement should be maintained for the lifetime of the development.

We note that section 3.19 of the submitted Flood Risk Assessment states that Development Zone M could potentially contain a community/health centre. According to the [Table 2 of Paragraph 066 of the National Planning Policy Framework](#), the proposal may be classed as 'more vulnerable' use although this may require confirmation from the local authority. We recommend that the finished floor levels within development zone M and E should be raised 300mm above the 2100 year maximum water level, anticipated through a breach of the River Thames defences, as stated within table *Spatial Planning & Development Control Recommendations* of the Southwark Strategic Flood Risk Assessment (SFRA), therefore minimising potential flood risk.

We note that no details have been submitted regarding what measures will be employed to improve the resilience of the development in case of a breach in the defences. We would strongly advise the inclusion of flood resilience. Information on flood resilience can be found on the following link:
http://www.planningportal.gov.uk/uploads/br/flood_performance.pdf.

We would strongly recommend to register with the Environment Agency's flood warning service, 'FloodLine', so that they may prepare themselves in case of a flood event. This can be done by calling 0345 988 1188 to register.

Please note that any evacuation plan should provide suitable access and egress from the site and would need to be approved by the Local Planning Authorities (LPA's) Emergency Planning Department (EPD).

Yours sincerely

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