

London Borough of Camden Camden Town Hall Argyle Street
Euston Road London WC1H 8EQ
30 March 2015

Our DTS Ref: 22638 Your Ref:
2014/7874/P - Mar15

Dear Sir/Madam

Re: TOWN HALL EXTENSION, ARGYLE STREET, LONDON, WC1H 8NN

Waste Comments

Water Comments

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

No impact 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. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

Non Standard Response

Thank you for your email dated 24 March 2014. We do not believe that you have received conflicting information in the two attached documents.

The first document, being the Developer Enquiry response (9 December 2014) specifies that our sewer system accommodates 51 L/s of combined flow from this site without causing significant service failures to our customers. We therefore are able to accommodate that flow rate, as we currently receive it. We would not require a developer funded impact assessment for the redevelopment if the flow rate is equal to or less than that currently received. A modelling assessment on a net decrease in flow is almost always expected to yield a "betterment" to the existing situation and so modelling it would be of limited value.

The second document, being the response to the Planning Application submitted, only takes into consideration documentation supplied to the Local Planning Authority as part of the application. Any additional documentation or knowledge that we hold is not considered because:

- Facts may have changed between our last correspondence and the submission of the planning application; and
- If it is not submitted with the Planning Application, there is no legal requirement for the site to be constructed using the agreed principles

Our concern in the submitted documentation is that surface water reduction does not meet the London Plan Policies and the generally accepted approach of 50% surface water reduction. We are confident that we can accept flow rates off this site of 51 L/s and less, but we expect developers to implement the London Plan Policy irrespective of the capacity of the sewer.

We recognise that this development is not a complete reconstruction of the site and so surface water attenuation will be restricted by the remaining structural of the building. The planning application

proposals for a combined discharge that is the same as the existing discharge, does not demonstrate any support of sustainable urban drainage principles. The more recent proposal as outlined in your email for 24 March 2014 provide us with confidence as it demonstrates a willingness to support the principles of sustainable urban drainage as outlined in the London Plan Policies.

Our position would be to support your proposed surface water reduction of 45% with a peak discharge rate of 25 L/s (for surface water flows only) into the public combined sewer. Note that as explained above we require this proposal to be included as supporting documentation for the Planning Application of this site for us to use the information to discharge a planning condition.

Yours faithfully

Development Planning Department

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