

Subject Camden Town Hall Annex Hotel Planning Application

Date 7 April 2015

Job No/Ref 235190

Supporting Document Confirming Sewer Strategy Proposal

Current Assessment

The refurbishment proposal of the existing Town Hall Annex is constrained by the characteristics of the existing building and the provision of extensive flow limiting on the whole of the rainwater collected from the site is not viable. Significant structural interventions would be required to add basement attenuation tanks for example. These would also require pumping to the sewer connection which would impose an ongoing maintenance requirement and unwanted energy use whenever it rains.

Based on the previous Camden Council building usage, the following assessment has been made of the discharge (l/s):

Foul	5.6 (based on existing office estimate using BSEN12056-2 discharge unit method)
Surface	45 (based on 75mm/hr rainfall intensity across all roof and hard paved areas)
Total Combined	50.6

Proposed Strategy

Foul	16 (based on hotel with grey water reuse using BSEN12056-2 discharge unit method)
Surface	25 (based on 83mm/hr rainfall intensity with attenuation at roof level)
Total Combined	41

The roof accommodates both blue and blue/green rooftop attenuation for a maximum practical area of the upper roof level. This limits the flow rate from the roof to approximately 6 l/s. The 8th floor terrace flow rates and surface water run-off from the landscape at ground level are based on a Category 1 rainfall intensity and a secondary overflow system.

Grey water recycling is being utilised and further reduces the foul water discharge as well as the building water consumption.

Summary

The existing surface water discharge rate is calculated to be approximately 45 l/ and through the blue/green roof level attenuation it has been possible to reduce this rate to 25l/s. This is a reduction of 45% which is very close to the GLA London Plan recommended target of 50%.

A combined discharge flow rate of 41l/s is proposed for the planning submission to reduce the estimated combined discharge to the sewer and to demonstrate support of sustainable urban drainage principles.

This provides a 20% reduction over the existing combined discharge and Thames Water have confirmed that this can be accommodated via the current sewer connection.

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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