

From: BCTAdmin@thameswater.co.uk [mailto:BCTAdmin@thameswater.co.uk]  
Sent: 14 December 2015 09:16  
To: Planning  
Subject: 3rd Party Planning Application - 2015/6455/P

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

Our DTS Ref: 337  
Your Ref: 2015/6455/P

14 December 2015

Dear Sir/Madam

Re: 156, WEST END LANE, LONDON, NW6 1SD

#### Waste Comments

Following initial investigation, Thames Water has identified an inability of the existing wastewater infrastructure to accommodate the needs of this application. Should the Local Planning Authority look to approve the application, Thames Water would like the following 'Grampian Style' condition imposed. "Development shall not commence until a drainage strategy detailing any on and/or off site drainage works, has been submitted to and approved by, the local planning authority in consultation with the sewerage undertaker. No discharge of foul or surface water from the site shall be accepted into the public system until the drainage works referred to in the strategy have been completed". Reason - The development may lead to sewage flooding; to ensure that sufficient capacity is made available to cope with the new development; and in order to avoid adverse environmental impact upon the community. Our preferred option would be for all surface water to be disposed of on site using SUDs as per policy 5.13 of the London plan. The London plan Policy 5.13 identifies a hierarchy of drainage options for surface water drainage and as such we would expect the development proposal to follow this. Policy 5.13: The Mayor will, and boroughs should, seek to ensure that surface water run-off is managed as close to its source as possible in line with the following drainage hierarchy: >Store rainwater for later use >Use infiltration techniques, such as porous surfaces in non-clay areas >Attenuate rainwater in ponds or open water features for gradual release to a watercourse >Attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse >Discharge rainwater direct to a watercourse >Discharge rainwater to a surface water drain >Discharge rainwater to the combined sewer. The use of sustainable urban drainage systems should be promoted for development unless there are practical reasons for not doing so. Such reasons may include the local ground conditions or density of development. In such cases, the developer should seek to manage as much run-off as possible on site and explore sustainable methods of managing the remainder as close as possible to the site. The Mayor will encourage multi agency collaboration (GLA Group, Environment Agency, Thames Water) to identify sustainable solutions to strategic surface water and combined sewer drainage flooding/overflows. Developers should aim to achieve

greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage. Boroughs should encourage the retention of soft landscaping in front gardens and other means of reducing or at least not increasing the amount of hard standing associated with existing homes. Should the Local Planning Authority consider the above recommendation is inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Control Department (telephone 0203 577 9998) prior to the Planning Application approval.

'We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality)."

Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

#### Water Comments

The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of

any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

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. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.

#### Supplementary Comments

As this site falls within the highly flood sensitive Counters Creek Catchment, we expect surface water to be attenuated to Greenfield run off rates as a minimum.

Yours faithfully  
Development Planning Department

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