

[REDACTED]

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**From:** [REDACTED]  
**Sent:** 10 April 2017 08:56  
**To:** Planning  
**Subject:** 3rd Party Planning Application - 2016/4460/P

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

Our DTS Ref: 54974  
Your Ref: 2016/4460/P

10 April 2017

Dear Sir/Madam

Re: 59, SOLENT ROAD, LONDON, NW6 1TY

#### 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.

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.

'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)."

#### Water Comments

On the basis of information provided, Thames Water would advise that with regard to water infrastructure capacity, we would not have any objection to the above planning application.

#### Supplementary Comments

We agree with the independent audit findings. We require the developer to engage with us to agree peak surface water discharge rates into the sewer. We would seek the surface water attenuation as far as practically possible, to mitigate the impact on the public sewer system. We would request a planning condition to facilitate agreement of these flow rates.

Yours faithfully  
Development Planning Department

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