

From: Chris Colloff [REDACTED]
Sent: 31 May 2024 16:08
To: Planning Policy Consultations
Cc: Nicky Mchugh
Subject: City Plan 2040 response
Attachments: 24.05 City-Plan-2040 representation form.pdf

Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,
Please find attached representation forms containing comments from Thames Water on the City Plan 2040 consultation.

I trust the comments will be given due consideration.

Kind regards.

Chris Colloff

Planner
[REDACTED]
[REDACTED]
[REDACTED]



It's everyone's water

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Model Representation Form for Local Plans

	Local Plan Publication Stage Representation Form	Ref: Reg 19 (For official use only)
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Name of the Local Plan to which this representation relates:

City Plan 2040

Please return to City of London Corporation BY 11:00PM 31 May 2024 emailing to: planningpolicyconsultations@cityoflondon.gov.uk

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at www.cityoflondon.gov.uk/privacy). Please also see our Statement of Representations Procedure available at: City Plan 2040 - City of London.

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

Part A

1. Personal
Details*

**If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if
applicable)

Title

Mr

First Name

Chris

Last Name

Colloff

Job Title

(where relevant)

Planner

Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Line 2	<input type="text"/>	<input type="text"/>
Line 3	<input type="text"/>	<input type="text"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

Part B – Please use a separate sheet for each representation

Name or Organisation: Thames Water Utilities Limited

3. To which part of the Local Plan does this representation relate?

Paragraph Policy Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy IN1 relates to infrastructure provision and connection. The reference to delivering water efficient buildings is supported. It should be noted that Thames Water offer environmental incentives to developers with discounts on connection charges for water efficient development to help encourage their adoption.

While the reference to water efficiency is supported it is essential that policies and planning permissions are aligned. In order for the optional water efficiency standard set out in the Building Regulations to be applied, a condition will need to be included on any approval for new residential development as set out in Policy SI5 of the London Plan. From a review of recent planning approvals for new residential development it does not appear that conditions are being attached in relation to water efficiency and we would encourage the Council to incorporate conditions on future permissions requiring the optional requirement of the Building Regulations to be met calculated using the 'fittings based approach' as set out in correspondence circulated to local authorities in May 2023.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

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We support the aims of Policy IN2 on infrastructure capacity. New development will need to be aligned with any necessary water or wastewater network upgrades required to support growth. Failure to do this could lead to adverse impacts such as sewer flooding, pollution of land or water courses and issues of low/no water pressure. Where infrastructure upgrades are required, it is not possible for S106 agreements to be used to secure the delivery of infrastructure. As such, in order to ensure that the policy effective and therefore sound, reference should be made to the use of phasing conditions where necessary to ensure that development is not occupied until the required infrastructure upgrades have been delivered.

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To make it clear that planning conditions may be used, where necessary, to align new development with infrastructure delivery it is considered that the text in Section 8.3.4 should be revised as set out below:

*“Developers will be required to submit written evidence from utility providers that effective engagement has been carried out. This could include a joint statement of intent endorsed by the relevant providers. S106 agreements may be used to ensure continuous engagement regarding route planning and confirmation of load demands. **Where necessary, planning conditions will be used to ensure that the phasing of the occupation of development and delivery of infrastructure is aligned.**”*

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As set out in our comments in relation to the draft City Plan, basement development, by its subterranean nature, is at greater risk of sewer flooding in the event of surcharging of the sewer network. In order to ensure that new basement development is protected from the risk of sewer flooding from surcharging of sewers it is considered that the Local Plan should seek to ensure that such developments are fitted with positive pumped devices. While non-return valves protect from flooding from surcharging of the sewers they can result in flooding from internally generated wastewater when the valves are shut. To help ensure basement developments are flood resistant and resilient and ensure the policy is effective it is considered that reference should be made to the need for positive pumped devices as opposed to non-return valves.

(Continue on a separate sheet /expand box if necessary)

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To help ensure basement developments are flood resistant and resilient it is considered that the text in the final bullet at Section 13.3.7 should be revised to state:

“fitting positive pumped devices or similar on plumbing to prevent sewer surcharge within the building”

(Continue on a separate sheet /expand box if necessary)

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The policy is supported. However, in order to ensure that surface water flows into the combined sewer network are minimised it is considered that the policy could be amended to make reference to maximum discharge rates that will be allowed for pumped discharges.

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Where it is not possible to achieve greenfield run-off rates it is considered that the policy should require that the discharge rate does not exceed 2l/s/ha as set out in DEFRA guidance (see: https://assets.publishing.service.gov.uk/media/602e7158d3bf7f7220fe109d/Rainfall_Runoff_Management_for_Developments_-_Revision_E.pdf). This would assist with minimising flows of rainwater into the combined sewer network.

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