

Proposed Submission Core Strategy for the Royal Borough of Kensington and Chelsea with a focus on North Kensington

Development Plan Document

Local Development Framework

Publication Stage Representation Form

Please e-mail this form to: planningpolicy@rbkc.gov.uk

Alternatively send this form to:

Planning Services
Policy Team
Room 328
The Town Hall
Hornton Street
London
W8 7NX

For further information:

Visit our website at: <http://ldf-consult.rbkc.gov.uk>

Phone the LDF hotline on: 020 7361 3879

Responses must be received no later than midday Thursday 10th December 2009

Personal Details

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To be “sound” a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

“Justified” means that the document must be:

- founded on a robust and credible evidence base
- the most appropriate strategy when considered against the reasonable alternatives

“Effective” means that the document must be:

- deliverable
- flexible
- able to be monitored

“Consistent with National Policy” means that it is consistent with government guidance contained within Planning Policy Guidance and Planning Policy Statements

	Yes	No
Do you consider the core strategy to be legally compliant?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Do you consider the core strategy to be Sound?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<i>Please tick the appropriate box</i>		

If you have selected YES and you wish to support the legal compliance or soundness of the core strategy, please be as precise as possible when setting out your comments below

Please make it clear which Paragraph number, Vision box number, Policy box number or Objective box number you are commenting on.

Proposed Submission Core Strategy as a whole. The following are general comments provided for information.

General Comments

It is important to consider the capacity of water and sewerage infrastructure provision for new development proposals and this is highlighted by paragraph 4.9 of the new PPS12, which states that in preparing Local Development Documents:

“LPAs should ensure that delivery of housing & other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources. Annex B sets out further guidance on resources, utilities and infrastructure provision.”

Paragraphs B3 to B8 of PPS12 also place specific emphasis on the need to take account of infrastructure such as sewerage early on in preparing Development Framework Documents. Paragraph B3 in particular states: ***“The provision of infrastructure is important in all major new developments. The capacity of existing infrastructure and the need for additional facilities should be taken into account in the preparation of all local development documents.”***

Regulation 25 of the Town & Country Planning (Local Development) Regulations 2004 relates to pre-submission consultation. It states that LPAs must consult **“specific consultation bodies”** prior to the publication of a first draft Development Plan Document (DPD). The interpretation in Part 1 of the Regulations states that sewerage and water undertakers constitute “specific consultation bodies”.

Consultation with Thames Water

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and sewerage systems, in accordance with the new Regulations, adequate time should be allowed to consider development options and proposals so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of weeks; for example, the modelling of water and sewerage infrastructure systems will be important to many consultation responses and this can take a long time to carry out (e.g. modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows).

We also have to consult with the Environment Agency to obtain a clear picture as to possible water abstraction and waste water discharge consent limits prior to undertaking modeling from a treatment perspective. This process itself can take a considerable period of time, especially if it depends on the EA undertaking its own evaluation exercise. Therefore, realistic consultation periods with water and sewerage undertakers will need to be taken account of in the preparation of the LDDs.

Please attach additional pages as required

If you have selected NO do you consider the core strategy to be unsound because it is not.

Justified

Effective

Consistent with national policy

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3.3 Strategic Objectives, Paragraph 3.3.5.

Thames Water supports the Strategic Objective for Respecting Environmental Limits.

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Paragraph 4.3.7.

The reference to the Thames Tunnel and the upgrade of the Counters Creek Sewer at paragraph 4.3.7 is supported.

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Chapter 19 Strategic Sites Allocations. Please see also attached Sites Schedule.

Thames Water's detailed comments on the Strategic Sites Allocations are set out in the attached Sites Schedule. In summary Thames Water has no objection in principle to the allocation of the identified sites for development. However, for some sites depending on the type and scale of development proposed, there may be capacity issues in relation to the existing water supply and sewerage networks.

For these sites it may therefore be necessary for Thames Water to undertake investigations to determine the impact of any development proposed. As such it is recommended that the following paragraph should be added to the Core Strategy in respect of the relevant Strategic Sites Allocations.

Water:

“Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.”

Waste Water:

“Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”

It is essential to ensure that adequate utilities infrastructure, particularly water and sewerage infrastructure is in place ahead of development, to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low-pressure water supply problems.

Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection to existing networks by developers, ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of planning conditions. It is therefore essential that there is a policy requiring the phasing of developments to ensure that they do not take place ahead of the necessary provision of infrastructure.

Where the existing infrastructure is of insufficient capacity to cope with the proposed development we may require an 18-month to three-year lead in time for provision of extra capacity to drain new development sites. If any large engineering works are needed to upgrade infrastructure the lead in time could be up to five years.

Planning Applications

Thames Water would expect to be consulted on most major planning applications. Paragraph B4 of PPS12, states that ***“the adequacy of infrastructure can be a material consideration in deciding whether permission should be granted.”*** Paragraph 22 of PPS23, 2004, states at Appendix A that the following should be considered in the

preparation of development plans and can be material in the consideration of individual planning applications:

- The provision of sewerage and sewage treatment and the availability of the existing sewerage infrastructure.
- The need to make suitable provision for the drainage of surface water.
- Compliance with water quality objectives.

Thames Water published and circulated in Summer 2007 to all LPAs in our area a “**Guide for LPAs on Planning Application & Development Plan Consultation with Thames Water Utilities as Statutory Water and Sewerage Undertaker**”. This will be of assistance to you when determining which planning applications to consult TWUL on and in the preparation of LDF documents.

Please attach additional pages as required

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Paragraph 36.3.12. Subterranean Development.

The following should also be noted with reference to subterranean extensions and the associated risk of flooding. Sewage networks are designed to surcharge to just below cover level. The Introduction of subterranean development could mean that point becoming the lowest release point on the network and therefore flooding of a basement could occur in an area not previously affected. Therefore all subterranean development should have a pumped sewage system and protection from backflow to reduce the risk of flooding.

Part H of Buildings Regulations 2000 states that manhole covers in the road should be assumed to surcharge to just below cover level. Protection to basements needs to be provided either by the installation of a pumped system where the risk of flooding is high or by the installation of a flap valve where the risk to flooding is low. The best option is for the basement to be protected by pumped systems. Flap valves have a habit of failing when you need them most.

Thames Water has provided to the Royal Borough of Kensington and Chelsea details of areas at highest risk of sewer flooding and we understand that this information has been incorporated in sequential tests as part of the overall Flood Risk Assessment and in LDF documentation. We understand that subterranean development will not be permitted in areas at high risk of flooding, notwithstanding any protective measures that a developer may put in place. Where we identify or are consulted on third party planning applications for construction/conversion of basements, we seek to ensure that the following informative is included in any planning approval:

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

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29.2 Infrastructure and Planning Obligations (s106), Paragraphs 29.2.1 - 29.2.4 and Policy C1 Infrastructure Delivery and Planning Obligations.

The recognition that “delivery of infrastructure is critical to the delivery of all the strategic objectives of the Core Strategy” is strongly supported. The inclusion of Policy C1: Infrastructure Delivery and Planning Obligations within the Core Strategy is also supported, however Thames Water is concerned that the Policy makes no specific reference to utilities infrastructure.

The LDF, in providing a strategy for the future development of the Royal Borough, has a key role in helping to co-ordinate new development with the requisite infrastructure. This includes the provision of adequate water resources together with the necessary treatment and distribution systems, and waste water treatment capacity and disposal routes. Planning Policy Statement 12 (PPS12) contains advice on the need for Local Planning Authorities, in preparation of development plan documents, to consider the requirements of utilities for land to enable them to meet demands placed upon them and the environmental effects of such additional uses.

The LDF should provide a clear context within which the local planning authority can plan for the future. In doing so, the strategy will need to be sufficiently flexible to enable water supply and wastewater infrastructure to respond to the demand new development creates. For example, we may require a three to five year lead in time for provision of extra capacity to supply and drain new development sites, thus it should not be assumed that utility infrastructure will always be readily available.

A utility infrastructure policy within the Core Strategy would be appropriate and should seek the phasing of new development with the appropriate utility infrastructure. This in accordance with consolidated London Plan (2008) Policy 4A.18.

This will help to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, or the pollution of land and watercourses. The policy should include considering land and premises utilities may require. A suggested policy is outlined below:

“New development will be co-ordinated and phased inline with the provision of appropriate utility infrastructure.

The local planning authority will seek to ensure that there is adequate water, foul drainage and sewage treatment capacity to serve all developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users.”

Yes

No

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Policy CE2 Flooding and Paragraphs 36.3.15 - 36.3.20

The inclusion of Policy CE2 Flooding within the Core Strategy is supported and in particular the recognition within the Policy that surface water and sewer flooding, as well as fluvial flooding, can have serious impacts. However in order to strengthen the Policy accordingly we consider that an additional bullet point should be added to state that developments at risk of sewer flooding, or exacerbating existing sewer flooding, should be avoided unless the appropriate infrastructure can be put in place ahead of the development to avoid adverse environmental and amenity impacts.

Thames Tunnel

The section of the proposed submission core strategy that relates to the Thames Tunnel addresses the relevant planning issues in a more appropriate way compared with the previous version and the progress that has been made is welcomed. In particular the reference at paragraph 4.3.7 supporting policy CP1 is supported.

In our view, in respect of the Thames Tunnel, the Core Strategy is not fully compliant with the legal tests. However, we believe that minor changes to the supporting text using either the focused changes or the minor changes procedure set out in the CLG Plan Making Manual (September 2009) would satisfactorily address this problem. Part of the justification would be to ensure that the document is up to date.

Although it is only a short time since the previous consultation there have been a number of relevant policy developments since September 2009.

Firstly, the Mayor of London has now published the draft replacement London Plan, and also his draft Water Strategy. Whilst so far the replacement London Plan can only be afforded limited weight as a material planning consideration, it can only gain weight as your Core Strategy progresses towards examination and therefore the Core Strategy will need to reflect the sentiment of the new Plan. Proposed Policy 5.14 relates to Water quality and strategic infrastructure. There is a section headed "LDF Preparation". This states "Within LDF's boroughs should identify sewerage infrastructure requirements and relevant boroughs should support in principle the Thames Tideway Sewer Tunnels". The mayor expressed similar sentiments in a debate at a meeting of the GLA on 9 September 2009 stating that "I do think it important that we get this project done and am sure that all Councils will recognise the long-term benefits to London of the Thames Tideway Tunnel".

This is not however a new policy; rather a clarification of that in the existing London Plan which states "the mayor will, and the boroughs should, support the implementation of the Thames Tideway Sewer Tunnel project". The Core Strategy

needs to be in general conformity with this policy and the lack of express support for the Thames Tunnel is of concern.

Related to this point is the Mayor's Water Strategy which also clearly supports the Thames Tunnel. Proposal 10 indicates that "*The Mayor will work with Thames Water and other partners to support the construction of the Thames and Lee Tunnels, in a cost-effective way and minimising disruption, as a means of greatly reducing storm discharges from the combined sewer system and improving the quality of the water in the River Thames.*" The Royal Borough is one of these partners.

Secondly, the new River Basin Management Plan for the Thames supports the project. This will be published by Defra before Christmas, but is already available on the Environment Agency website. Regulation 17 of the Water Environment (Water Framework Directive) (England and Wales) Regulations 2003 states that each public body must have regard to River Basin Management Plans and supplementary plans. This requirement applies to both local authorities and the Planning Inspectorate. The River Basin Management Plan states that "*the London Tideway Tunnels are fundamental to the achievement of good status in the Thames catchment*". The London Tideway Tunnels comprise two separate projects, namely the Lee Tunnel (which has been granted planning permission) and the Thames Tunnel. A failure to support the Thames Tunnel would overlook a key project that is fundamental to necessary improvements to the Thames which are required to ensure that the UK complies with the EC Urban Waste Water Treatment Directive.

Thirdly, your Council will recently have received a letter from Defra dated 20 November 2009. Although mostly regarding the options for the consideration of our planning submissions the letter also stresses that the project will "play a nationally significant role in securing UK compliance with the Urban Waste Water Treatment Directive." It also clearly indicates that consideration of the Thames Tunnel will be included in the Waste Water NPS and as such will be identified in a national policy. As you will know from correspondence from the CLG dated 9 November 2009 NPSs are at the heart of the new planning regime and local planning authorities must therefore have regard to NPSs when preparing plans. This includes draft NPSs. Given that it has been stated to the Council that the waste water NPS will include the Thames Tunnel, it will be prudent for the Core Strategy to support the project. Failure to expressly support the Thames Tunnel means that the Core Strategy would not be in accordance with national policy.

Furthermore, not only is it a matter of national policy that the Thames Tunnel be delivered – it is also in the national interest. On 8 October 2009 the European Commission commenced infraction proceedings against the UK Government regarding compliance of the waste water collecting system in London with the Urban Waste Water Treatment Directive. Depending on the outcome of the case there is the potential for unlimited fines to be levied against the UK Government. It is therefore in the national interest to deliver the Thames Tunnel as it is part of the solution to the problem of water quality in the Thames.

There are a number of factual errors in the wording of paragraph 36.3.19 which contribute towards the existing text not being justified. In particular, there seems to be some confusion in the terminology. When we refer to the London Tideway Tunnels, these consist of two separate projects; the Lee Tunnel and the Thames Tunnel. The Lee Tunnel is located within the London Borough of Newham and the administrative areas of London Thames Gateway Development Corporation and the Olympic Delivery Authority, and has been granted planning permission. There is therefore no need for the Royal Borough to refer to the London Tideway Tunnels or the River Lee as only the Thames Tunnel is relevant for its area.

Having regard to the above, and in order to better link the supporting text to the proposed policy our concerns in respect of the Core Strategy can be overcome by altering paragraph 36.3.19 to read as follows:

"Thames Water has been instructed by the Government to develop and implement a scheme to substantially reduce the amount of untreated sewage that currently overflows directly to the River Thames after rainfall. The proposed Thames Tunnel will capture sewage discharges from existing Combined Sewage Overflows (CSOs) into a new tunnel and transfer the collected sewage for treatment. Two CSOs need to be intercepted within the Royal Borough, one at Lots Road and one located close to the Royal Hospital. The London wide benefits of the Thames Tunnel are recognised by the Greater London Authority and in the Thames River Basin Management Plan which recognises that the tunnel is fundamental to improving the water quality in the Thames catchment. Accordingly the Royal Borough supports the principle of the project and suggests detail policy criteria for managing impacts."

We have some reservations regarding the inclusion of the Thames Tunnel in the Infrastructure Delivery Plan (IDP). In our view the main purpose of the IDP is to identify the infrastructure necessary to deliver the amount of development identified in the Core Strategy. This is set out by paragraph 4.8 of PPS12 and the PAS good practice guide "A steps Approach to Infrastructure Planning and Delivery". However, if the change outlined above is accepted then we would not object to the retention of this text as it does capture the need for the project.

The references to proposed capacity improvements to Counters Creek, including at paragraph 36.3.18 are supported. Thames Water has recently secured regulatory funding to progress short-term mitigation from sewer flooding for the period 2010 to 2015, in addition to planning and developing a long-term solution.

It is recommended that the following text is added to the Core Strategy:

'The Directorate of Planning and Borough Development along with the Directorate of Transport, Environment and Leisure Services will actively support Thames Water in the delivery of short-term mitigation against sewer flooding and the continued planning and development of a long-term solution.'

Please attach additional pages as required

Thames Water Utilities Ltd. – Site Specific Comments on Kensington and Chelsea Strategic Site Allocations – Proposed Submission Core Strategy, December 2009

Site ID	Site Name	Water Response	Waste Response	Additional Comments
Strategic Site 1	Kensal Gasworks (sites north & south of railway)	<p>Depending on the type and scale of development proposed, there may be capacity issues in relation to the existing water supply network. It may therefore be necessary for Thames Water to undertake investigations to determine the impact of any development proposed. As such the following paragraph should be added to the relevant section of the Core Strategy:</p> <p>“Developers will be required to demonstrate that there is adequate water supply capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing water infrastructure.”</p>	<p>Depending on the type and scale of development proposed, there may be capacity issues in relation to the existing sewerage network. It may therefore be necessary for Thames Water to undertake investigations to determine the impact of any development proposed. As such the following paragraph should be added to the relevant section of the Core Strategy:</p> <p>“Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure.”</p> <p>During this period ongoing discussions with both the LPA and developer will be necessary to ensure the impact on Thames Water assets is not prejudicial.</p>	
Strategic Site 2	Wornington Green	Comments as Strategic Site 1.	Comments as Strategic Site 1.	Site covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

Strategic Site 3	Land adjacent to Trellick Tower	On the information available to date we do not envisage infrastructure concerns regarding Water Supply capability in relation to this site.	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	Site covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.
Strategic Site 4	North Kensington Sports Centre	Comments as Strategic Site 1.	Comments as Strategic Site 1.	Site covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.
Strategic Site 5	Commonwealth Institute	Comments as Strategic Site 1.	Comments as Strategic Site 1.	
Strategic Site 6	Warwick Road	Comments as Strategic Site 1.	Comments as Strategic Site 1.	Site covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

Strategic Site 7	Earl's Court	Comments as Strategic Site 1.	Comments as Strategic Site 1.	Site covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.
Strategic Site 8	Lots Road Power Station	Reinforcement of water supply network mains will be required as recommended by impact assessment, dependant on type and scale of development proposed.	Comments as Strategic Site 1.	This site is located very close to Thames Water's Lots Road strategic pumping station, which is an operational sewage pumping station. Surface water discharges should pass straight to River Thames by private agreement. Access to the site is shared and TW obviously require unrestricted 24 hour access. Storm discharge mains pass through the development site.