

Drainage/ surface water/flooding issues

Relevant planning policies:

2021 London Plan Policy SI 12 Flood Risk Management

Policy SI 13 Sustainable Drainage

RBKC Sustainable Drainage Design and Evaluation Guide

RBKC Local Plan 2019 Policy CE2 and New Local Plan Policy Review 2021 Surface Water Run-off and Sustainable Drainage Systems (SuDS)

These policies require a Flood Risk Assessment and management plans and suitable drainage systems to be developed.

This Ballymore application has addressed these policies and there are mitigations/management systems proposed: - significant use of green/blue roofs

- Large underground water storage to control run off rates
- Discharge of surface water into the GU Canal.

However, throughout the documentation there are references to the proposals being “subject to consent by the Canal and River Trust” and “consent under Section 106 of the Water Industry Act 1991” etc.

Given that no such consents have been granted at this stage and initial responses to consultation with CRT and Thames Water have included:

“Current sewage systems would NOT have the capacity to receive the aforementioned surface water flows” Thames Water.

“As this is a secondary option for the development’s surface water strategy, Thames Water shall be consulted on their capacity concerns (if required) at a later date once discussions with the CRT have concluded.”

While CRT have said ***“It may be that we do not have capacity to accept water from a scheme of this scale at present (without funding to improve the weirs at the next locks in Camden, which could provide additional capacity.” “We would want reassurance that no contamination would reach the canal.”***

It appears that these important issues are not resolved at all at this stage and this therefore poses a risk. A development of this size and complexity should not be granted permission without more surety of how water and drainage issues will be appropriately addressed.