

Survey:

What is your name? __Chris Colloff_____

What is your organisation (if applicable)?_Savills on behalf of Thames Water Utilities Limited__

1. Which part of the Plan are you commenting on?

Policy: Paragraph: Table: Map:

2. Do you consider the Plan is:

Legally compliant? Yes: No:

Sound? Yes: No:

3. If you believe the Plan to be unsound, is this because it is not:

Positively prepared

Justified

Effective

Consistent with national policy

4. Please give reasons for your objection or support:

In Thames Water's response to the preferred options consultation a concern was raised that the basement development policy should incorporate a requirement for basement developments to be served by a positive pumped device to prevent the risk of sewer flooding. The Councils response to this request is that no change is required as the issue is addressed by Building Regulations.

The Building Regulations state that pumped devices should be provided in areas with at high risk with anti-flooding valves installed in areas at low risk. There is concern over this approach as there is no absolute requirement within the Building Regulations for pumped devices to be provided. Furthermore, the risk of sewer flooding can change over time as additional flows are connected to the networks and climate change results in more intensive storms. In addition, properties could be at risk if there are any operational issues with the network. The use of anti-flooding valves are not effective as these can become blocked and prevented from closing properly. In addition, when anti-flooding valves are

closed there is no way for wastewater generated within a property to be disposed of leaving the property at risk of flooding from internally generated wastewater.

As a result of these risks it is considered that all basement developments should be fitted with a positive pumped device or similar to ensure that the property is adequately protected from the risk of sewer flooding. Without this the policy will not be effective at ensuring that new basement properties are protected from this risk. By requiring positive pumped devices to be provided in new basement developments the policy would ensure that it is consistent with paragraph 149 of the NPPF which states that *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk”*

5. What change(s) do you consider necessary to make the Plan legally compliant or sound?

To address the above concern a further bullet point should be added to Policy BD3 to state that:

- Be protected from sewer flooding by a suitable pumped device.

A similar requirement is included in other Local Plans including Policy CL7 of the Royal Borough of Kensington and Chelsea Local Plan.

6. If your representation is seeking a change, do you wish to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

7. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

If you would like to comment on additional policies, please fix another sheet to this.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names and addresses of those making representations can be made available and taken into account by the Inspector. The Council, its

appointed Local Plan Programme Officer or the Planning Inspector appointed to undertake the Examination may also contact you regarding your response.

- Please indicate if you wish your personal data to be used for reasons other than identifying your representation and being contacted in relation to that representation.