

British Water comments

Page: [Policy SI12 Flood risk management](#)

Section: [N/A](#)

1. The Water infrastructure (SI5), Flood Risk Management (SI12) or Sustainable Drainage (SI13) talk about ongoing monitoring and flood risk alarms for site infrastructure to increase risk awareness and potential ongoing maintenance requirements. The recommendation is that each new network have a monitoring system to report on system performance. Therefore, by continually managing the new top of the catchment networks better this should improve the performance of the downstream sections of the network too, which are typically the most stressed sections.

Page: [Policy SI13 Sustainable drainage](#)

Section: [N/A](#)

1. For the Sustainable drainage hierarchy (Section SI13 B), would below ground attenuation (option 6) be allowed for the purposes of infiltration (option 2) or are all below ground tanks a lower priority? We believe additional clarification of terminology is required.

Page: [Policy SI17 Protecting London's waterways](#)

Section: [N/A](#)

Within the Protecting London's Waterways section (SI17) there is the comment "Development proposals to impound and constrain waterways should be refused". Does this mean that dam/flow control solution to attenuate the flow and reduce downstream flood risk is already ruled out even if there is a flood risk reduction downstream and no flood risk increase upstream?

Page: [Multi-policy response](#)

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This input as made on behalf of the British Water Surface Water Focus Group, the members of which are engaged in the manufacture of goods, and provision of services, related to the management of surface water.

1. The Water infrastructure (SI5), Flood Risk Management (SI12) or Sustainable Drainage (SI13) talk about ongoing monitoring and flood risk alarms for site infrastructure to increase risk awareness and potential ongoing maintenance requirements. The recommendation is that each new network have a monitoring system to report on system performance. Therefore, by continually managing the new top of the catchment networks better this should improve the performance of the downstream sections of the network too, which are typically the most stressed sections.
2. For the Sustainable drainage hierarchy (Section SI13 B), would below ground attenuation (option 6) be allowed for the purposes of infiltration (option 2) or are all below ground tanks a lower priority? We believe additional clarification of terminology is required.
3. Within the Protecting London's Waterways section (SI17) there is the comment "Development proposals to impound and constrain waterways should be refused". Does this mean that dam/flow control solution to attenuate the flow and reduce downstream flood risk is already ruled out even if there is a flood risk reduction downstream and no flood risk increase upstream?

The British Water Surface Management Group would be pleased to provide specific, draft brief text in all the above respects, if wished.

Kind regards,

Mar Batista

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