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## Haringey Local Plan Wood Green Area Action Plan (AAP) Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the Borough and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

### **Development Guidelines - Water Supply and Sewerage Infrastructure**

We support in principle the standard development guideline that: “Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.” However, we consider that further detail/improvements are required in line with our previous comments.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: “**Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....**”

Paragraph 162 of the NPPF relates to infrastructure and states: “**Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.**”

The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that “**Adequate water and wastewater infrastructure is needed to support sustainable development**” (Paragraph: 001, Reference ID: 34-001-20140306).

Policy 5.14 of The London Plan, March 2015, relates to Water Quality and Wastewater Infrastructure and states: ***“LDF preparation E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”*** Policy 5.15 relates to Water Use and Supplies.

Notwithstanding Policy DM41 of the Development Management Policies DPD which we support in principle, we consider it is important that the AAP considers the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network.

It is unclear at this stage what the net increase in demand on Thames Water’s infrastructure will be as a result of the AAP proposals. It is therefore important that developers demonstrate that adequate water supply and wastewater infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate reports and appraisals to ascertain whether the proposed development will lead to overloading of existing water and sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water company to agree what improvements are required and how they will be delivered prior to any occupation of the development.

Thames Water recommends that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met;
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and wastewater infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time requires for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time must be allowed for a high level risk assessment to be undertaken. Should more comprehensive responses be required, it is likely that more detailed modelling work will need to be undertaken. The necessary funding for this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.

Thames Water consider that text along the lines of the following should be added to the AAP to support the general Development Guideline:

**“Water Supply, Wastewater & Sewerage Infrastructure**

***Developers will be required to demonstrate that there is adequate water supply, waste water capacity and surface water drainage 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 and/or waste water infrastructure.***

***Drainage on the site must maintain separation of foul and surface flows.***

***Where there is an infrastructure capacity constraint the Council will require the developer to set out what appropriate improvements are required and how they will be delivered.***

***Further information for Developers on water supply and sewerage infrastructure can be found on Thames Water's website at:***

***<https://developers.thameswater.co.uk/>***

### **Development Sites**

#### **Specific Water Supply and Sewerage/Wastewater Infrastructure Comments:**

The attached table provides Thames Water's site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure in relation to the proposed housing sites, but more detailed modelling may be required to refine the requirements. As set out in the table we do have some network concerns for both water & waste.

These sites have been assessed on an individual base with only limited opportunity to consider cumulative impacts. Therefore, the impact of multiple sites in the same area coming forward may have a greater impact. The scale, location and time to deliver any required network upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing.

Where we have identified sites where drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development, in the first instance a drainage strategy would be required from the developer to determine the exact impact on our infrastructure and the significance of the infrastructure required to support the development.

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.

I trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours faithfully



**Richard Hill**

Head of Property