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Tottenham AAP



Planning Policy Manager

Sent by email to: ldf@haringey.gov.uk

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Dear Sir/Madam

HARINGEY – DRAFT DEVELOPMENT MANAGEMENT POLICIES DPD – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Savills are pleased to respond to the above consultation on behalf of Thames Water.

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 on behalf of Thames Water:

Policy DM41 – Managing Drainage Connections & Waste Water

Thames Water support Policy DM41 in principle, but consider that it needs to be improved, particularly in relation to water supply.

A key sustainability objective for the preparation of the DPD/Local Plan should be for new development to 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 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and Policy 5.15 relates to water use and supplies.

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Thames Water consider that the Local Plan should include a specific reference to the key issue of the provision of water supply and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs).

Such a policy is required to ensure the infrastructure is provided in time to service 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. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of “soundness” for Local Plans.

Policy DM41 is generally very good in relation to waste water/sewerage, but there needs to be similar policy covering water supply.

Parts B&C of Policy DM41 also require some clarification regarding the separation between foul and surface water along the lines of the following:

“B. The Council will give preference to mains **foul** drainage and will seek to restrict the use of non-mains drainage **for foul water disposal**, particularly in Source Protection Zones, in line with Environment Agency guidance.

All proposals for new development must seek to manage surface water as close to its source as possible, in line with the London Plan drainage hierarchy.

C. Where non-mains drainage is proposed **for the disposal of foul water**, a foul drainage assessment will be required to ensure the most sustainable drainage option will be implemented.”

Water Efficiency

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and this issue should be specifically covered in the DPD/Local Plan.

All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum.

Thames Water have a water efficiency website:

www.thameswater.co.uk/waterwisely

By exploring the interactive town, Waterwisely, you can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of **free devices** to help save water. The Policy/supporting text could make reference to this guidance.

However, managing demand alone will not be sufficient meet increasing demand and Thames Water adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan. Therefore, it is

important that the DPD/Local Plan facilitates any necessary new water supply infrastructure (refer to comments on the infrastructure issue).

Specific Waste Water treatment Comments - Deephams Sewage Works Upgrade

The proposed Deephams Sewage Works Upgrade represents essential infrastructure development required to both significantly improve the quality of effluent discharged into the Salmons Brook and River Lee and to provide essential capacity for the management of increased amounts of sewage wastes arising as a result of population growth, including at the Haringey Local Plan area.

Improvements are required to Deephams Sewage Works to ensure that Salmons Brook which in turn flow into the Pymmes Brook and River Lee meet environmental quality standards to comply with the Urban Waste Water Treatment Directive, Freshwater Fish Directive and the Water Framework Directive. To meet these legislative obligations, the Environment Agency has determined that a new tighter effluent discharge consent is needed at Deephams Sewage Works.

The National Policy Statement (NPS) for Waste Water (adopted March 2012) confirms that the Government's environmental regulators have approved a project at Deephams Sewage Works to improve the standard of treatment in order to meet European and National water quality targets. The NPS confirms the need for the improvements to Deephams Sewage Works and that these are essential to meet the environmental standards set out above, and to accommodate growth in the catchment.

We would request that the DPD makes reference to the Deephams Sewage Works, and recognising the need for the Upgrade to accommodate planned growth within the catchment. Planning permission for the Upgrade was issued by LB Enfield on 17th February 2015 and work is due to start on site in Spring 2015 and be complete by summer 2018.

Policy DM18 – Residential Extensions

Thames Water request that the following informative be incorporated in the Policy or supporting text:

“There may be existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a ‘Build over or near to’ Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989.”

Policy DM24 – Basements

Thames Water consider the risk of flooding as a result of basement development should be made clearer and require mitigation to overcome this along the lines of the following:

“Thames Water requests that all basement development incorporates a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflow causing sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with paragraph 103 of the NPPF which highlights the need to avoid flooding and also in the interests of good building practise as recognised in Part H of the Building Regulations.”

Policy DM37 Sustainable Drainage Systems

Thames Water support the London Plan drainage hierarchy and Policy DM37 and welcomes the Mayor's emerging London Sustainable Drainage Action Plan.

Urbanisation, climate change, population growth and modern lifestyles are putting sewers under increasing pressure. While the fabric of Thames Water's sewerage system is largely in good condition, many sewers now handle much larger volumes than they were designed to.

Development in the capital in particular has led to a very significant loss of permeable areas. We have seen in our area a 19% increase in impermeable areas in 40 years. In London, most of the runoff from impermeable surfaces such as roofs, roads and car parks now enters Thames vWater's combined sewers, which surcharge during storms. In Thames Water's combined sewers they often see a ratio of surface water to foul water for storm flows of approximately 90:10.

The step increase in growth coming forward across London puts the importance of SuDS into ever increasing focus.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to:

- improve water quality
- provide opportunities for water efficiency
- provide enhanced landscape and visual features
- support wildlife
- and provide amenity and recreational benefits.

Policy DM39 Protecting and Improving Groundwater Quality and Quantity

There are a large number of groundwater and surface water assets within the Borough and Thames Water therefore support Policy DM39 which aims to protect these.

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

Yours faithfully

David Wilson BA (Hons), BTP, MRTPI
Associate Director Planning