

17 March 2015
Tottenham AAP



Planning Policy Manager

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

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Dear Sir/Madam

HARINGEY – TOTTENHAM DRAFT AREA ACTION PLAN PREFERRED OPTION – COMMENTS ON BEHALF OF THAMES WATER UTILITIES LTD

Thames Water Utilities Ltd (Thames Water) Property Services function is now being delivered by Savills (UK) Limited as Thames Water's appointed supplier. Savills are therefore 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:

Key Issue – Water Supply and Sewerage/Wastewater Infrastructure

A key sustainability objective for the preparation of the Local Plan/AAPs 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 works 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 NPPG 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).***

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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.

It is important to consider 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 proposed AAP proposals. Details of, and the time to deliver, any required upgrades will be determined after receiving a clearer picture of the location, type and scale of development together with its phasing. Thames Water welcomes the opportunity to work closely with the Haringey Council as the Plan evolves to identify the net increase in demand on our infrastructure.

Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts of internal and external sewer flooding of property, pollution of water courses and / or issues of no or low water pressure.

It is therefore essential 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 funded 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.

To accord with the NPPF, NPPG and the London Plan text along the lines of the following should be added to the AAP:

“Water Supply & Sewerage Infrastructure

It is essential that developers demonstrate that adequate water supply and sewerage 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 studies to ascertain whether the proposed development will lead to overloading of existing water & 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 funded prior to any occupation of the development.

Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:

<http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm>

Or contact can be made with Thames Water Developer Services by post at:

Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;

By telephone on: 0845 850 2777;

Or by email: developer.services@thameswater.co.uk”

It may be possible for public sewers or water mains to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989. The developer would be required to pay for any mains diversions.

Thames Water must also be consulted regarding proposals involving building over or close to a public sewer. If building over or close to a public sewer is agreed by Thames Water it will need to be regulated by an Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers or water mains to be moved at a developer’s request so as to accommodate development in accordance with Section 185 of the Water Act 1989.

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 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 their latest draft Water Resource Management Plan.

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