



Planning Policy

Thames Water Utilities Ltd

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Dear Sir/Madam,

LONDON BOROUGH OF HARINGEY – DRAFT SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. The provision of water and wastewater infrastructure is essential to any development.

As you will be aware, 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:

Proposed Housing Allocations

The attached table provides Thames Water's site specific comments from desktop assessments on water supply and sewerage/wastewater infrastructure, but more detailed modelling may be required to refine the requirements.

These sites have been assessed primarily on an individual base. Therefore, the impact of multiple sites in the same area coming forward will have a greater impact. The scale, location and 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 Authority and developers as the Allocations DPD evolves to identify the net increase in water supply and sewerage demand on our infrastructure. While it is unlikely that sewage treatment and water resources will be a constraint from the level of growth identified, Thames Water is concerned that the network in this area may be unable to support the demand anticipated from these proposals. It should therefore be assumed that network upgrades will be required. The net increase in

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demand for water and waste water services needs to be considered if no/low water pressure and internal/external sewage flooding of property is to be avoided.

In general terms, Thames Water's preferred approach for growth is for a small number of large clearly defined sites to be delivered rather than a large number of smaller sites as this would simplify the delivery of any necessary wastewater infrastructure upgrades.

Once further details of the proposed sites are available, Thames Water would welcome the opportunity to meet with the Authority to discuss the water and wastewater infrastructure needs relating to Allocations DPD.

Development Guidelines

A number of the site allocation development requirements set out that: *"Thames Water should be consulted with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents."*

The sites where we have concerns regarding sewerage network capacity are set out on the enclosed table. For these sites we request that the developer provide a detailed drainage strategy for foul and/or surface water, informing what infrastructure is required, where, when and how it will be funded. This assessment will determine if there is any available capacity. In many cases, development flows can be adjusted to account for available capacity through variations to the on-site drainage strategy. If infrastructure upgrades are required, the assessment will determine the scope (not cost) of these upgrades. This could be funded either by the developer (through the Requisition process), or if the upgrades are of a strategic nature and address multiple sites, can be funded by Thames Water. We would expect an implementation window in the order of 3 years to design and construct appropriate upgrades. Thames Water has very limited funding in the period 2015-2020 to upgrade the public sewer system for increase in capacity due to growth. We prioritise our investment based on a risk approach with the consequence and likelihood of increased flow adversely affecting the sewer system. We prefer to fund strategic upgrades where known pinch points in the sewer system restrict the ability to accommodate multiple sites.

At the time planning permission is sought for development at these sites we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the drainage strategy are implemented ahead of occupation of the development.

As set out on the enclosed table, we have similar concerns regarding a number of sites in relation to water supply. For these sites we request that the developer also provide a detailed water supply strategy informing what infrastructure is required, where, when and how it will be funded. Again, at the time planning

permission is sought for development at this site we are also highly likely to request an appropriately worded planning condition to ensure the recommendations of the strategy are implemented ahead of occupation of the development.

Proposed Allocations SA22; SA37 and SA38

Proposed allocations SA22;SA37 and SA38 include within the Development Guidelines an aspiration to open up access to the New River.

The New River is an operational asset used for water supply and maintaining security and operational safety are Thames Water's key priority. However, Thames Water is willing to work with the Council to explore the opportunity of improving access.

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

Yours faithfully

Mark Mathews
Town Planning Manager
Thames Water Utilities Ltd.