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29 May 2012

Dear Sir/Madam

Re: Woking LDF Draft Core Strategy Further Consultation re NPPF

Thank you for your letter dated 1st May regarding the National Planning Policy Framework (NPPF) published on 27th March 2012.

We would like to update our previously submitted representations as follows:

Policy CS16: Infrastructure Delivery - Oppose

Question 1 – Sound – No

Question 3 – Not effective & Not consistent with national/regional policy.

Reasons Why

Thames Water do not object to the policy in principle, but consider that it does not adequately cover water and sewerage infrastructure provision, particularly in light of the fact that the South East Plan is to be revoked and not replaced.

A key sustainability objective for the preparation of the Local Development Framework/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 new 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:

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“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.”

Part 9 the South East Plan, 2009, relates to Natural Resource Management and includes a separate section on Sustainable Water Resources and Water Quality Management. Policy NRM1 relates to Sustainable Water Resources and lists a number of water supply infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that development is directed ***“....to areas where adequate water supply can be provided from existing and potential water supply infrastructure. In addition ensure, where appropriate, that development is phased to allow time for the relevant water infrastructure to be put in place in areas where it is currently lacking but is essential for the development to happen.”*** Policy NRM2 relates to Water Quality and lists a number of water quality/sewerage infrastructure issues which local authorities should take into account in preparing Local Development Documents including ensuring that: ***“....adequate wastewater and sewerage capacity is provided to meet planned demand...”***.

With the abolition of the Regional Spatial Strategies this increases the importance that the Core Strategy must contain a policy covering the key issue of the provision of water and sewerage infrastructure to service development.

Proposed Change

It is therefore important that Policy CS10 is amended to specifically refer to water and sewerage/wastewater infrastructure or there should be a new Policy along the lines of:

Proposed Addition to Infrastructure Policy CS10 or Text for new Water/Wastewater Infrastructure Policy

Planning permission will only be granted for developments which increase the demand for off-site service infrastructure where:

- 1. sufficient capacity already exists or**
- 2. extra capacity can be provided in time to serve the development which will ensure that the environment and the amenities of local residents are not adversely affected.**

When there is a capacity problem and improvements in off-site infrastructure are not programmed, planning permission will only be granted where the developer funds appropriate improvements which will be completed prior to occupation of the development.”

Text along the following lines should be added to the Core Strategy to support the above proposed Policy :

“The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewerage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity 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 infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development.”

Such a policy is important as sewerage and water undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.

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

Yours Faithfully

Mark Mathews
Town Planning Manager
Thames Water Property Services.