



Planning Policy Team

Thames Water Property Services

Sent by email: [REDACTED]

Your ref
Our ref
Contact
Phone
E-Mail

Chris Colloff

[REDACTED]

22nd March 2016

Dear Sir/Madam

Draft Local Plan Consultation – January 2016

Thank you for consulting Thames Water on the above document. Thames Water are the statutory sewerage undertaker for the western areas of the Borough and the statutory water undertaker for a small area of the Borough and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Policy 10.13: Flood Risk

Thames Water fully support Policy 10.13 on flood risk and in particular requirement (e) for development to avoid flood risk by:

“(e) demonstrating that the applicant has contacted the sewerage provider to identify whether the sewerage network has adequate capacity both on and off site to serve the development and to assess the need to contribute to any additional off site connections for the development. Where capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.”

Development of sewerage infrastructure cannot be delivered through CIL or S106 contributions approach covered by Policy 10.7. As such Thames Water consider that this policy is necessary to ensure that any infrastructure upgrades required to the sewerage network are delivered ahead of the occupation of development.

To ensure that there is clarity over the requirements of the policy the following additional supporting text could be included:

“The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure 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 adverse amenity impacts

Thames Water

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for existing or future users in the form of internal and external sewer flooding or pollution of land and water courses.

In some circumstances this may make it necessary for developers to carry out appropriate appraisals and reports to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure. Where there is a capacity constraint the Local Planning Authority should require the developer to provide detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered.”

Policy 10.14: Sustainable Drainage

Thames Water fully support policy 10.14 on sustainable drainage. Thames Water will seek to ensure that SuDS are prioritised and implemented for developments of all sizes, and support policies on surface water flow reduction from brownfield sites that will ease pressure on the sewer network regardless of the size of the development and type of SuDS implemented.

Recognising that SuDS are only one of a number of competing considerations for developers when drafting their designs, and for local planning authorities when determining applications, we have reviewed the approach we take with local planning authorities and developers. We aim to:

- Engage with developers, local planning authorities and lead local flood authorities at the earliest possible opportunity when a development is known to be likely, working collaboratively wherever possible to ensure sewer flood risk is taken into account from the outset. This will help all parties understand the extent of any work needed before a development can proceed, and the costs.
- Provide local planning authorities with clear advice; proactively highlighting areas where foul water and surface water from new developments would pose an increased risk of floods from sewers, so that the impact of new developments is reflected in planning decisions.
- Adopt a more proactive approach by designing, funding, building, adopting and maintaining SuDS ourselves, in some circumstances with contributions from other parties where appropriate to make the scheme viable.

A copy of our policy on SuDS is attached for information.

Site Specific Comments

On the basis of the information contained within the draft Local Plan in relation to site allocations Thames Water has reviewed the potential impacts on existing infrastructure. Comments on the sites are attached to this response. The impact of development on wastewater infrastructure will also depend on the timing of delivery and point of connection to the network together with development elsewhere within the catchment.

In order to ensure that the water supply and drainage requirements of development proposals are understood and that any upgrade requirements are identified, all developers should be encouraged to contact Thames Water Developer Services in advance of the submission of planning applications.

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

- The developments demand for water supply infrastructure both on and off site and can it be met;
- The developments demand for wastewater 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.

Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at: <http://www.thameswater.co.uk/developers/1319.htm>

Contact can be made with Thames Water Developer Services by:

Post to: [REDACTED]

Telephone on: [REDACTED]

Email: [REDACTED]

Yours faithfully,

[REDACTED]

Mark Mathews
Town Planning Manager
Thames Water Property Services.

Site ID	Site Name	Waste Response
50155	001A & 001B - Land North Of Highwood Close including St Georges Court	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
37055	003 - Wates Way Industrial Estate, Ongar Road, Brentwood	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
37063	013B - Warley Training Centre, Essex Way, Warley	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.

48737	022 - Land At Honeypot Lane, Brentwood	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
50159	032 - Land East Of Nags Head Lane, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
37064	039 - Westbury Road Car Park, Westbury Road, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
37065	040 - Chatham Way/Crown Street Car Park, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
37067	041 - Land at Hunter House, Western Road, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.

50156	044 & 178 - Land At Priests Lane, Brentwood	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.
50158	099 - Victoria Court, Victoria Road, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.
37077	100 - Baytree Centre, Brentwood	We have concerns regarding Wastewater Services in relation to this site. Specifically, the wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Upgrades to the existing drainage infrastructure are likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a capacity constraint the Local Planning Authority should require the developer to provide a detailed drainage strategy informing what infrastructure is required, where, when and how it will be delivered. 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. It is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades can take around 18 months to 3 years to design and deliver.