



Planning Policy Team  
Brentwood Borough Council

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12 March 2018

## Brentwood Borough Council Local Plan Preferred Site Allocations Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory sewerage undertaker for part of the Borough and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012.

### Site Specific Comments

Thames Water have undertaken a high level review of the preferred site allocations within the Thames Water region. Comments on wastewater infrastructure issues are appended for your information.

### Wastewater Infrastructure Requirements

From the 1<sup>st</sup> April 2018 all off site wastewater network reinforcement works necessary as a result of new development will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for water and wastewater for each new property connected. Wastewater treatment infrastructure will be funded through water companies' investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

### Planning Policies

Within the new Local Plan Thames Water would like to see policies included in relation to the issues set out below.

#### Wastewater Infrastructure

Thames Water have concerns that the document makes no reference to wastewater infrastructure. Growth and climate change will place more pressure on the existing wastewater infrastructure including sewerage networks and sewage treatment works. As such Thames Water consider that the Local Plan should contain a policy in relation to water and wastewater infrastructure. Such a policy should seek to ensure that there is adequate wastewater infrastructure in place to serve all new developments.

Thames Water has limited powers under the Water Industry Act 1991 to prevent connection to its network ahead of infrastructure upgrades. In some circumstances it may be necessary to seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding, pollution of land and water courses and / or issues with water supply in the form of no or low water pressure. To support the use of planning conditions where necessary to ensure development is phased to align with infrastructure requirements Thames Water recommends the inclusion of the following paragraph and policy in the local plan:

Proposed new policy:

***“Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.”***

Proposed new policy supporting text:

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to underestimate the time required to deliver necessary infrastructure. For example: to understand, design and deliver local network upgrades can take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to 10 years.

To minimise the likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.

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: 0800 0093921; or by email at: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

### Sustainable Drainage Systems (SuDS)

Thames Water supports the approach to Sustainable Drainage as set out in the Planning Practice Guidance. SuDS provide opportunities to reduce the causes and impacts of flooding, remove pollutants and provide amenity, recreation and wildlife benefit. In particular developers should ensure that surface water run-off is managed as close to source as possible and should aim to

achieve greenfield run-off rates. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground or watercourse. It is only when all options have been exhausted and there is not practical reason for using sustainable drainage (documented evidence will be required to support this position) that developers should seek connection to the public network. Where the proposal is to discharge to a combined network it is important to minimise the quantity of surface water entering the network in order to maximise the capacity for foul sewage conveyance and to reduce the risk of sewer flooding.

Thames Water would support the inclusion of policies on SuDS within the Local Plan. Such a policy should cover both the provision of SuDS through new development proposals but should also support the retrofitting of SuDS. The retrofitting of SuDS can assist with ensuring there is capacity within the sewerage network to address the impacts of growth and climate change.

### Amenity

Thames Water consider that the Local Plan should include a policy ensuring that the amenity of occupiers of new developments are not adversely affected by existing sources of odour without adequate mitigation measures being put in place.

Where development is being proposed within 800m of a sewage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Where development is being proposed within 15m of a sewage pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in close proximity to a pumping station.

I trust the above and enclosed comments are satisfactory, but please do not hesitate to contact me if you have any queries.

Yours sincerely,



**Richard Hill**  
Head of Property

Site ID	Site Name	Waste Response	Internal Comments
57211	002 - Brentwood railway station car park St James Road, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>Significant assets run beneath the site. We would seek protection of these assets and may require several wayleaves / easements. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff</p>
37055	003 - Wates Way Industrial Estate, Ongar Road, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p>

37088	010 - Sow & Grow Nursery, Ongar Road, Pilgrims Hatch	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>On the information available to date we do not envisage network infrastructure concerns regarding wastewater infrastructure capability in relation to this site. The site is served by Anglian Water, however it finally discharges in Thames water. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal.</p>
48737	022 - Land At Honeypot Lane, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>We expect surface water to be discharged into the natural drain crossing the site. There are local sewers crossing site.</p>

54998	023A and 023B - Land off Doddinghurst Road, either side of A12, Brentwood	Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years	Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is therefore recommended that Anglian Water are also consulted for their comments in relation to this development proposal.
54999	027 - Land adjacent to Camel, Mascalls Lane, Warley		We do not envisage network infrastructure concerns regarding wastewater infrastructure capability in relation to this site on a basis that it won't be any surface water connection into a public foul sewer system. Connection of surface water into a public foul sewer system reduces sewer capacity and has the potential to cause flooding to existing customers. Drainage hierarchy to be followed in addressing surface water

50159	032 - Land East Of Nags Head Lane, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>Surface water needs to be addressed in accordance with the surface water disposal hierarchy. If it is demonstrated the only possible discharge point for surface water is the public foul sewer, we will expect significant surface water attenuation prior to discharge (below Greenfield run-off rates) and as this is a net increase, we will have to assess if the public sewer system can accommodate this increase.</p>
37064	039 - Westbury Road Car Park, Westbury Road, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.</p>

37065	040 - Chatham Way/Crown Street Car Park, Brentwood (Reviewed Jan18)	Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years	On the information available to date we do not envisage network infrastructure concerns regarding wastewater infrastructure capability in relation to this site. Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff.
37067	041 - Land at Hunter House, Western Road, Brentwood (Reviewed Jan18)	Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years	Surface water to be addressed according to the Drainage hierarchy. This being a brownfield site we expect a significant reduction in surface water runoff.
50156	044/178 - Land At Priests Lane, Brentwood	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal. Drainage hierarchy to be followed in addressing surface water.

55002	075B - Land off Stocks Lane, Kelvedon Hatch	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Drainage hierarchy to be followed in addressing surface water. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal.
54995	081 - Council Depot, The Drive, Warley	Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to discuss the scale and phasing of development and what wastewater infrastructure may be required to support it at the earliest opportunity.	We would expect that a holistic drainage strategy will be prepared for sites 081 - Council Depot, The Drive, Warley and 117A and 117B - Ford Offices, Eagle Way, Warley, Brentwood Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff

54996	083 - Land west of Warley Hill, Pastoral Way, Warley	Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years	Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff
57215	085B - Land adjacent to Tipps Cross Community Hall, Blackmore Road, Tipps Cross	On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.	Please note that the above comments relate to the sewerage network within the Thames Water supply area only. The outfall sewer that the Thames Water network connects to is within the Anglian Water supply area and flows to Anglian Water's High Roding Sewage Treatment Works. It is therefore recommended that Anglian Water are also consulted for their comments in relation to this development proposal.

19397	102 - WILLIAM HUNTER WAY, CAR PARK SITE, BRENTWOOD	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years</p>	<p>Drainage hierarchy to be followed in addressing surface water. As this is a brown field site, we expect significant reduction in surface water runoff</p>
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57210	117A and 117B - Ford Offices, Eagle Way, Warley, Brentwood	<p>Infrastructure at the wastewater treatment works in this area is unlikely to be able to support the demand anticipated from this development. Significant infrastructure upgrades are likely to be required to ensure sufficient treatment capacity is available to serve this development. Thames Water would welcome the opportunity to work closely with the Local Planning Authority and the developer to better understand and effectively plan for the sewage treatment infrastructure needs required to serve this development. It is important not to under estimate the time required to deliver necessary infrastructure. For example: Sewage Treatment Works upgrades can take 18 months to 3 years to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years The wastewater network capacity in this area may be unable to support the demand anticipated from this development. Local upgrades to the existing drainage infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a potential wastewater network capacity constraint, the developer should liaise with Thames Water to discuss the scale and phasing of development and what wastewater infrastructure may be required to support it at the earliest opportunity.</p>	<p>We would expect that a holistic drainage strategy will be prepared for sites 081 - Council Depot, The Drive, Warley and 117A and 117B - Ford Offices, Eagle Way, Warley, Brentwood</p>
57213	194 - Brizes Corner Field, Blackmore Road, Kelvedon Hatch	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Drainage hierarchy to be followed in addressing surface water. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal.</p>
57214	294 - Chestnut Field, Backmore Road, Hook End	<p>On the information available to date we do not envisage infrastructure concerns regarding wastewater infrastructure capability in relation to this site.</p>	<p>Drainage hierarchy to be followed in addressing surface water. Please note that the above comments relate to the sewerage network within the Thames Water supply area only. It is recommended that Anglian Water are also consulted for their comments in relation to this development proposal.</p>