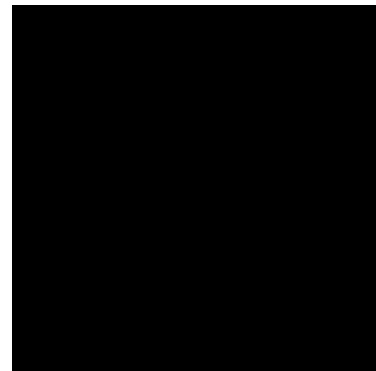


13 February 2015
15.02.13 L CC Brentwood Local Plan Growth Options



Planning Policy
Brentwood Borough Council

By email: planning.policy@brentwood.gov.uk



Dear Sir/Madam,

LOCAL PLAN STRATEGIC GROWTH OPTIONS CONSULTATION – COMMENTS ON BEHALF OF THAMES WATER

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.

Thames Water are the statutory sewerage undertaker for the western areas of the Borough and are hence a "**specific consultation body**" in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

General Comments

Thames Water would welcome the opportunity to work closely with the council and developers to ensure that infrastructure is delivered in time. In some circumstances developer funded capacity studies may be required.

Question 12 of the consultation document asks if the main areas of infrastructure have been considered and are there other important issues to consider.

Under the infrastructure issues document on p31 there is no reference to utilities infrastructure or more specifically to water and wastewater infrastructure. It is essential that any wastewater network infrastructure upgrades required to support development are provided ahead of occupation to ensure that there is no increased risk of sewer flooding. Section 6.2 outlines that previous Local Plan consultation responses have outlined the importance of essential infrastructure being in place before development is completed and that the Council will need to consider ways to ensure this can be delivered.

The Local Plan should make specific reference to water and wastewater infrastructure. In relation to wastewater infrastructure comments regarding the treatment and network infrastructure were provided in the response to the preferred options consultation and are provided again below. Suggestions were also made in the previous response for alterations to Policy DM35 to ensure that development is aligned with any wastewater infrastructure upgrades necessary to ensure that there is no increased risk of sewer flooding and these suggestions are maintained.

Wastewater Treatment

As set out in the response to the preferred options consultation in 2013 waste water from the area served by Thames Water is treated at Brentwood STW. Thames Water do not anticipate any issues with regard to the capacity at the works to serve the growth as set out in the consultation document.

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Wastewater Network

The key wastewater network issue will be to ensure that there is sufficient hydraulic capacity of the network to cater for the growth being proposed. Failure to align the delivery of development with the waste water network infrastructure required to support it could result in adverse impacts such as the sewer flooding or pollution of watercourses.

The need for any upgrades should be determined through drainage strategies and detailed discussions with the developer, where the point of connection to the existing network is appraised against the scale of development and its potential phasing.

Through appropriate infrastructure development plan policies, and if necessary through the use of Grampian style planning conditions, drainage strategies and any subsequent necessary infrastructure network upgrades should be provided by either the developer or Thames Water. This will ensure that sufficient hydraulic capacity is provided ahead of occupation of new development, and in so doing, avoiding any increased risk of sewer flooding. The timescales for providing network upgrades should not be underestimated with local upgrades taking 18 months to 3 years to deliver and strategic upgrades taking 3 to 5 years.

Generally speaking those development sites of 20 units or more lying within the area served by Thames Water would require further developer funded investigations to ensure network capacity exists to serve those developments without detriment to existing customers. Should there be insufficient capacity within the network then developers would need to demonstrate how the necessary upgrades to the network would be delivered ahead of the occupation of development.

Where it is shown that sewerage network upgrades are required Thames Water would welcome the support of the local planning authority in attaching appropriately worded Grampian planning conditions to any approvals to ensure that upgrades are completed ahead of occupation of the development.

A typical Grampian condition would be:

“No development shall commence until full details of a drainage scheme, for the provision of mains foul water drainage, including any off site drainage infrastructure, has been submitted to and approved in writing by the local planning authority. The drainage scheme shall include details of phasing of the occupation of the development and be implemented in full prior to the occupation of any buildings within the relevant phase(s) of the development.”

I trust that the above comments are of use. However, should you wish to discuss the comments please do not hesitate to contact me.

