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11 April 2017

## Cotswold District Council - Fairford Neighbourhood Plan- Pre Submission Draft.

Dear Sir / Madam

Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on Fairford Neighbourhood Plan, pre-submission draft. Thames Water are the statutory water and sewerage undertaker for the majority of Cotswold District, including Fairford, and the following comments are made in this respect.

### General Comments

Thames Water have provided comments previously to the Fairford Neighbourhood Plan consultations. Since the last round of consultation in December 2016 we have liaised informally with the Neighbourhood Plan Forum to try to agree formal wording.

Thames Water note that the Neighbourhood Forum have not taken all Thames suggested changes and recommendations. Whilst we would again like to request that some of these are taken on board to ensure that the plan is clear and robust, Thames Water would like to confirm that they broadly support the draft plan. Our specific comment are set out below.

### FNP6 – Managing Flood Risk

Thames Water support Policy FNP6 and its reference to sewer flooding as well as fluvial flooding.

### Draft Policy FNP7- In Investing in Utilities Infrastructure improvements and its supporting paragraphs

We also broadly support Policy FNP7 which requires developers to ensure that there is adequate sewerage capacity to serve all new development coming forward.

We however have concerns over the supporting paragraphs. We propose the following amendments.

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5.29 Fairford Town Council has been concerned for several years that further development would lead to overloading of existing sewage infrastructure, ~~since the population for the~~

catchment has already exceeded the design horizon of the 2006 upgrade. Ground and surface water ingress into the foul sewers adds to the problem, leading to sewage overflow in storm conditions and flooding of properties following prolonged and heavy rainfall.

The provider, Thames Water, has acknowledged the problems of sewer and surface water flooding and is working on a drainage strategy for Fairford. Stage 1 of this Fairford Drainage Strategy called Initialise/Prepare, Published in 2016, states:

*"In recent years, the foul sewerage system in Fairford has become overwhelmed in some locations following prolonged and heavy rainfall. This has resulted in properties suffering from sewer flooding and restricted toilet use. The foul sewerage system is recorded as a separate foul system rather than a combined network. We believe that the system has surcharged due to of a combination of groundwater infiltration to public sewers and private drainage, significant volumes of surface water run-off from surrounding saturated fields, inundation from highways and public spaces, surface water misconnections (i.e. downpipes from roofs), and river water overflowing from the River Coln. The root causes of sewer surcharges are therefore numerous and the resolution of the issues complex, requiring all stakeholders responsible for drainage in the catchment to work together to resolve them."*

~~The 2006 upgrade was expected to provide adequately until after 2021, since the then Local Plan allowed a maximum of 260 additional houses in that period. However, actual growth has been significantly greater than this — 320 houses by 2015 and 120 more consented since, so that the sewer, pumping and treatment systems are working at the limit of capacity. Fairford is not included in the Thames Water Capital works programme 2015-2020, hence the requirement for FNP7. Thames Water has suggested that the CDC Local Plan should include "When there is a capacity constraint and improvements in off-site infrastructure are not programmed, the developer should set out how the infrastructure improvements will be completed prior to occupation of the development."~~

5.30 To avoid sewage flooding, the Fairford sewage treatment works operates a fully-compliant permanent storm overflow system which permits discharge of highly diluted sewage into local watercourses during storm events. To meet changing performance requirements and regulatory measures the works has undergone upgrades over the years. Thames Water has stated that *"the capacity of the sewage treatment works is being reviewed due to the amount of new development now proposed within the catchment. Assessments will be undertaken to understand the phasing of the proposed future development and growth, and the operational implications for the existing sewage works."*

~~The Water Integrated with Local Delivery (WILD) group, a partnership project in the Cotswold Water Park working to improve the water environment, has reported (WILD project Rivers Management Plan for Fairford Parish May 2016) that the water quality of the River Coln has deteriorated in recent years.~~

5.31 Therefore, further housing developments in Fairford must wait until sufficient sewage capacity has been provided to accommodate the additional flows they will produce, before they can connect to the system. Hence the requirement in Policy FNP16 that the future development proposed at Leafield Road awaits an upgrade to the foul water system before the development can take place.

**Comment [c1]:** Although the population may have exceeded the theoretical design capacity forecast in 2006 (which we can not verify), what happens through a biological treatment process and due to variables in population and their water consumption means we need to use monitoring data at the STW to say whether there is an issue in reality over time. The site is currently operating within its consent although it's true that there is not a lot of headroom for growth, hence why we are investing in new assets this year and installing two additional nitrifying filters.

This will essentially increase the biological treatment capacity of the STW

**Comment [c2]:** Thames Water does not agree with this comment and have not seen any evidence to support it.

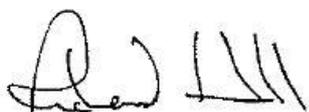
The storm overflow is consented and compliant. And therefore as it stands without the required information substantiating this comment we would like to see this removed.

Where capacity constraints are identified, Thames Water will work with the developer to ensure any necessary infrastructure upgrades are delivered ahead of occupation.

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If you would like to discuss further then please do not hesitate to contact Carmelle Bell on 0118 9520503 who will be able to assist.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Richard Hill', with a stylized flourish at the end.

Richard Hill  
**Head of Property**