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## **Cotswold District Council – South Cerney Draft Neighbourhood Plan Consultation Regulation 16**

Dear Sir / Madam,

Thank you for consulting Thames Water on the above document. Thames Water is the statutory water and sewage undertaker for the Cotswold District area and hence a “specific consultation body”. We have the following comments on the South Cerney Neighbourhood Plan:

### **Water and Wastewater Infrastructure Delivery**

The way water and wastewater infrastructure will be delivered has changed. Since the 1st April 2018 all off site water and 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. Strategic water and wastewater infrastructure requirements will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.

It is important not to under estimate 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 extension or new treatment works could take up to 10 years.

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 phase development 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 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.

### **Water and Wastewater Infrastructure**

In order to help ensure that new development is aligned with any necessary water and wastewater network upgrades required to support it we would request that the following text is incorporated within the Neighbourhood Plan:

*“Developers need to consider the net increase in water and waste water demand to serve their developments and also any impact the development may have off site further down the network, if no/low water pressure and internal/external sewage flooding of property is to be avoided.*

Thames Water encourages developers to use our free pre-planning service (<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Water-and-wastewater-capacity>). This service can tell developers at an early stage if we will have capacity in our water and/or wastewater networks to serve their development, or what we'll do if we don't.

*The developer can then submit this as evidence to support a planning application and we can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes”.*

### **Policy SC14 – Alleviation of Flooding**

Thames Water is currently working with the developer for the Chesterton development and a strategic solution is being delivered which will improve flooding resilience for the existing sewer system. Part of the existing sewage in Cirencester will be diverted and connected to a new sewer system that will provide more resilience to groundwater infiltration affecting foul sewers and receiving sewage treatment works.

Additionally, South Cerney falls in an area with high levels of groundwater infiltration. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. Development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. The developer should also liaise with the lead local flood authority (LLFA) to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

We hope this is of assistance. If you have any questions please do not hesitate to contact Stefania Petrosino on the above number.

Yours sincerely,

**Thames Water Utilities Ltd**