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## Cotswold District Council – Kemble and Ewen Neighbourhood Plan 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 Kemble and Ewen Neighbourhood Plan:

### General Comments

New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the National Planning Policy Framework (NPPF), February 2019, states: **“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”**.

Paragraph 28 relates to non-strategic policies and states: **“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”**.

Paragraph 26 of the revised NPPF goes on to state: **“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary...”**.

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that: **“Adequate water and wastewater infrastructure is needed to support sustainable development”** (Paragraph: 001, Reference ID: 34-001-20140306).

### 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://www.thameswater.co.uk/preplanning>). 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”.*

### **Site Specific Comments**

The attached table provides site specific comments from a desktop assessment on sewage and water supply infrastructure.

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**