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Merton Local Plan 2020 – Stage 2 Consultation

Dear Sir/Madam,

Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above.

As you will be aware, Thames Water Utilities Ltd (Thames Water) are the statutory water and sewerage undertaker for the majority of the Borough and are hence a “**specific consultation body**” in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on the consultation document:

6. Infrastructure – Policy In6.2

Thames Water generally support the infrastructure policy, but consider it should be improved in relation to water and wastewater/sewerage infrastructure (in addition to paragraph 8.7.20).

Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.

Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.

A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), July 2018, 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).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. 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: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.

From 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water’s charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.

Information on how off site network reinforcement is funded can be found here <https://developers.thameswater.co.uk/New-connection-charging>

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply and network infrastructure both on and off site;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/preplanning>

In light of the above comments and Government guidance we consider that the New Local Plan should include a specific reference to the key issue of the provision of water and

sewerage/wastewater infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text:

PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE TEXT

“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”

“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 the water/waste water company 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.”

Local Authorities should also consider both the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in year 1 of the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025. The next Price Review, whereby the water companies' AMP7 Business Plan will be agreed with Ofwat, will take place in 2019.

We therefore request that the new Local Plan include the following policy/supporting text:

“The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”

8. Environment

Water Infrastructure – paragraph 8.7.20

This section requires updating in light of the new charging regime introduced in April 2018 as discussed above.

It would also seem more relevant to cover water/wastewater infrastructure issues in the Infrastructure Section 6 – see comments above and suggested text on water/wastewater infrastructure.

Policy F8.6 & F8.7 - Flood Risk and SUDS

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.

Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to:

- improve water quality
- provide opportunities for water efficiency
- provide enhanced landscape and visual features
- support wildlife
- and provide amenity and recreational benefits.

Climate Change Policy CC8.10

We support the aims of this policy and have the following comments:

The Environment Agency has designated the Thames Water region to be "*seriously water stressed*" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day as set out in the NPPG (Paragraph: 015 Reference ID: 56-015-20150327) and consider that this should be included in the policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:

<https://www.thameswater.co.uk/Be-water-smart>

4. Housing

Thames Water provide both water and wastewater/sewerage infrastructure service to the Merton Borough area. Some of the southern part of the Borough will have water services provided by Sutton Water.

Wastewater flows drain to Crossness Sewage Treatment Works STW, located in Bexley Borough and so growth in following councils will also need to be considered: Bexley; Bromley; Croydon; Greenwich; Kingston; Lambeth; Lewisham; Southwark; Sutton; and Wandsworth.

Upgrades at the STW are likely to be required to serve the growth identified in the plan and so it is important that the Merton, the other councils and developers engage with Thames Water so that we can understand the needs and deliver solutions in a timely manner

Housing section H42 says that the Council will 'work with housing providers to facilitate the provision of a minimum of 6,165 additional homes for the period 2020 – 2035. However, there is currently no clear indication of where and when these houses will be provided.

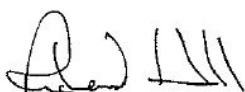
While the consultation document gives some areas where development may be possible it doesn't give any indication as to what scale of development will be located at those sites and so it is difficult for us to review the infrastructure requirements other than to say:

- Development location, type, scale and phasing are important if Thames Water are to effective plan and deliver infrastructure in line with development
- The time to deliver infrastructure should not be underestimated it can take 18 months to 3 years to understand plan and deliver local upgrades 3 – 5 years for more strategic solutions.
- Developer should be encouraged to engage with TW at the earliest opportunity to discuss infrastructure needs
- We offer a free pre application service to encourage developers to do this >>>>>> Link <https://www.thameswater.co.uk/preplanning>

We would welcome the opportunity to work closely with the Council and the developers, especially on phasing details and specific location details. This will enable us to better understand and effectively plan for the water/wastewater infrastructure improvements required. 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.

We trust the above is satisfactory, but please do not hesitate to contact me if you have any queries.

Yours faithfully



Richard Hill
Head of Property