



## Planning Policy

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### Thames Water Property Services

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Our ref  
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24 July 2012

Dear Sir/Madam

### Re: Merton Draft Rainbow Industrial Estate planning brief

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

As previously indicated, 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 Development) Regulations 2004 (as amended in May 2008). We have the following comments on the Consultation Document:

#### **Water Supply and Waste Water Infrastructure Provision**

A key sustainability objective for the preparation of the Local Development Framework/Local Plan 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 156 of the new National Planning Policy Framework (NPPF), March 2012, states:

***“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”***

Paragraph 162 of the NPPF relates to infrastructure and states:

***“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”***

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Policy 5.14 of The London Plan, July 2011 is directly relevant as it relates to Water Quality and Wastewater Infrastructure and states:

**“Strategic**

*A - The Mayor will work in partnership with the boroughs, appropriate agencies within London and adjoining local authorities to:*

- a) ensure that London has adequate and appropriate wastewater infrastructure to meet the requirements placed upon it by population growth and climate change*
- b) protect and improve water quality having regard to the Thames River Basin Management Plan*

**Planning Decisions**

*B - Development proposals must ensure that adequate wastewater infrastructure capacity is available in tandem with development. Proposals that would benefit water quality, the delivery of the policies in this Plan and the Thames River Basin Management Plan should be supported while those with adverse impacts should be refused.*

*C - Development proposals to upgrade London’s sewage (including sludge) treatment capacity should be supported provided they utilize best available techniques and energy capture.*

**LDF preparation**

*E - Within LDFs boroughs should identify wastewater infrastructure requirements and relevant boroughs should in principle support the Thames Tunnel.”*

Policy 5.15 of the London Plan relates to water use and supplies and states:

**“Strategic**

*A The Mayor will work in partnership with appropriate agencies within London and adjoining regional and local planning authorities to protect and conserve water supplies and resources in order to secure London’s needs in a sustainable manner by:*

- a minimising use of mains water*
- b reaching cost-effective minimum leakage levels*
- c in conjunction with demand side measures, promoting the provision of additional sustainable water resources in a timely and efficient manner, reducing the water supply deficit and achieving security of supply in London*
- d minimising the amount of energy consumed in water supply*
- e promoting the use of rainwater harvesting and using dual potable and grey water recycling systems, where they are energy and cost-effective*
- f maintaining and upgrading water supply infrastructure*
- g ensuring the water supplied will not give rise to likely significant adverse effects to the environment, particularly designated sites of European importance for nature conservation.*

**Planning decisions**

*B Development should minimise the use of mains water by:*

*a incorporating water saving measures and equipment*

*b designing residential development so that mains water consumption would meet a target of 105 litres or less per head per day.*

*C New development for sustainable water supply infrastructure, which has been selected within water companies' Water Resource Management Plans, will be supported."*

We consider that the SPD must specifically cover the key issue of the provision of water and sewerage infrastructure to service development in policy to accord with the London Plan. This is essential to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness".

The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP5 period which runs from 1<sup>st</sup> April 2010 to 31<sup>st</sup> March 2015 and does not therefore cover the whole Local Plan period. AMP6 will cover the period from 1<sup>st</sup> April 2015 to 31<sup>st</sup> March 2020, but we have not yet submitted our business plan for this period. Our draft Business Plan for AMP6 will be submitted to Ofwat in August 2013.

Regarding the funding of water and sewerage infrastructure, it is our understanding that Section 106 Agreements can not be required to secure water and waste water infrastructure upgrades. However, it is essential to ensure that such infrastructure is in place to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems.

It is important that developers demonstrate that adequate capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.

Proposed Change

To accord with the NPPF and the London Plan text along the lines of the following section should be added to the AAP:

**“Water Supply & Sewerage Infrastructure**

***It is essential that developers demonstrate that adequate water supply and sewerage infrastructure capacity exists both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing water & sewerage infrastructure. Where there is a capacity problem and no improvements are programmed by the water company, then the developer needs to contact the water authority to agree what improvements are required and how they will be funded prior to any occupation of the development.***

***Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at:***

***<http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm>***

***Or contact can be made with Thames Water Developer Services***

***By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY;***

***By telephone on: 0845 850 2777;***

***Or by email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)”***

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

Yours Faithfully

Mark Mathews  
Town Planning Manager  
**Thames Water Property Services.**