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2nd September 2021

Merton - Local Plan Publication Stage 3 - 22 July to 6 September 2021

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 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 in relation to water and sewerage infrastructure:

Strategic Policy IN 14.1 Infrastructure

14.1.14- 14.1.19 - Water and Wastewater

Sound - No

We support Policy IN 14.1 in principle and support the specific section on water and wastewater at paragraphs 14.1.14-14.1.19. However, we consider that the need for water and wastewater infrastructure should be specifically covered in a policy.

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), 2021, 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 11 states: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:

a) All plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects"

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).

Policy SI5 of the new London Plan relates to water and wastewater infrastructure and supports the provision of such infrastructure to service development.

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 under estimate 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.

As 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 policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. 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:

PROPOSED WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY 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 AMP7 which covers the period from 1st April 2020 to 31st March 2025. AMP8 will cover the period from 1st April 2025 to 31st March 2030. The Price Review, whereby the water companies' AMP8 Business Plan will be agreed with Ofwat during 2024.

We therefore support paragraph 14.1.19 in this respect.

Strategic Policy F15.7 Flood Risk Management and Sustainable Drainage & Policy F15.9 Sustainable Drainage Systems (SUDS)

Sound – No

These policies are supported in principle.

In relation to flood risk, 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 policies 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.

Water Efficiency/Climate Change

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 (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in 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 our website via the following link:

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

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames

Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Proposed policy text:

"Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met."

Policy F15.8 Managing Local Flooding

Sound - Yes

Basements – Sewage flooding

Thames Water's main concerns with regard to subterranean development are:

- 1) The scale of urbanisation throughout London is impacting on the ability of rainwater to soak into the ground resulting in more rainfall in Thames Water's sewerage network when it rains heavily. New development needs to be controlled to prevent an increase in surface water discharges into the sewerage network.
- 2) By virtue of their low lying nature basements are vulnerable to many types of flooding and in particular sewer flooding. This can be from surcharging of larger trunk sewers but can also result from operational issues with smaller sewers such as blockages. Basements are generally below the level of the sewerage network and therefore the gravity system normally used to discharge waste above ground does not work. During periods of prolonged high rainfall or short duration very intense storms, the main sewers are unable to cope with the storm flows.

The policy should therefore require all new basements to be protected from sewer flooding through the installation of a suitable (positively) pumped device. Clearly this criterion of the policy will only apply when there is a waste outlet from the basement i.e. a basement that includes toilets, bathrooms, utility rooms etc. Applicants should show the location of the device on the drawings submitted with the planning application.

Paragraphs 15.8.14-15.9.15 in relation to water infrastructure are supported.

Allocations

The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future water supply/wastewater infrastructure.

The attached table provides Thames Water's site specific comments from desktop assessments on water, sewerage/waste water network and waste water treatment infrastructure in relation to the proposed development sites, but more detailed modelling may be required to refine the requirements.

In assessing the waste needs of these developments we have assumed that surface waters will be managed on site using SUDs and that foul flows will be connected by gravity. Where development doesn't follow these principles, it will lead to spare capacity within the sewerage infrastructure being rapidly eroded and upgrades being required where they have previously not been anticipated.

Process

We use the information in local plans to estimate when upgrades will be required. It is therefore important that the local authority keep us informed of any changes to local plan numbers and how well they are delivering homes against those objectives. Where this doesn't happen it could lead to delays in the delivery of vital infrastructure

Network

Where offsite upgrades are required to serve development they will be delivered and funded by Thames Water using infrastructure charges more info here https://www.thameswater.co.uk/developers/charges

The time to deliver upgrades shouldn't be underestimated it can take 18months – 3 years from the time of certainty and in some cases it may be appropriate for a suitably worded planning condition to be attached to ensure development doesn't outpace the upgrades. Developers are encouraged to engage at the earliest opportunity to discuss their development needs via Thames waters pre planning service https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured water and waste matters for the development are being addressed. Please also refer to detailed comments above in relation to the infrastructure section.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

Policy O15.2 Open Space and Green Infrastructure & MOL designation on Policies Map Site Specific Comments – Thames Water Site at Byegrove Road, SW19 2AY

Sound – No

Thames Water supported the removal of the Wandle Valley Regional Park designation from the Thames Water Sewage Pumping Station site at Byegrove Road, Colliers Wood in the current plan. Thames Water consider that the site should similarly be removed from MOL and Green Corridor designations on the Policies Map in the new Local Plan.

There is currently no public access to the Thames Water operational Sewage Pumping Station (SPS) site for health and safety and security reasons. The SPS site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete/brick storm tanks and is not deemed appropriate for MOL designation.

Background to Site Operations

The site used to be a Sewage Treatment Works (STW), Wandle Valley STW, but this use was disused some years ago and the flows were transferred to Crossness STW, located in LB

Bexley, for treatment. Since the STW was disused the site has been used as a Sewage Pumping Station (SPS) and storm flow storage.

The existing sewage flows are delivered at a much lower level and the SPS located in the middle of the site lifts the flows up into the Merton Valley Sewer which is at much higher level which finally connects into the network which discharges flows to Crossness STW.

There are a number of tanks, previously used for the STW, which are used for storm overflows from the SPS, but they can also hold dry weather flows in the event the SPS fails. These tanks are also used to divert the flows if there are blockages in the network & for any maintenance works Thames Water operations have to carry out on the network.

Thames Water have looked into a high level solution for some years to replace the open storm tanks. Instead of open tanks, proposals have been reviewed to install underground vertical tanks and rationalise the whole site into a manageable area.

There are also 4 water abstraction boreholes on site as part of the South London Resilience to deliver raw water to South London. These come into operation when water demand is high.

The site therefore performs a key operational function in both the sewerage network in preventing sewer flooding and water supply.

Case for Removal of Operational Site from MOL and Green Corridor

It is considered that there are exceptional circumstances to remove the SPS site from MOL and Green Corridor designations in association with the current Local Plan review, as it is a fully developed brownfield site which does not meet the purposes of MOL/green corridor designation.

As previously indicated, Beckton Sewage Treatment Works (STW) has been similarly removed from MOL as part of the Newham Local Plan Review and parts of operational/built up Crossness STW are being removed from MOL in the Bexley Local Plan Review as they are developed in a similar way to the Byegrove Road SPS site.

Policy G3 of the London Plan sets out that "...C Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, taking into account the purposes for including land in MOL set out in Part B."

It is therefore important that this opportunity to de designate the site through the current Local Plan Review is not missed as a future Local Plan review may be too late.

Thames Water and the other water companies, plan for infrastructure in 5 year periods know as Asset Management Plans (AMP). We are currently in AMP7 (the 7th since privatisation) which runs from 1st April 2020 to 31st March 2025. AMP 8 will run from 1st April 2025 to 31st March 2030 and the draft Business Plans will be submitted to Ofwat in 2024 as part of the Price Review (PR24). Therefore, the AMP period process does not match up with the Local Plan Review process and it is important that the current opportunity to remove the site from MOL is not missed.

It is considered that the MOL designation at the Thames Water SPS at Byegrove Road does not meet the requirements of Part B of Policy G3 as set out below and therefore it is considered that exceptional circumstances do exist to remove the MOL designation similar to Beckton and Crossness STW:

1) The site is not distinguishable from the built-up area. The site is not a green open space and is fully developed with large concrete/brick tanks, buildings and significant areas of hardstanding/parking areas as illustrated on the enclosed photos.

The site is industrial in nature and therefore, in our view is not distinguishable from the built-up area and should not be designated as MOL.

2) There is no public access to the Thames Water operational SPS site for health and safety and security reasons. The site incorporates significant built development including a number of sewage pumping station buildings and two sets of large concrete storm tanks with deep water/storm sewage, which would not permit public access.

The site does not include any open-air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London.

- 3) The site is fully developed with sewerage infrastructure and does not contain any features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value.
- 4) The site is not green infrastructure. It is a developed sewerage infrastructure site. Therefore, it does not form part of a strategic corridor, node or a link in the network of green infrastructure and meets none of the above criteria.

The removal of the MOL designation would facilitate any new infill operational buildings in the future which would otherwise have to justify very special circumstances. In our experience, such operational development within the MOL/Green Belt can be delayed by having to demonstrate a very special circumstances case.

It is therefore considered that exceptional circumstances do exist to remove the area from MOL in accordance with Policy G3, as was the case in relation to Beckton STW and Crossness STW.

Proposed Change

Remove the areas highlighted on the attached plans at the Thames Water SPS site at Byegrove Road, Colliers Wood from MOL and Green Corridor designations on Policies Map.

We would wish to attend the examination to support this response in relation to the Thames Water SPS site at Byegrove Road, Colliers Wood.

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

Yours faithfully

Thames Water Utilities Ltd

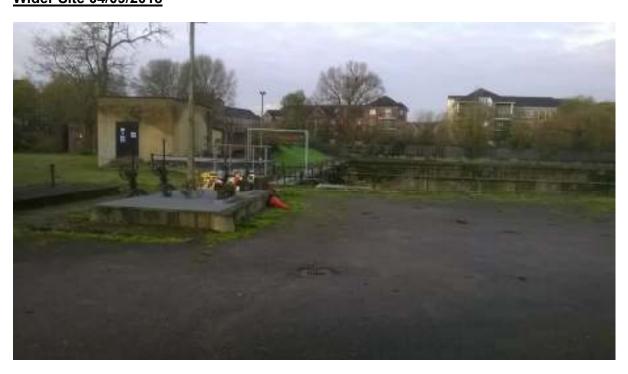




Wandle Valley STW/Byegrove Road SPS



Wider Site 04/09/2018





Wider Site 26/11/2019









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Thames Water Site Specific Comments

| | Site ID | Site Name | ServiceType | Net Gain to System | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Equivalent |
|------------|------------|---|-------------|--------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|------------|
| 20/08/2021 | 70669 | 80-86 Bushey Road, Raynes Park. SW20 0WJ | Both | 481140 | 5.57 | 450 | 157500 | 5.47 | 450 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

| - 1 | | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Net Property Equivalent Increase - Water |
|-----|------------|------------|---|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| | 20/08/2021 | 62516 | BENEDICT WHARF, HALLOWFIELD WAY, MITCHAM, CR4 3BT | Both | 908820 | 10.52 | 850 | 297500 | 10.33 | 850 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning

Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

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|------------|------------|--|-------------|-------------------------|----------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 37017 | BIRCHES CLOSE, MITCHAM, CR4 4LQ MITCHAM, CR4 4LA | Both | 40629.6 | 0.47 | 38 | 13300 | 0.46 | 38 |

Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire. WD3 9SQ

| Created Date | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Net Property Equivalent Increase - Water |
|-----------------|------------|---|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 68019 | CAR PARK SOUTH OF BRITANNIA POINT, 125 HIGH STREET COLLIERS WOOD, SW19 | Both | 245916 | 2.85 | 230 | 80500 | 2.8 | 230 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

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|------------|------------|---|-------------|-------------------------|----------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 37021 | Former Mitcham Fire Station 30 Lower Green West, Mitcham, CR4 3AF | Both | 9622.8 | 0.11 | 9 | 3150 | 0.11 | 9 |

Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

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|------------|------------|--|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 68024 | MAJESTIC WAY, 1 TO 12 MITCHAM, CR4 2JS. | Both | 160380 | 1.86 | 150 | 52500 | 1.82 | 150 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer

can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

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|-----------------|------------|---|-------------|--------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 37028 | Morden Road Clinic and Morden Hall Medical Centre Morden Road, Morden | Both | 57736.8 | 0.67 | 54 | 18900 | 0.66 | 54 |

Standard Paragraphs:

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| Created Date | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Equivalent |
|-----------------|------------|---|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|------------|
| 20/08/2021 | 68021 | PRIORY RETAIL PARK, COLLIERS WOOD, 2-24 CHRISTCHURCH ROAD, COLLIERS WOOD, SW19 | Both | 320760 | 3.71 | 300 | 105000 | 3.65 | 300 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer

can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

The scale of development/s is likely to require upgrades to both the wastewater network and sewage treatment infrastructure. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on the network and treatment infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development. Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

| | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Net Property Equivalent Increase - Water |
|------------|------------|--|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | 61514 | Rufus Business Centre, Ravensbury Terrace, Wimbledon Park, London, SW18 4RL (Pending) | Both | 104781.6 | 1.21 | 98 | 34300 | 1.19 | 98 |

Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

| | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Net Property Equivalent Increase - Water |
|------------|------------|---|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|
| 20/08/2021 | | Tesco Site, 265 Burlington Road, Merton, London KT3 4NE | Both | 487555.2 | 5.64 | 456 | 159600 | 5.54 | 456 |

Standard Paragraphs:

The scale of development/s in this catchment is likely to require upgrades of the water supply network infrastructure. It is recommended that the Developer and the Local Planning Authority liaise

with Thames Water at the earliest opportunity to agree a housing phasing plan. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The housing phasing plan should determine what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s in this catchment. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

| | Site ID | Site Name | ServiceType | to System (I/day) | Increase to System | Property Equivalent Increase - | Increase in Demand | Increase in Peak Demand | Net Property Equivalent Increase - Water | |
|------------|------------|---|-------------|-------------------------|--------------------------|--------------------------------------|--------------------------|-------------------------------|--|--|
| 20/08/2021 | 37015 | Wilson Hospital Cranmer Road, Mitcham, CR4 4LD | Both | 41698.8 | 0.48 | 39 | 13650 | 0.47 | 39 | |

Standard Paragraphs:

On the information available to date we do not envisage infrastructure concerns regarding water supply network infrastructure in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ

On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email Devcon.team@thameswater.co.uk tel: 02035779998 or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ