



Planning Policy

Thames Water Utilities Ltd

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Dear Sir or Madam,

Draft Farnham Neighbourhood Plan Public Consultation

Thank you for the opportunity for Thames Water Utilities Ltd. (Thames Water) to comment on the draft Farnham Neighbourhood Plan. Thames Water are the statutory sewerage undertaker for Farnham and the following comments are made in this respect. It is understood that water is supplied to Farnham by South East Water.

Thames Water supports the preparation of the Farnham Neighbourhood Plan.

General Comments

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 156 of the 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."

Infrastructure

The inclusion of the section on Infrastructure within the Neighbourhood Plan is supported, as are the objectives set out on p.74. The emphasis on the role of the Plan in ensuring that any new development is supported by adequate

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infrastructure is welcomed. In commenting on planning consultations Thames Water's key considerations are to ensure that adequate water supply and waste water infrastructure is in place to serve new development, as well as to provide for existing customers.

Water and sewerage undertakers have limited powers under the Water Industry Act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the planning system to ensure that where necessary essential infrastructure is provided ahead of development, either through phasing or the use of planning conditions.

If sufficient infrastructure is not provided, capacity problems possibly leading to low pressures and sewer flooding for example, could occur in some cases if we have not been given the opportunity, either through advance planning or through conditional planning approvals, to provide additional capacity prior to development.

Farnham Sewage Treatment Works

Farnham Sewage Treatment Works (STW) currently serves the town of Farnham and the surrounding area. The majority of the STW catchment is residential with localised industrial and commercial areas in and around the town centre. The STW currently performs below its 70% capacity threshold, which means that the works is not currently at risk of failing to comply with the effluent consent standards set by the Environment Agency.

In respect of the capacity of the STW to accommodate the options set out for Potential Additional Housing Development in the Neighbourhood Plan, any of Scenarios 1-4 (i.e. up to 3290 new dwellings) can be accommodated with some minor growth upgrade work in the future.

Thames Water intends to carry out odour improvement works at Farnham STW in the current business plan period 2015 - 2020. It is anticipated that this work will focus on the most odorous elements of the treatment process, with the covering of the inlet works, and abstraction of odorous air for treatment in an Odour Control Unit. During the Business Plan period between 2015 and 2020 Thames Water is also planning to end the sludge liming operations at the STW.

Wastewater Network

Additional wastewater network infrastructure reinforcement may be required in respect of some individual developments to ensure that there are no adverse environmental impacts, or increased risk of sewer flooding. Without precise information as to the scale, location and type of development it is not possible at this stage for Thames Water to determine the nature of the new infrastructure that will be required. We would expect developers to liaise with us to determine if

a local network upgrade is required, what the solution would be and how it will be delivered.

Policy FNP11 Housing Options

Thames Water's comments in respect of the proposed housing sites identified in Policy FNP11 are set out in the enclosed schedule of site specific comments. There are a number of sites where upgrades to the existing wastewater network infrastructure are likely to be required.

Where water supply and sewerage network constraints are identified, network upgrades can be delivered in a number of ways. The two most frequently used are either through Thames Water's 5 year asset plan where growth needs are prioritised against each other and the ones with the greatest need are delivered first or via the requisition route where the developer and Thames Water contribute to the solution.

Where there are infrastructure constraints Thames Water highlights to Councils that adequate time needs to be set aside to deliver the necessary infrastructure. For example, local sewerage network upgrades can take over 18 months to design and install, whilst sewage treatment works upgrades can take 3 to 5 years to design and build.

In many cases we will recommend that a condition is included in the planning permission to allow a further risk assessment in the form of an impact study to be carried out. The condition would also require the appropriate infrastructure is in place ahead of the development being occupied. This will ensure that the development proposed does not increase risk of flooding or raise issues of no or low water pressure to existing residents.

Policy FNP15 – Business Site Option.

The allocation of land at Water Lane, Farnham as identified on Map K as a potential business site is supported.

Policy FNP24 Securing Infrastructure

The inclusion of Policy FNP24 Securing Infrastructure within the Neighbourhood Plan is supported. However, given the importance of the provision of adequate water and wastewater infrastructure set out above, Thames Water recommends the inclusion of the following Policy and supporting text within the Neighbourhood Plan, or that Policy FNP24 is expanded to include the following:

“PROPOSED POLICY - WATER AND SEWERAGE INFRASTRUCTURE CAPACITY:

Planning permission will only be granted for developments which increase the demand for off-site water and wastewater infrastructure where:

1. *sufficient capacity already exists or*
2. *extra capacity can be provided in time to serve the development which will ensure that the environment and the amenity of local residents are not adversely affected.*

In accordance with Planning Policy Guidance, when there is a capacity constraint and improvements in off-site infrastructure are not programmed, planning permission will only be granted where appropriate infrastructure improvements will be completed prior to occupation of the development.

PROPOSED SUPPORTING TEXT:

The Council will seek to ensure that there is adequate water supply, surface water, sewerage network and sewage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to amenity impacts for existing users. In some circumstances this may make it necessary for developers to carry out appropriate appraisals to ascertain whether the proposed development will lead to overloading of existing network infrastructure. Where there is a capacity constraint the Council will require the developer to provide a detailed water and / or drainage strategy informing what infrastructure is required, where, when and how it will be delivered."

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 Utilities Ltd.