From: Natasha Hurley <tasha.hurley@savills.com> On Behalf Of Thames Water Planning Policy Sent: 21 September 2021 09:58

To: Development Brief <developmentbrief@cherwell-dc.gov.uk>

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Subject: Cherwell - Draft Development Briefs - REPONSE ON BEHALF OF THAMES WATER UTILITIES LTD

Dear Sir/ Madam Please find our response to the above attached on behalf of Thames Water. Regards, Natasha Tasha Hurley **Team Administrator** Planning Savills, Ground Floor, Hawker House, 5-6 Napier Court, Napier Road, Reading RG1 8BW :+44 (0) 1189 520 509 Tel Mobile :+44 (0) 79717 63964 tasha.hurley@savills.com Email Website : http://www.savills.co.uk savills





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17 September 2021

Cherwell - Draft Development Briefs

Dear Sir/Madam,

Thames Water are the statutory water supply and sewerage undertaker for the Cherwell District Council area, and are hence a "<u>specific consultation body</u>" in accordance with the Town & Country Planning (Local Planning) Regulations 2012. Thames Water wish to make the following comments pertaining to the draft development briefs for Site PR7b: Land at Stratfield Farm, Kidlington and Site PR9: Land West of Yarnton.

General Water and Wastewater Infrastructure 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 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 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 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 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.

Section 7.1

Section 7.1 refers to the information required to accompany planning applications including Flood Risk Assessments, Drainage Assessments including Water Infrastructure Capacity.

Thames Water offer a free pre-planning service which is available for developers and land owners to discuss their proposals. The following text could be inserted to encourage developers to engage with Thames prior to submitting a planning application:

"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 their free pre-planning service (https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/water-and-wastewater-capacity). This service can tell developers at an early stage if there will be capacity in Thames Water and/or wastewater networks to serve their development, or what they will do if there is not.

The developer can then submit this communication as evidence to support a planning application and Thames can prepare to serve the new development at the point of need, helping avoid delays to housing delivery programmes."

Site Specific Comments

Please find enclosed a table setting out individual comments for the proposed site allocations.

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

Site ID	Site Name	Net Gain to System (I/day)	Net Foul Water Increase to System (I/s)	Property	Net Increase in Demand (I/day)	Net Increase in Peak Demand (I/s)	Net Property Equivale nt Increase - Water
55030	PR7b Land at Stratfield Farm	128304	1.49	120	42000	1.46	120

55029	PR9 Land West of Yarnton	577368	6.68	540	189000	6.56	540

Water Response	Waste Response
The scale of development/s in this catchment is likely to require	Thames Water recognises this catchment is subject to high infiltration flows
upgrades of the water supply network infrastructure. It is	during certain groundwater conditions. The scale of the proposed
recommended that the Developer and the Local Planning Authority	development doesn't materially affect the sewer network, however care
liaise with Thames Water at the earliest opportunity to agree a	needs to be taken when designing new networks to ensure they don't
housing phasing plan. Failure to liaise with Thames Water will	surcharge and cause flooding. In the longer term Thames Water, along with
increase the risk of planning conditions being sought at the	other partners, are working on a strategy to reduce groundwater entering
application stage to control the phasing of development in order to	the sewer networks. Thames Water recognises this catchment is subject to
ensure that any necessary infrastructure upgrades are delivered	high infiltration flows during certain groundwater conditions. The
ahead of the occupation of development. The housing phasing plan	developer should liaise with the LLFA to agree an appropriate sustainable
should determine what phasing may be required to ensure	surface water strategy following the sequential approach before
development does not outpace delivery of essential network	considering connection to the public sewer network. The scale of the
upgrades to accommodate future development/s in this catchment.	proposed development doesn't materially affect the sewer network,
The developer can request information on network infrastructure by	however care needs to be taken when designing new networks to ensure
visiting the Thames Water website	they don't surcharge and cause flooding. In the longer term Thames Water,
https://developers.thameswater.co.uk/Developing-a-large-	along with other partners, are working on a strategy to reduce
site/Planning-your-development.	groundwater entering the sewer network. On the information available to
	date we do not envisage infrastructure concerns regarding wastewater
	infrastructure capability in relation to this site.

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-largesite/Planning-your-development.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. The wastewater network capacity in this area is unlikely to be able to support the demand anticipated from this development. Strategic drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. Where there is a wastewater network capacity constraint the developer should liaise with Thames Water and provide a detailed drainage strategy with the planning application, informing what infrastructure is required, where, when and how it will be delivered