



Planning Policy

Thames Water Utilities Ltd

Sent by email: ldf@haringey.gov.uk

Contact Carmelle Bell
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2 April 2014

Dear Sir/Madam

Re: HARINGEY – SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT (DPD)

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:

Proposed Site Allocations

General Comments on Water Supply and Sewerage/Waste Water Infrastructure:

Thames Water seeks to work closely with the local planning authority to plan for the necessary water supply and wastewater infrastructure to service development in its area.

The information contained within the document is of significant value to Thames Water as we prepare for the provision of future infrastructure. However, the level of information contained does not allow Thames Water to make a detailed assessment of the impact the proposed housing provision will have on local water and wastewater infrastructure. To enable us to provide more specific comments on the site proposals we would value the inclusion of the Council's aspiration for each site. For example, an indication of the type and scale of development together with the anticipated timing of development – i.e. where housing capacity is indicated in square meters an approximate number of

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dwelling is required in order for Thames Water to undertake the necessary assessments.

When carrying out the necessary early consultations with Thames Water regarding the capacity of water and wastewater infrastructure, in respect of development proposals, adequate time should be allowed so that an informed response can be formulated. It is not always possible to provide detailed responses within a matter of days. For example, the modelling of water and wastewater infrastructure will be important to many consultation responses and the time required for responses must not be underestimated. For example, the modelling of sewerage systems can be dependent on waiting for storm periods when the sewers are at peak flows. Therefore, consultation should be undertaken as early as possible with Thames Water regarding the capacity of water and wastewater infrastructure to serve development proposals. Adequate time must be allowed for a high level risk assessment to be undertaken. Should more comprehensive responses be required, it is likely that more detailed modelling work will need to be undertaken. The necessary funding for this work will need to be identified and secured through Developers and/or partnership working. It can take approximately 3 months to complete modelling work from the point funding has been secured.

Specific Sewerage/Wastewater Comments:

The attached table provides site specific comments from desktop assessments on sewerage/wastewater infrastructure, but more detailed modelling may be required to refine the requirements.

In addition, Thames Water supports the approach in the London Plan Section 5.13 (Sustainable Drainage) and the Mayor's sequential approach to surface water run-off and its management as close to source as possible. It is important to reduce the quantity of surface water entering the sewerage/wastewater system in order to maximise the capacity for foul sewage thus reducing the risk of sewer flooding.

Specific Water Comments:

Thames Water will need to investigate the impact of the new development sites within the AAPs on the existing water supply network. A detailed water supply strategy may be required from the developers to determine the exact impact on our infrastructure and any upgrades required to our infrastructure to support the development. Water supply infrastructure may be required to ensure sufficient capacity is brought forward ahead of the development. In the event of an upgrade to our infrastructure being required, there could be a period of 3 or more years required for the delivery of the infrastructure. Alternatively, developers may wish to requisition the infrastructure to deliver it sooner. We may also require a Grampian style planning condition to be attached to ensure that any required infrastructure is in place ahead of occupation of the development. All developers are encouraged to contact Thames Water Developer Services in advance of the

submission of planning applications. Information for Developers on water/wastewater infrastructure can be found on Thames Water's website at: <http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm> Alternatively 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; Telephone on: 0845 850 2777; Email: developer.services@thameswater.co.uk

Proximity of Developments to Thames Water Assets:

On brownfield sites there may be:

- Existing water mains crossing the site. In such cases the developer may be required to pay for any mains diversions and new off-site infrastructure.
- Existing public sewers crossing the site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by an Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.

Where development is being proposed within 800m of a sewerage treatment works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

Where development is being proposed within 15m of a pumping station, the developer or local authority should liaise with Thames Water to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.

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.