



Sent by email: johnfinbarrfox@gmail.com

 thameswaterplanningpolicy@savills.com

 0118 9520 503

23 June 2017

South Oxfordshire – Wheatley Neighbourhood Plan

Dear John,

Thames Water are the statutory water and sewerage undertaker for the South Oxfordshire District and the following comments are made in this respect.

General Comments

New development should 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.”

The new web based National Planning Practice Guidance (NPPG) published in March 2014 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).

Page 16 - Paragraph 3.36 on Sewage

At paragraph 3.36 the Neighbourhood Plan States:

“In February 2017 Thames Water was convicted and heavily fined for contaminating the Rivers Thames and Thames during the period 2013-2014. In addition there has been concern raised in

2015 regarding the capacity of the sewage treatment works when Thames Water had to use seventy tankers a day for five months to ferry untreated sewage to other works in the county. Treated effluent flows into the River Thame. Sometimes raw sewage is discharged too through an open course. (Residents of nearby bungalows have informed the WNP Committee of the smell.) "The storm tanks are not of sufficient capacity" is one explanation proffered by the Wheatley Flood and Drainage Committee [27]. Adequate capacity is a statutory requirement for planners and Thames Water when new housing is under consideration. Treated effluent also has a high nitrate concentration from field and stream run-off. "There is a belief that the nitrate load from the sewage treatment works discharged into the River Thame adversely affects its ecology." [27] Increased flow to the sewage treatment works from new development may increase nitrate discharge into the River Thame. The normalising of greenfield site run-off levels on a new development can be achieved by ground infiltration, on-site storage and capture of run-off water for domestic use through new house design. In many locations, Wheatley heavy clay is not readily porous."

Wheatley STW was not included within the recent prosecution case for pollution during the period 2013-2014, and we have no records/information to indicate that Wheatley STW has had a pollution incident since this time. The opening sentence of this section is misleading and is negatively biased within the context of the neighbourhood plan and the catchment as a whole, and as such we would like to see it removed.

In relation to the capacity of the storm tanks and or the wider capacity of the STW as a whole we have the following comments. During periods of storm, once our storm tanks have reached their capacity, it is common practice to discharge stormed flows from site in a controlled and managed procedure. This will only be done for as long as is necessary as per our storm discharge permits issued by the Environment Agency (EA). When we last modelled Wheatley STW in 2012, it indicated that we had a single storm tank with a capacity of 226.48m³. During our Asset Management Period 2010-2015 (AMP5) we invested in a new 117.43m³ storm tank to work in parallel with the original tank. This site now has a total storm tank volume of 343.91m³, which is more than the EA required 68l/hd storage volume based upon 332m³ of a 4,876 PE on the 2021 AMP5 design horizon.

The most recent model was produced in 2009. It has been used to understand the growth within the catchment. The impact that this may have on the STW is due to be considered during the summer (2017). The output from this report will allow us to identify if any further upgrades are required at the works in light of the expected growth within the catchment.

Omission of a Policy on Water and Wastewater Infrastructure

In light of the above and the concerns raised in by the Neighborhood Plan we consider that as this issue is so important that there should be a section on 'Infrastructure and Utilities' in the Wheatley Neighbourhood Plan which should make reference to the following:

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 therefore recommend that developers engage with them at the earliest opportunity to establish the following:

- The developments demand for water supply and network infrastructure both on and off site and can it be met
- The developments demand for Sewage Treatment and network infrastructure both on and off site and can it be met
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met

Thames Water should also be consulted regarding proposals involving building over or close to a public sewer. If building over or close to a public sewer is agreed 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 or water mains to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989.

Further information for Developers on sewerage and water infrastructure can be found on Thames Water's website at: <https://developers.thameswater.co.uk/>

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: 0800 009 3921; or

by email: developer.services@thameswater.co.uk"

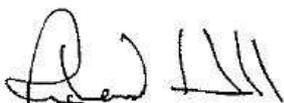
or

In a section on 'Infrastructure and Utilities' a statement similar to that set out below:

As per policy CS11 (Infrastructure Provision) of South Oxfordshire adopted Core Strategy, 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.

We hope this is of assistance. If you have any questions please do not hesitate to contact Carmelle Bell on the above number.

Yours sincerely



Richard Hill
Head of Property