South Northamptonshire (Part 2) Local Plan Draft Submission Consultation

Dear Sir / Madam

Thank you for consulting Thames Water on the above document. Further to our online submission I have summarised our comments on the draft Submission Local Plan below.

Thames Water is the statutory sewerage undertaker for a small part of South Northamptonshire to the south west of the District and are hence a “specific consultation body” in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Background

Policy BN7A of the West Northamptonshire Joint Core Strategy relates to water supply, quality and wastewater infrastructure. The policy states that new development proposals will ensure that adequate water and wastewater infrastructure is available to meet the additional requirements place upon it by development.

It should be noted that the way in which wastewater network reinforcement works necessary to support new development is delivered changed on the 1st April 2018. A position statement is attached for information setting out the change of approach. As a result of this change we are seeking to encourage developers to engage with us prior to the submission of any planning applications to discuss the drainage requirements. Where there are concerns regarding capacity or no discussions have taken place we may seek phasing conditions to be applied to any approval to ensure that development is not occupied until any necessary network reinforcement works have been delivered.

Thames Water have the following comments on the submission consultation:

Policy SS2 General Development Principles

In relation to Policy SS2(g) it is considered that the wording of the requirement should be amended to ensure that the policy also covers the issue of odour and existing development. New development should not be provided in locations where it will be affected to existing sources of noise, odour or vibration unless adequate mitigation measures are put forward and
secured through any permission. In order to achieve this it is suggested that Policy SS2(g) is revised to read:

“will result in adequate standards of living for future occupiers and will not unacceptably harm the amenity of occupiers and users of neighbouring properties and the area through noise, odour, vibration, overshadowing or result in loss of privacy or loss of sunlight and daylight or through location close to existing sources of such nuisances unless adequate mitigation measures are proposed and secured; and”

Where development is being proposed within 800m of a Thames Water sewage 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.

We support the requirements set out in Policy SS2(l) and (m). In order to ensure the delivery of any necessary wastewater infrastructure reinforcement works we have put forward additional policy and supporting text in relation to Policy INF1 which would work with Policy SS2 and Policy BN7A of the Joint Core Strategy to ensure the delivery of any necessary infrastructure ahead of the occupation of development.

**Policy INF1 on Infrastructure Delivery**

Policy INF1 of the Part 2 Local Plan relates to infrastructure delivery and funding. Thames Water will be responsible for funding and delivering any necessary wastewater reinforcement works necessary to support new development. At present this is not supported through Policy INF1 which focuses on infrastructure directly delivered by developers or funded through S106 contributions or the CIL.

In order to ensure that the new part 2 Local Plan will be effective at ensuring the delivery of any necessary wastewater reinforcement works required to support new development, long term management and environmental improvements it is considered that a fourth point should be added to Policy INF1 stating:

“Wastewater infrastructure reinforcement works necessary to support new development and ensure compliance with Policy BN7A of the JCS will be supported. The delivery of new wastewater infrastructure necessary to support growth, support long term wastewater management or deliver environmental improvements will normally be permitted provided that the need for such facilities outweighs any adverse land use or environmental impact and that any such adverse impact is minimised.”

It is also considered that the following supporting text should be added to provide surety that any new wastewater infrastructure reinforcement works will be delivered ahead of the occupation of development to avoid adverse impacts such as sewer flooding or the pollution of land and watercourses:
“Developers are encouraged to contact their wastewater service provider as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential 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.”

We would welcome the Council’s support in encouraging developers to liaise with us prior to the submission of any planning application to assist with the identification and planning of any necessary infrastructure upgrades. Developers can request information on network infrastructure and access our free pre-planning service by visiting the Thames Water website at:

https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development

We trust the above is satisfactory, but please do not hesitate to contact Thames Water if you have any queries.

Yours sincerely

Richard Hill
Head of Property