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 David Wilson



12th October 2020

## Central and Eastern Berkshire - Joint Minerals & Waste Plan - Regulation 19 Proposed Submission Consultation

Dear Sir/Madam,

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 sewerage undertaker for Berkshire and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012.

Further to our responses to previous versions, we have the following comments on the consultation document:

### **Policy W3 & supporting paragraphs - SUPPORT**

Thames Water support the policy which has been amended to refer to waste water and sewage treatment (rather than just sewage sludge).

Wastewater/sewage infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses.

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 20 of the revised National Planning Policy Framework (NPPF), February 2019, 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 revised 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 web based National Planning Practice Guidance (NPPG) 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).

#### **Policy W4 - SUPPORT**

Thames Water support part 2 (b) (iv) of the policy in principle which identifies land at or adjoining sewage treatment works as being suitable for waste development which enables the co-treatment of sewage sludge with other wastes. However, clearly a key consideration will be that any such proposals must not detrimentally impact upon the existing Sewage Treatment Works operations and must be subject to an appropriate odour impact assessment.

#### **Appendix A – Allocated Sites - OBJECTION**

##### **OMMISSION of Ham Island Site – Sand and Gravel - OBJECT**

The site was identified as a Proposed Site in the previous version of the plan, but has not been included in the Submission version.

We consider that additional sites need to be allocated to ensure an adequate supply and hence the allocations do not meet the test of consistency with national policy.

The Ham Island site is owned by Thames Water leased to a 3rd party. The site is adjacent to the operational Ham Island Sewage Treatment Works. The site was also identified as a potential borrow pit for gravel extraction in association with the Heathrow Airport 3<sup>rd</sup> Runway construction. Thames Water supported the identification of the site as a potential borrow pit site and support its allocation as a gravel extraction site in the Minerals Plan.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully

Thames Water Utilities Ltd