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Independent Examination of the Local Plan 2045
Inspectors' Matters, Issues and Questions for Examination Stage 2

Dear Sir/Madam,

Please find below our Hearing Statement in relation to Matters 10- Climate Change; Matter 11 – Infrastructure and Viability; and Matter 13 – Design and Heritage .

I confirm that we do not wish to participate in the Hearing session Hearings, however, provide the following clarifications in relation to the questions set out in the MIQ's which relate to water and wastewater infrastructure.

Matter 10 – Climate Change
Issue 5 – Resilient Design and Construction – Policy G9
Q1 Is it sufficiently clear to users of the Plan what is required of development proposals under Policy G9, such as "measures to ensure water is used prudently" and "supporting infrastructure which is designed to function in extreme weather conditions"? Is the policy effective?

We supported Policy G9 (d) where it refers to water efficiency in line with our comments to Policy R5.

The Environment Agency has designated the Thames Water region to be an area of "serious water stress" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. On average our customers each use 30% more water than they did 30 years ago. Therefore water efficiency measures employed in new development are an important tool to help us sustain water supplies for the long term.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the enhanced mains water consumption target of 100 litres per head per day and support the inclusion of this requirement in Policy.

The new NPPF, August 2026, also sets out that tighter water efficiency standards can be met. Policy PM13 1.b.ii. states: ii. "Water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent local standard in areas of serious water stress".

Policy CC1 1.c. states: “Setting local water efficiency standards for new development where these are justified in accordance with policy PM13”.

Policy PM13 b.ii. states: ii. “Water efficiency, for which it may be appropriate to apply the tighter Building Regulations optional requirement where justified, or exceptionally a more stringent
local standard in areas of serious water stress”.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link:
https://www.thameswater.co.uk/Be-water-smart

It is our understanding that the enhanced water efficiency standards of 110 litres per person per day referred to in the NPPG **is only applied through the building regulations where there is a planning condition requiring this standard** (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the ‘Calculation Method’ or the ‘Fittings Approach’ (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Matter 11 – Infrastructure and Viability
Issue 1 – Infrastructure Delivery – Policy S3
Q1 Does the Plan make sufficient provision for infrastructure as required by paragraph 20 of the Framework, having particular regard to infrastructure for transport, water supply, wastewater and community facilities?

Policy S3 requires developers to engage early with infrastructure providers and demonstrate that they have explored existing infrastructure capacity and made sufficient provision to support development.

Thames Water supports early engagement as this is important to identify whether adequate water and wastewater network and treatment capacity exists to serve development and whether any reinforcement or upgrade works are required.

The revised National Planning Policy Framework (NPPF), August 2026, includes a new Section ‘10.Securing clean energy and water’.

Policy W1 in relation to plan-making policies sets out that LPAs should engage early with utility providers: “*The development plan should be informed by early engagement between the relevant plan-making authority, utility providers, regulators and network operators, so that there is a clear understanding of energy supply and network capacity, water supply, drainage and wastewater capacity, and associated requirements for additional infrastructure provision. This engagement should consider the impacts of planned growth, changing consumption patterns and climate change, as well as relevant strategic infrastructure plans, and be used to address potential constraints to development arising from current or anticipated infrastructure shortfalls*.”

Policy W1 goes on to require that: “2. The development plan should reflect this at the most appropriate level by: b. Making provision for development which is required for new or enhanced renewable and low carbon energy development, electricity network infrastructure, water supply, drainage and wastewater infrastructure, whether as part of wider development proposals or as stand-alone developments; and

c. Setting out any measures to avoid constraints on the operation or future expansion of renewable and low carbon energy development and electricity network infrastructure and water supply and wastewater infrastructure as a result of neighbouring (or nearby) development."

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).

It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment & Water Treatment Works upgrades can take 3-5 years.

Matter 13 – Design and Heritage
Issue 5 – Living Conditions – Policies R8, HD8, HD9 and HD10
Q1 Policy R8 states that planning permission will not be granted for sensitive development close to the Sewage Treatment Works, unless it is accompanied by a technical assessment, prepared in consultation with Thames Water, that shows there will be no adverse amenity impact on future occupiers of the proposed development or that sufficient mitigations can be incorporated to ensure that any potential for adverse impact will be avoided. What is the justification for this requirement and is the policy sufficiently flexible enough to be effective?
Q2 Is it sufficiently clear what is meant by 'sensitive development' for the purposes of Policy R8? How will the policy be implemented and how will it be effective?

We supported Policy R8.

Where development is being proposed within 800m of a sewage treatment works or 20m of a sewage pumping station, 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/pumping station.

Policy P4 : Impact of development on existing activities of the NPPF 2026 sets out that:
"2.Where the operation of an existing activity could have a significant adverse effect on a proposed new development in its vicinity, development proposals should:
a.Identify the nature of the potential impacts, informed where necessary by early discussions between the applicant (i.e. the 'agent of change') and those existing uses which could be affected by the proposal to inform the scope for mitigation; and
b. Be able to demonstrate that suitable mitigation can be provided before first occupation of the development, if it is to be acceptable. Planning conditions or obligations should be used to secure agreed mitigation measures."

The online PPG states at Paragraph: 005 Reference ID: 34-005-20140306 that: "Plan-making may need to consider: ….whether new development is appropriate near to sites used (or proposed) for water and wastewater infrastructure (for example, odour may be a concern).."

The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. We therefore support the text at the end of Policy R8.

Yours faithfully,

David Wilson
Thames Water Property Town Planner