

Christine Whyte

From: Thames Water Planning Policy <ThamesWaterPlanningPolicy@savills.com>
Sent: 14 September 2015 14:31
To: Local Plan
Cc: Chris Colloff; 'Nicky Mchugh'; 'Mark Mathews'
Subject: Hertsmere Site Allocations and Development Management DPD Consultation
Attachments: 15.09.14 L CC Hertsmere Site Allocations and Development Management Resp....docx; 15.09.14 R CC Hertsmere SADM S4.37 response.docx; 15.09.14 R CC Hertsmere SADM1 response.docx; 15.09.14 R CC Hertsmere SADM18 response.docx

Dear Sir/Madam,

Please find our response to the above attached on behalf of Thames Water.

Regards,

Katherine Jones
Planning Administrator
Planning

Savills, Ground Floor, Hawker House, 5-6 Napier Court, Napier Road, Reading, RG1 8BW



Tel : +44 (0) 1189 520 509
Email : KJones@savills.com
Website : www.savills.co.uk



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who may seek to rely upon it, as a whole or any part as such. If formal advice is required this will be explicitly stated along with our understanding of limitations and purpose.

Site Allocations and Development Management Policies Plan (SADM)

Publication Stage Representation Form

For office use
only

Reference No:

Date received:

Please use this form to make Representations

Please return to Hertsmere Borough Council by 5pm on Monday 14 September 2015

By post: Policy and Transport Team, Planning and Building Control, Hertsmere Borough Council,
Civic Offices, Elstree Way, Borehamwood, Herts, WD6 1WA.

By email: local.plan@hertsmere.gov.uk

This form has three parts:

Part A – Personal details (only needed once).

Part B – Your representation(s). Please complete a separate sheet (Part B) for **every** representation you wish to make, remembering to insert your or your organisation's name at the top of the page.

Part C – What information you want the Council to provide you with about future progress of SADM (only needed once).

Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).

Part A	1. Personal details*	2. Agent details (if applicable)
Title	Mr	Mr

First name	Mark	Chris
Last name	Mathews	Colloff
Job title (where relevant)	Town Planning Manager	Associate
Organisation (where relevant)	Thames Water	Savills
Address	c/o agent	Hawker House Napier Court Napier Road Reading
Post Code		RG1 8DB
Telephone number		01189 520502
Email address		Thameswaterplanningpolicy@savills.com

*If an agent is appointed, please enter the person and/or organisation being represented in column 1 and complete all contact details in column 2.

Please note that all representations received will be made publicly available and cannot be treated as confidential. This means that the names of all those making representations will be publicly available. Other personal information relating to private individuals, including Contact details, will not however be made publicly available.

Part B		<u>For office use only</u>
Name or organisation:	Thames Water	Ref No:
		support:
		object:
		change:

IMPORTANT: Please use a separate Part B form for each representation

3. To which part of SADM ('the Plan') does this representation relate?

Paragraph		Policy	SADM1	Policies Map		Other part of Plan (specify)	
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4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:

Please tick which boxes apply

4(a) Legally Compliant Yes ☒ No ☐ no comment to make ☐

4(b) Compliant with the Duty to Co-operate Yes ☒ No ☐ no comment to make ☐

4(c) Sound Yes ☒ No ☐ no comment to make ☐

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

5. If you consider the Plan to be unsound is this because it is not:

5(a) Positively prepared ☐ Please tick which box(es) apply

5(b) Justified ☐

5(c) Effective ☐

5(d) Consistent with national policy ☐

6. If you consider the Plan is not legally compliant or fails to comply with the Duty to Co-operate or, having regard to the criteria you ticked at 5 above relating to soundness is unsound, please give details of why. Please be as precise as possible.

If you wish to comment in support of the Plan's legal compliance, compliance with the Duty to Co-operate or soundness or wish to make any other comment, please also use this box.

7. Please set out as precisely as possible what change(s) you consider necessary to make the Plan

- legally compliant or**
- sound (having regard to the criteria you ticked at 5 above relating to soundness).**

You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text.

The text for site H11 should be updated in line with the latest assessment from Thames Water.

(continue on a separate sheet/expand box if necessary)

The addition of references to the need to assess waste water infrastructure capacity within the site specific requirements is supported. Up to date comments on the specific sites are attached in the covering letter. It should be noted that there are concerns in relation to waste water network capacity for site H11 and as such text on the need for assessment of waste water capacity should be added to the site specific requirements for this site.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity for further submissions based on the representation you are currently making. **After this current publication stage, further submissions will only be able to be made at the Inspector's request, based on the matters and issues he/she identifies for Examination.**

8. If you do not consider the Plan to be sound and the Council is prepared to make changes to the Plan which reflect your suggested change, would you be prepared to enter into a 'Statement of Common Ground' with this Council?

Yes ☐ No ☐

9. If your representation is seeking a modification/change to the Plan, do you consider it necessary to participate at the oral part of the Examination?

No, I do not wish to participate at the oral Examination

☒

Yes, I wish to participate at the oral Examination

☐

10. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

(continue on a separate sheet/expand box if necessary)

Please note: the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the Examination.

Signature: C Colloff Date: 14/09/2015

Part C

(Only needed once)

Name (Print): Chris Colloff

☒

If you wish to be informed of the date of the submission of the Plan to the Secretary of State, please tick this box.

☒

If you wish to be informed of the recommendations of the Inspector appointed by the Secretary of State to carry out the independent Examination of the Plan, please tick this box.

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If you wish to be informed of the adoption of the Plan by Hertsmere Borough Council please tick this box.

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Part C – What information you want the Council to provide you with about future progress of SADM (only needed once).

Please read the guidance notes at the end before completing this form. They explain the terms used and will help you make your representation(s).

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Title	Mr	Mr

First name	Mark	Chris
Last name	Mathews	Colloff
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Name or organisation:	Thames Water	Ref No:
		support:
		object:
		change:

IMPORTANT: Please use a separate Part B form for each representation

3. To which part of SADM ('the Plan') does this representation relate?

Paragraph	4.37	Policy		Policies Map		Other part of Plan (specify)	
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4. In relation to the part of the Plan you identified in 3, do you consider the Plan to be:

Please tick which boxes apply

4(a) Legally Compliant	Yes	☒	No	☐	no comment to make	☐
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4(b) Compliant with the Duty to Co-operate Yes ☒ No ☐ no comment to make ☐

4(c) Sound Yes ☐ No ☒ no comment to make ☐

If you have entered 'No' to 4(c), please continue to Q5. In all other circumstances, please go to Q6.

5. If you consider the Plan to be unsound is this because it is not:

5(a) Positively prepared ☐ Please tick which box(es) apply

5(b) Justified ☐

5(c) Effective ☒

5(d) Consistent with national policy ☐

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It is suggested that the section is revised as follows:

*“Sewer flooding can arise due to lack of capacity within the existing sewer network. The Council will work with Thames Water **and developers** in order to ensure that the strategic wastewater infrastructure required to support growth will be delivered alongside development. ~~However~~ **It is also** important for developers to consult Thames Water **at an early stage to discuss waste water infrastructure requirements for development** (see section on Water Supply and Waste Water).”*

(continue on a separate sheet/expand box if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting

Section 4.37 relates to sewer flooding and while the section cross references the water supply and waste water sections of the DPD which provide more policy and supporting text in relation to waste water infrastructure it is considered that the text in section 4.37 is ambiguous.

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Yes ☐ No ☐

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Signature: C Colloff Date: 14/09/2015

Part C

(Only needed once)

Name (Print): Chris Colloff

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3. To which part of SADM ('the Plan') does this representation relate?

Paragraph	4.44-9	Policy	SADM18	Policies Map		Other part of Plan (specify)	
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Thames Water support the text in sections 4.44 to 4.49 and Policy SADM18 which relate to water supply and waste water.

(continue on a separate sheet/expand box if necessary)

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(Only needed once)

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