

Written Statement to the Draft London Plan

on Matter M74

Air Quality and Water Infrastructure

February 2019

Thames Water Utilities Ltd

Representation Number 2491

MATTER M74 AIR QUALITY AND WATER INFRASTRUCTURE.

Policy 5.14 Water Quality and Sewage Infrastructure

M74. Would the policies for air quality and water infrastructure assist in creating a healthy city in accordance with Policy GG3 and provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the individual policies and detailed criteria justified and necessary and would they provide an effective basis for development management? In particular:(b) Will Policy SI5 ensure adequate provision for water infrastructure and encourage a sustainable use of resources? Is the requirement to use the optional requirement of the Building Regulations justified?

- 1.1 Thames Water submitted a detailed response to Policy SI5 and other policies of the draft London Plan. Those representations are not repeated in this statement, but should be read in conjunction with this statement.
- 1.2 Thames Water support Policy SI5 in principle which sets out the Mayor's position that he will help to ensure that London has adequate water and wastewater infrastructure, but have suggested a number of amendments. A number of these suggested amendments have been incorporated in the Mayor's Minor Suggested Changes to the Draft London Plan.
- 1.3 Thames Water support the following Minor Suggested Changes to Policy SI5 and supporting text:

MSC.9.56; MSC.9.57; MSC.9.59; MSC.9.62; MSC.9.63; MSC.9.64; MSC.9.65; MSC.9.66 and 9.67.
- 1.4 Suggested Minor Change MSC.9.58 is also supported, but the water consumption figures will need updating in line with the latest figures.
- 1.5 Suggested Minor Change MSC.9.60 is also supported, but the references to Thames Water's draft Water Resource Management Plan (WRMP) will need amending in light of Thames Water's most recent revised draft WRMP.
- 1.6 A number of amendments that Thames Water suggested to Policy SI5 have not been incorporated, but it is considered that they should be incorporated to ensure Policy SI5 provides the best framework to ensure adequate provision for water and wastewater infrastructure:

- We consider that as Policy SI5 covers both water supply and wastewater treatment infrastructure in an integrated way, the title should be amended to reflect this i.e. Policy SI5 Water and **Wastewater** Infrastructure.
- Policy SI5 Part B should be amended to require that Development Plans **support** new water treatment infrastructure so that it is consistent with Part D 2) in relation to wastewater.
- Policy SI5 Part D 2) reference to smart technologies needs to include reference to not entailing excessive cost.

1.7 The increase in London's population will increase both the flow of wastewater, and the waste load that needs to be treated by the receiving Sewage Treatment Works (STW). Significant improvements to Thames Water's STWs have been carried out between 2010 and 2015, including at Thames Water's largest sewage works (Crossness, Mogden, Beckton, Longreach and Riverside) where the improvements allow a greater proportion of wastewater entering the treatment works to pass through the full treatment process with the wastewater treated to a higher degree. This is helping to maintain a high level of water quality in the River Thames and the Tideway Tunnel, which is under construction, will lead to further improvements.

1.8 In North London a significant upgrade of Deephams STW to enable the STW to treat more existing flow and to a higher quality is nearing completion.

1.9 Further STW upgrades are now being planned for AMP7 (2020-2025) including at Beckton STW. In this respect, we support Policy SI5 D 2) as amended by suggested change MSC.9.56. However, In developing proposals to upgrade London's water and sewage infrastructure Thames Water appraise best available technology against the regulated economic framework and the Ofwat aim to keep customers bills affordable. Therefore, the reference to smart technologies within the policy needs to include reference to not entailing excessive cost.

(b)Is the requirement to use the optional requirement of the Building Regulations justified?

1.10 Thames Water consider that the use of the optional requirement of 105 litres per person per day of the Building Regulations is wholly justified as the Environment Agency have classified London as seriously water stressed. London also has the largest proposed growth in the country and therefore it is unlikely that there is another area with a stronger justification. The optional requirement was also examined as

part of the preparation of the current London Plan and was deemed to be justified and is included in the current London Plan, March 2016.

- 1.11 Policy 5.15 of the current London Plan relates to Water Use and Supplies and sets out that: *“The Mayor will work in partnership with appropriate agencies within London and adjoining regional and local planning authorities to protect and conserve water supplies and resources in order to secure London’s needs in a sustainable manner by: (a) minimising use of mains water..”*
- 1.12 Paragraph 5.61 which supports Policy 5.15 goes on to state: *“...To ensure London’s future water security, the prudent use of water will be essential: all new development will need to be water efficient. Residential development should be designed so that mains water consumption would meet a target of 105 litres or less per head per day, excluding an allowance of 5 litres or less per head per day for external water use. This reflects the ‘optional requirement’ set out in Part G of the Building Regulations. As all water companies that serve London are located in areas classified as seriously water stressed, the ‘optional requirement’ should be applied across London. A fittings-based approach should be used to determine the water consumption of a development. This approach is transparent and compatible with developers’ procurement and the emerging Water Label, which Government and the water companies serving London are supporting.”*
- 1.13 Thames Water understand that the water efficiency standard of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard. As the Thames Water area is defined as seriously 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.
- 1.14 To ensure that this water efficient standard is included in a condition in all planning permissions the following additional text should be added to paragraph 9.5.2 of the draft London Plan: ***“...The Boroughs should include a policy in their Development Plans which requires planning conditions to be applied to new residential development to ensure that the 105 litres per person per day water efficiency standards are met.”***