

Planning Policy

Thames Water Property Services

Woking Borough Council
Civic Offices
Gloucester Square
Woking
Surrey GU21 6YL

Your ref
Our ref 8042/96/dw/gac
Name Georgie Cook
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1 December 2006

Woking Borough Council Core Strategy Submission Draft

Dear Sir or Madam:

Thank you for consulting Thames Water Utilities regarding the above. As you will be aware from previous representations Thames Water Utilities are the statutory sewerage undertaker for the Borough. Our comments on the submission Core Strategy DPD are as follows:

Policy GDC7 – Water and Sewerage Infrastructure Capacity: SUPPORT

Thames Water fully support the new Policy GDC7 on water and sewerage infrastructure capacity as it is line with the representations we made to the Preferred Option version.

As previously stated, we consider that such a Policy is necessary to meet the tests of "soundness" as set out in PPS 12. In December 2005 The Planning Inspectorate published "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents". The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs.

The most relevant key question under Conformity Test iv (a) is:

"Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?" A key source of evidence which is identified in answering this question is: ***"Evidence - Of particular significance,***

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will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible”.

There are also a couple of relevant key sources of evidence identified in answering Coherence Test number (vii). The sources of evidence are:

“If the DPD is a Core Strategy, the following documents, amongst other evidence, may be relevant:infrastructure providers’ investment programmes and strategies; environmental programmes etc.”

Policy GB1 - Green Belt: OBJECT

Thames Water consider that Woking Sewage Treatment Works (STW) (as identified on the enclosed plan) should be identified as a major existing developed site (MDS) in the Green Belt so as to permit infilling or redevelopment. Paragraph C1 of Annex C to PPG2, 1995, clearly refers to water and sewage treatment works as being major developed sites.

As this key Green Belt Policy is contained in the core strategy, it is considered that it would be clearer to also identify/list the MDSs in the core strategy, rather than in the site allocations DPD as suggested by the council.

Thames Water’s experience at other strategic sewage and water treatment sites in the Green Belt has been that the lack of recognition of the functions of sewage and water treatment, which are often located near but outside the built up area, often leads to delay in gaining consents for essential operational development. In this case there is no alternative land within the Borough to site such a development and sewage treatment will continue at Woking STW and therefore modernisation and upgrading of the plant at the site will be needed. It is also clear from the development proposed in the Core Strategy that the expansion of the STW may be required. This may involve the provision of new or replacement buildings, the erection of which falls outside our permitted development rights under the 1995 General Permitted Development Order.

We try to keep local authorities informed of all of our future operational requirements, but we cannot always predict the land use impacts of new European and UK requirements relating to waste water treatment. We cannot therefore predict all operational development which may be needed over the plan period. Also as mentioned above water companies’ investment plans are approved by Ofwat on a 5 yearly basis (the Asset Management Plan process). We are currently in the AMP4 period which runs from 1st April 2005 to 31st March 2010 and this does not therefore cover the LDF period to 2017.

The Woking STW measure approximately 27 hectares and incorporate significant built development. The justification for giving Major Developed Site (MDS) status to Woking STW is derived from PPG2. PPG2 is clear and unambiguous in referring to major developed sites such as water and sewage



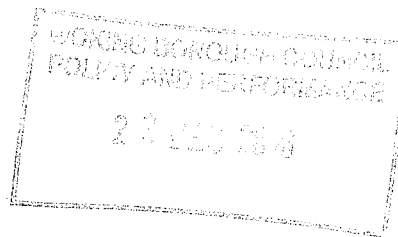
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treatment works. Thames Water have numerous other sites throughout the south east which are located within the Green Belt and which have been given MDS status in adopted Local Plans and Unitary Development Plans.

Yours Faithfully

A handwritten signature in black ink, appearing to read "Georgie Cook".

Georgie Cook
Planning Administrator
Thames Water Property Services.



Mr Nick Griffin

Woking Borough Council
Civic Offices
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Woking
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Thames Water Property Services

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21 December 2006

Woking Borough Council Core Strategy Submission Draft

Dear Mr Griffin

Thank you for your letter dated 20th December regarding the above. I respond as follows:

- I apologise for not including a plan (although one was included at the Preferred Options stage) and I enclose a map of the proposed Woking MDS as requested.
- We consider that a sustainability appraisal is not required as we are not actually promoting a site for development. We are promoting the "identification" of Woking STW as an existing MDS in the Green Belt in accordance with the guidance in Annex C of PPG2. Paragraph C1 states that: *"Green Belts contain some major developed sites such assewage treatment works..... These substantial suites may be in continuing use or be redundant."* Woking STW is still in use and is likely to remain so for the foreseeable future. The identification of the site as an MDS does not automatically mean that development will be approved as it will still need to meet the criteria as set out in Annex C off PPG2 and the policies in the LDF. It is therefore not understood why a sustainability appraisal has been requested.
- Regarding how our site complies with the tests of soundness this is again supported by the guidance in Annex C of PPG2 as referred to above. If it were unsound to allow the identification of MDSs then surely the guidance in PPG2 would have been withdrawn? In addition we would draw your attention to "Development Plans Examination – A Guide to the Process of Assessing the Soundness of Development Plan Documents", December 2005. The Guide sets out a series of 'key questions and evidence requirements' at section 1.4 which aim to provide a framework for the assessment of soundness of DPDs.

The most relevant key question under Conformity Test iv (a) is:

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“Key Question - Has adequate account been taken of the relationship between the proposals in the DPD and other requirements, such as those of utility companies and agencies providing services in the area including their future plans or strategy and any requirements for land and premises, which should be prepared in parallel?” A key source of evidence which is identified in answering this question is: “Evidence - Of particular significance, will be representations from bodies that consider that the DPD either does or does not have sufficient regard to other relevant strategies for which they are responsible”.

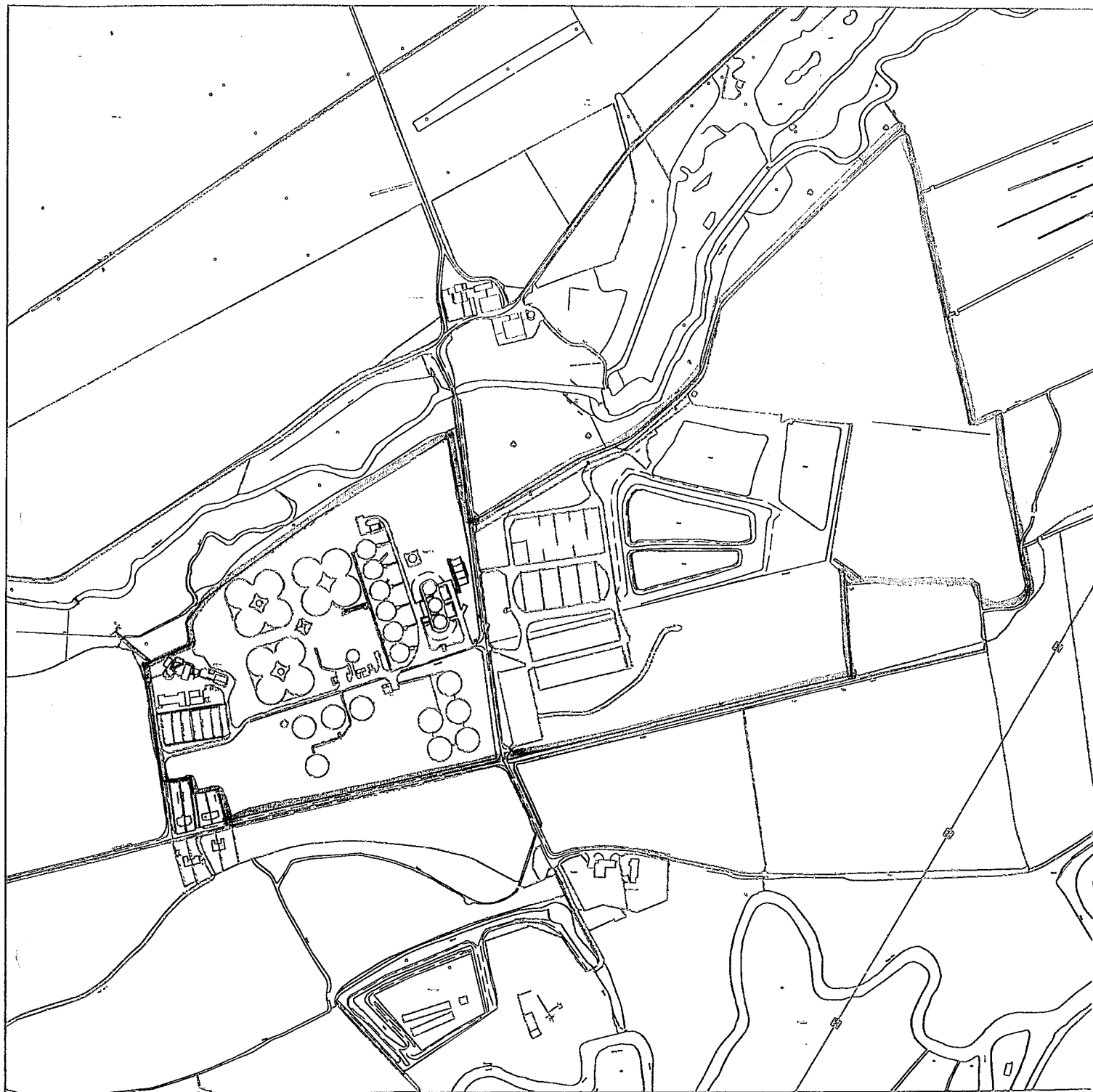
The water companies' investment programmes are based on a 5 year cycle known as the Asset Management Plan (AMP) process. We are currently in the AMP4 period which runs from 1st April 2005 to 31st March 2010 and does not therefore cover the whole LDF period.

It is considered that the MDS designation will help facilitate any necessary future upgrades at Woking STW which require planning permission and therefore meets Conformity Test iv (a) .

Yours faithfully

A handwritten signature in black ink, appearing to read "David Wilson", with a long horizontal stroke extending to the right.

David Wilson
Senior Planner
Thames Water Property Services



The position of the apparatus shown on this plan is given without obligation and warranty, and the accuracy cannot be guaranteed. Service pipes are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by Thames Water for any error or omission. The actual position of mains and services must be verified and established on site before any works are undertaken.

1000 metre intervals

EAGLE hardcopy facility - Normal Map.

The plot is centred on (502981 , 157536), which is in TQ0257NE. Printed on 1 March 2006 at 15:22:25 by DWILSON.

Comments:

Proposed MDS