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7th September 2017

Dear Sir/Madam

Richmond upon Thames Local Plan Examination 2017

Please find below our Hearing Statement in relation to the following Hearing/Question:

Hearing 5 9th October
Character and Design. Green Infrastructure. Climate Change

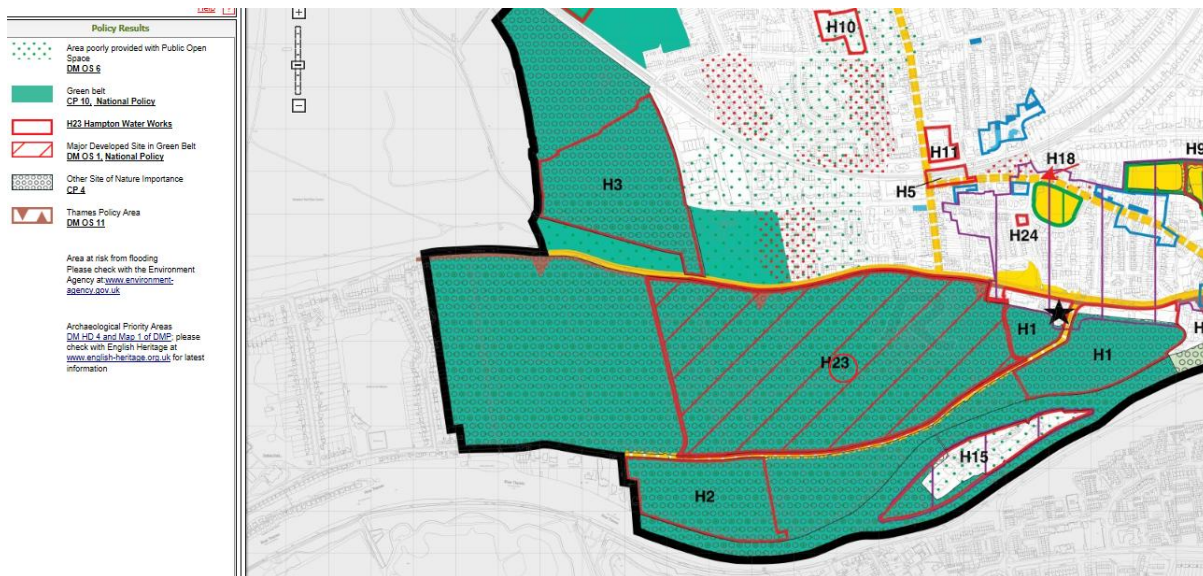
Question 9. Is the Local Plan's approach to Green Belt and MoL justified, consistent with national policy and in conformity with the London Plan? Are alterations to the Policies Map necessary?

Thames Water Hearing Statement

I confirm that we do not propose to attend the hearing session, but will rely on our written representations.

Policy LP13 – Green Belt, Metropolitan Open Land and Local Green Space

Thames Water do not object to Policy LP13 in principle, but consider that it is important that Hampton Water Treatment Works (WTW) is continued to be identified as a Major Developed Site (MDS) in the Green Belt as per the current adopted plan. Please see extract below from adopted Local Plan Proposals Map, July 2015:



The operational Hampton WTW occupies 74.3 hectares (183.6 acres), is Thames Water's second largest works and is of strategic importance for London's water supply. It will be inevitable that further upgrades will be required over the plan period to increase capacity to meet growth being proposed in the London Plan and Local Plans or meet new treatment standards.

Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: ***“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”***

Paragraph 162 of the NPPF relates to infrastructure and states: ***“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”***

The web based National Planning Practice Guidance (NPPG) published in March 2014 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 5.14 of The London Plan, March 2015 is directly relevant as it relates Water Use and Supplies and states: ***“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:maintaining and upgrading water supply infrastructure....new development for sustainable water supply infrastructure, which has been selected within water companies' WRMPs will be supported.”***

Policy Site HA2 Hampton Water Treatment Works, of the earlier Richmond Site Allocations plan did identify Hampton WTW as a Major Developed Site. The justification text in the earlier Site Allocations plan was very similar to the wording of Policy ENV 2 (A) of the UDP adopted in March 2005. It is therefore considered that the justification for identifying the site is still valid.

The Council's justification for no longer identifying Hampton WTW as a MDS in response to our objection to Policy LP13, is basically that the NPPF policy at paragraph 89 and Policy LP13 allow for exceptions to be made to Green Belt policies.

The wording in Policy LP13 relating to utility infrastructure is supported in principle i.e. "***B. It will be recognised that there may be exceptional cases where inappropriate development such as small scale structures may be acceptable, but only if it:***

- 1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land; and***
- 2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses; or***
- 3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land."***

However, this still treats such operational development as inappropriate development and does not provide clarity as the previous MDS designation and accompanying policy do.

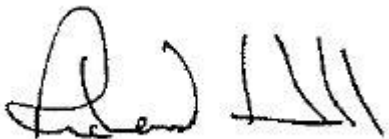
There is nothing in the NPPF that sets out that Local Plans can no longer identify existing MDSs in the Green Belt. Thames Water have a number of other sites which have been continued to be identified as Major Developed Sites in new Local Plans. For example, Royal Borough of Kingston upon Thames are continuing to identify Hogsmill Sewage Treatment Works as an existing Major Developed Site. Policy HV1 Hogsmill Valley Key Area of Change of the adopted Core Strategy, April 2012, sets out that Hogsmill Sewage Treatment Works be identified as Major Developed Site in MOL. Kingston Council are continuing to identify the STW as a MDS in the new Local Plan.

Such MDS designation tends to facilitate the planning process for operational development, whereas without it very special circumstances need to be justified and this can delay the planning process and the implementation of essential infrastructure.

Proposed Change

Thames Water therefore consider that Hampton WTW should still be specifically identified in Policy LP13 and on the Policies Map as a Major Developed Site in the Green Belt as per the current adopted plan (see extract above).

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Richard Hill', written over a light blue horizontal line.

Richard Hill
Head of Property at Thames Water