

Planning Policy Surrey Heath Borough Council

By email: planning.consultation@surreyheath.gov.uk

Chris Colloff
Email:
Mobile:

Thames Water Ltd
1st Floor West
Clearwater Court
Vastern Road
Reading
RG1 8DB

thameswater.co.uk

Our Ref:

19 September 2024

Surrey Heath Local Plan Regulation 19 Consultation

Dear Sir/Madam,

Thank you for consulting Thames Water on the above document. Thames Water are the sewerage undertaker for the Borough with three sewage treatment works serving the area located in Camberley, Chobham and Lightwater.

We have attached completed comments forms in relation to Policy IN1 to help ensure that planning conditions can be used to phase development to align with infrastructure provision and Policy EN6 to promote a drainage hierarchy. It should be noted that the time to deliver network upgrades can be from 18 months to 3 years from the point at which there is certainty that development will come forward. As such we would welcome the support of the council in encouraging developers to engage with Thames Water ahead of the submission of any applications to discuss their proposals and timescales for delivery.

In relation to the proposed housing allocations we have undertaken a high level review of the proposals and have attached comments on the potential sewerage infrastructure issues. It should be noted that the impacts will be dependent on a number of variables and as such developers should again be encouraged to engage with Thames Water at an early stage.

I trust the above comments will be given due consideration. Should you have any queries regarding the comments please do not hesitate to contact me.

Kind regards,

Chris Colloff MRTPI Planner

Site Name	Net Gain to System (I/day)	Net Foul Water Increase to System (I/s)	Net Property Equivalent Increase - Waste	Waste Response	Additional Comments
907 - Sir William Siemens Square, 10 Chobham Road, Frimley, Camberley, Surrey	181764	2.1	170	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

HA1/01 - Bagshot Depot and Archaeology Centre, London Road, Bagshot GU19 5HN	53460	0.62	50	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open
HA1/02 - Camberley Centre, France Hill Drive, Camberley, GU15 3QG	37422	0.43	35	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	water features for gradual release > Discharge rainwater direct to a watercourse These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

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HA1/03 - Camberley Station, Station House, Pembroke Broadway, Camberley	160380	1.86	150	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/04 - York Town Car Park, Sullivan Road, Camberley	28868.4	0.33	27	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/06 - Chobham Rugby Club, Windsor Road, Chobham	97297.2	1.13	91	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in

				writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.
HA1/07 - St James House, Knoll Road, Camberley	32076	0.37	30	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/08 - Land off Spencer Close, Frimley Green	64152	0.74	60	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

HA1/09 - Former Portesbery School, Portesbery Road, Camberley	38491.2	0.45	36	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/10 - Land rear of 192-210 London Road, Bagshot,	21384	0.25	20	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.

HA1/11 - The Deans,	21384	0.25	20	On the information available to date we do not envisage	These comments are based
Bridge Road, Bagshot				infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater
					direct to a watercourse.
HA1/12 - 317 to 319 Guildford Road, Bisley	18176.4	0.21	17	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.

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HA1/13 - 280 Gordon Avenue, Camberley,	16038	0.19	15	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/14 - Burwood House Hotel, 15 London Road, Camberley,	10692	0.12	10	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/15 - 439 - 445 London Road, Camberley,	16038	0.19	15	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

				writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
HA1/16 - Land Rear of 1 - 47 Sullivan Road, Camberley	14968.8	0.17	14	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
				writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
HA1/17 - Broadford, Castle Grove Road, Chobham	16038	0.19	15	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open

					release > Discharge rainwater direct to a watercourse.
HA1/18 - Land North of Guildford Road, Deepcut,	22453.2	0.26	21	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/19 - Former Premier Site, Newfoundland Road, Deepcut,	13899.6	0.16	13	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

HA1/20 - The Grange, St Catherines Road	18176.4	0.21	17	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/21 - 103 - 109 Guildford Road, Lightwater	22453.2	0.26	21	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.

HA1/22 - Land adjacent to Sherrard Way	17107.2	0.2	16	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/23 - St Margarets Cottage and The Ferns, Woodlands Lane, Windlesham	17107.2	0.2	16	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.

HA1/24 - Land East of Benner Lane, West End	17107.2	0.2	16	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface
				developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW,	water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in
				Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.
HA1/25 - Land at Chamness, Woodlands Lane, Windlesham	21384	0.25	20	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped). Surface water should follow the surface water disposal hierarchy: Store Rainwater for later use > Use infiltration techniques, such as porous surfaces in non-clay areas > Attenuate rainwater in ponds or open water features for gradual release > Discharge rainwater direct to a watercourse.

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HA1/26 - Pinehurst, 141 Park Road, Camberley HA1/26 - Pinehurst, 141 Park Road, Camberley	34214.4	0.4	32	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/27 - Land at Loen, St Catherines Road, Deepcut	64152	0.74	60	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email or in writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.
HA1/28 - 61 - 63 London Road, Camberley	34214.4	0.4	32	On the information available to date we do not envisage infrastructure concerns regarding wastewater networks in relation to this development/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. Please contact Thames Water Development Planning, either by email	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

				writing Thames Water Utilities Ltd, Maple Lodge STW, Denham Way, Rickmansworth, Hertfordshire, WD3 9SQ	
HA2: London Road Block, Camberley Town Centre	588060	6.81	550	The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development/s. Failure to liaise with Thames Water will increase the risk of planning conditions being sought at the application stage to control the phasing of development in order to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of development. The developer can request information on network infrastructure by visiting the Thames Water website https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development.	These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.

HA3: Land East of	363528	4.21	340	The scale of development/s is likely to require upgrades to	These comments are based
Knoll Road,				the wastewater network. It is recommended that the	on foul flows connecting to
Camberley Town				Developer and the Local Planning Authority liaise with	the public sewer by gravity
Centre				Thames Water at the earliest opportunity to agree a	(not pumped) and no surface
				housing and infrastructure phasing plan. The plan should	water flows being discharged
				determine the magnitude of spare capacity currently	to the public sewer.
				available within the network and what phasing may be	
				required to ensure development does not outpace delivery	
				of essential network upgrades to accommodate future	
				development/s. Failure to liaise with Thames Water will	
				increase the risk of planning conditions being sought at the	
				application stage to control the phasing of development in	
				order to ensure that any necessary infrastructure upgrades	
				are delivered ahead of the occupation of development. The	
				developer can request information on network	
				infrastructure by visiting the Thames Water website	
				https://developers.thameswater.co.uk/Developing-a-large-	
				site/Planning-your-development.	



Surrey Heath Borough Council

Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)

Representation Form

Ref:

(For official use only)

Please return to: planning.consultation@surreyheath.gov.uk

OR

Planning Policy and Conservation, Surrey Heath Borough Council, Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:

Part A - Personal Details

Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)

Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is here.

Please read the separate guidance notes before completing this form.

Part A

1. Personal Details*			2. Agent's Details (if applicable)			
* If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.						
Title	Mr					
First Name	Chris					
Last Name	Colloff					
Job Title (where relevant)	Planner					
Organisation (where relevant)	Thames Water Utilities Limited					
Address Line 1	Clearwater Court					
Line 2	Vastern Road					
Line 3	Berkshire					
Post Code	RG1 8DB					
Telephone Number						
E-mail Address						

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

- The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?
- The independent examiner's recommendations are published?
- The Local Plan has been adopted?

Yes	No
√	
√	
✓	

Please note that your formal comments (known as <u>representations</u>) and your <u>name</u> will be made available on the Council's website. All other details in Part A of this form containing your personal details will <u>not</u> be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

3. To which part of the Pre-Submission Local Plan does this representation relate?
Paragraph 5.7 Policy IN1 Other, e.g. policies map, table, appendix
4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)
4.(1) Legally compliant (please refer to guidance notes) No
4.(2) Sound (please refer to guidance notes) Yes No X
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes) Yes No
5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.
We support the aims of the policy in relation to wastewater infrastructure, however, network improvements cannot be secured through S106 agreements or through CIL. While reference is made in Policy IN1(b) to infrastructure phasing it is not clear that planning conditions can be used to agree infrastructure phasing plans to ensure that development is not occupied ahead of the completion of any sewerage network reinforcement works. As such the policy could be ineffective and would not be sound. (Continue on a separate sheet / expand box if necessary

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination) You will need to say why each modification will make the Pre-Submission Local 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. Please be as precise as possible.
To provide clarity that planning conditions can be used to secure phasing of development to align with infrastructure delivery and make sure the policy is effective in aligning infrastructure delivery and therefore that it is sound it is recommended that the supporting text in paragraph 5.7 is amended as follows:
"There are a number of mechanisms by which the Council can seek the provision or funding of infrastructure, or ensure the alignment of infrastructure delivery, alongside new development. Provision will be secured through planning conditions; planning obligations (S106); and/or the Community Infrastructure Levy (or its replacement) as appropriate. Such contributions may be pooled, in order to allow necessary infrastructure to be secured in a fair and equitable way insofar as is compliant with relevant legislation."
(Continue on a separate sheet / expand box if necessary)
Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions. After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.
7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?
necessary to participate at the oral part of the examination? No, I do not wish to participate at the Yes, I wish to participate at the
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate. 8. If you wish to participate at the oral part of the examination, please outline why you consider this to be
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate. 8. If you wish to participate at the oral part of the examination, please outline why you consider this to be
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate. 8. If you wish to participate at the oral part of the examination, please outline why you consider this to be
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate. 8. If you wish to participate at the oral part of the examination, please outline why you consider this to be
necessary to participate at the oral part of the examination? X No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate. 8. If you wish to participate at the oral part of the examination, please outline why you consider this to be

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



Surrey Heath Borough Council

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Planning Policy and Conservation, Surrey Heath Borough Council, Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

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Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is here.

Please read the separate guidance notes before completing this form.

Part A

Personal Details* *If an agent is appointed, ple	ease complete only the Title, Name and Organisation	2. Agent's Details (if applicable)
boxes below but complete th	ne full contact details of the agent in 2.	
Title	Mr	
First Name	Chris	
Last Name	Colloff	
Job Title (where relevant)	Planner	
Organisation (where relevant)	Thames Water Utilities Limited	
Address Line 1	Clearwater Court	
Line 2	Vastern Road	
Line 3	Berkshire	
Post Code	RG1 8DB	
Telephone Number		
F-mail Address		

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

- The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?
- The independent examiner's recommendations are published?
- The Local Plan has been adopted?

Yes	No
√	
√	
✓	

Please note that your formal comments (known as <u>representations</u>) and your <u>name</u> will be made available on the Council's website. All other details in Part A of this form containing your personal details will <u>not</u> be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :	Thames Water Utilities L	ımıted				
3. To which part of the Pre-S	ubmission Local Plan doe	s this represe	entation relate?			
Paragraph	Policy	EN6	Other, e.g. po map, t appe			
4. Do you consider the Pre-S	ubmission Local Plan is?	(place an X ir	n the box to indica	ate which applies)		
4.(1) Legally compliant (p guidance notes)	lease refer to	Yes			No	<u>-</u>
4.(2) Sound (please refer to g	guidance notes)	Yes			No	Х
4.(3) Complies with the Duty Co-operate (please refe notes)		Yes			No	
Please give details of why soundness or fails to comply If you wish to support the leg operate, please also use this information on legal compliar	with the duty to co-operat al compliance or soundne box to set out your commo	te. Please be ess of the Pre-	as precise as pos -Submission Loca	ssible. al Plan or its compliance wi	th the	duty to co-
We support the aims of the p In relation to part 4 (a) and (c ensuring the delivery of SuDS Changes are therefore sugge policy sound.	 e) of the policy it is conside S following a drainage hie 	ered that the prarchy and to	oolicy could be st minimise the dis	rengthened to make it more charge rates in line with De	fra gu	ıidance.
			(C	ontinue on a separate sheet / expa	and bo	x if necessary)

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and

(Please note that non-compliance with the duty to co-operate is incapable of modification at examination)

sound, having regard to the matters you have identified at 5 above.

You will need to say why each modification will make the Pre-Submission Local 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. Please be as precise as possible.

In order to ensure the policy is sound it is considered that part 4 (a) should be amended to reference the drainage hierarchy by stating:

- "a) ensure that surface water containment with any associated flood risk is managed as close to source as possible and does not increase flood risk elsewhere in line with the following hierarchy:
 - 1) Storing rainwater for later re-use;
 - 2) Use infiltration techniques;
 - 3) Attenuate rainwater in ponds for later gradual release;
 - 4) Attenuate rainwater by storage for later gradual release:
 - 5) Discharge rainwater directly to a watercourse;
 - 6) Discharge rainwater to a surface water/sewer.

Part 4(c) of the policy should also be revised as follows:

"where appropriate, discharge of surface water to watercourse or sewer system is not to exceed pre-development (greenfield) runoff rates or a maximum of 2/l/s/ha whichever is lower. Connection to a piped watercourse or public sewer will only be accepted where all alternatives have been justifiably discounted"

It is considered that this requirement should be incorporated into the wording of the policy and that the policy should require that the discharge rate does not exceed 2/l/s/ha as set out in DEFRA guidance (see:

https://assets.publishing.service.gov.uk/media/602e7158d3bf7f7220fe109d/_Rainfall_Runoff_Management_for_Developments_-_Revision_E.pdf). This would assist with minimising flows of rainwater into the combined sewer network.

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

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

Χ

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

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

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

Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they
wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.