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| |  |  | | --- | --- | | Cherwell District Council Planning & Development Services Bodicote House Bodicote, Banbury Oxon OX15 4AA  25 January 2018 | Our DTS Ref: 56929 Your Ref: 17/02534/OUT | |
| Dear Sir/Madam  **Re: 66, PINGLE DRIVE, BICESTER, OXFORDSHIRE, OX26 6WD**  **Waste Comments** Thames Water would advise that with regard to sewerage infrastructure capacity, we would not have any objection to the above planning application.  Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of groundwater. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. The contact number is 0800 009 3921. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.   A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.  We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water’s Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.   **Water Comments** The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.  Thames Water recommends the following informative be attached to any planning permission: There is a Thames Water main crossing the development site which may/will need to be diverted at the Developers cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.  No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.    **Supplementary Comments** Thames Waters consultation response reflects our concern that the applicant has failed to demonstrate that future occupiers of the proposed development will have adequate amenity. Given the proposed development’s close proximity to the Sewage Asset we object to the planning application.   Background - The amenity of those that will occupy new development must be a consideration in deciding whether or not to grant permission for new developments. This is underlined in the 2012 National Planning Policy Framework (paragraph 120) which states that: To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.  Amenity - The applicant must therefore include an assessment of potential impacts on amenity for future occupiers of the proposed development. This should include an appraisal of existing odour, noise and lighting from the Sewage Asset and its potential impact on future occupiers of the proposed development. The local planning authority must ensure they are satisfied with the applicant’s assessment in that the amenity of future occupiers of the proposed development will be acceptable. If amenity is considered acceptable by the local planning authority then we would request that any proposed mitigation that is set out in the assessment is controlled via a planning condition.  **Odour**  Thames Water’s consultation response reflects our concern that the applicant has failed to demonstrate that future occupiers of the proposed development will have adequate amenity. Given the proposed development’s close proximity to the Sewage Asset we object to the planning application.  *Background* - The amenity of those that will occupy new development must be a consideration in deciding whether or not to grant permission for new developments. This is underlined in the 2012 National Planning Policy Framework (paragraph 120) which states that: ‘To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.  *Amenity* - The applicant must therefore include an assessment of potential impacts on amenity for future occupiers of the proposed development. This should include an appraisal of existing odour, noise and lighting from the Sewage Asset and its potential impact on future occupiers of the proposed development. The local planning authority must ensure they are satisfied with the applicant’s assessment in that the amenity of future occupiers of the proposed development will be acceptable. If amenity is considered acceptable by the local planning authority then we would request that any proposed mitigation that is set out in the assessment is controlled via a planning condition.  *Odour* - Odour can be a particular issue at our sewage assets. It is important to ensure that development which might be sensitive to the odour environment in the vicinity of existing assets is not permitted to take place unless: (a) it can be established that it will be located or designed in such a manner as not actually to be sensitive to such odour; (b) or that funding is made available by the applicant for the installation of odour treatment apparatus sufficient to overcome any conflict between the development and uses proposed. To address odour as an environmental impact, the applicant should submit an odour assessment to demonstrate that there will be no adverse impact in relation to odour. The odour assessment should be based on assessing onsite odour emissions. The assessment should also include an outline of an odour mitigation measures strategy. If the odour assessment is considered acceptable by the local planning authority and Thames Water, then we would request that any proposed mitigation that is set out in the odour assessment is controlled via a planning condition. A suggested planning condition is set out below.  “No development shall commence until an odour modelling assessment has been submitted to and approved by the local planning authority in consultation with Thames Water. The odour assessment should be based on assessing on site odour emissions. The assessment should include an odour mitigation measures strategy.  There should be no occupation of the development until the recommendations of the odour mitigation strategy are agreed by the local planning authority in consultation with Thames Water and have been implemented and are operational.”  *Conclusion* - We will maintain our objection until the amenity of potential future occupiers of the proposed development is adequate addressed by the applicant. To address our objection the applicant should submit an appropriate appraisal of amenity which conclusions and recommendations satisfy the local planning authority. The applicant should within its submission include a detailed odour assessment, which should be prepared in consultation with Thames Water. Finally, should the Local Planning Authority consider the above is inappropriate, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the Planning Application approval.  Thames Water position is based on tables within the institute of air quality management document ‘Guidance on the assessment of Odour for planning’.  Link to document >>>> <http://www.iaqm.co.uk/text/guidance/odour-guidance-2014.pdf>  Tables copied below for ease.   * **Commercial use would be a medium sensitivity receptor.** * **Odour impact based on the OIA would be moderate for this type of receptor.** * **For planning application perspective this is a moderate adverse impact, but a significant one**   As such we would recommend that a development of this type should not be located within the 3 isopleth odour contour  cid:image004.png@01D3950A.4264A4E0  cid:image001.png@01D39508.E082ECB0  cid:image003.png@01D39509.0D67D830    **John Georgoulias**  Developer Services – Development Planning Team Leader  020 3577 9998  [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)  Maple Lodge Sewage Treatment Works, Denham Way, Rickmansworth, WD3 9SQ  thameslogoemail image4144 | |
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