Question 48

In the light of the representation (455) from Savills Reading on behalf of Thames Water Utilities and from Anglian Water services Ltd (1046), I would welcome the Council’s comments on the deliverability of the site allocations AGT -1, 2, 3 and 4, AYL 032, 052, 059, 063 and 115, BUC 043, 046 and 051, SCD 0003 and 8 and MMO 006.

AVDC’s Response

Having worked closely with Thames Water and Anglian Water in association with Buckinghamshire County Council and the Environment Agency on the preparation of supporting evidence and the content of the submitted plan, AVDC is confident that the site allocations in the VALP are deliverable having considered the issues raised by Anglian and Thames Water, but accepts that minor wording alterations to some policies may be needed to address some remaining concerns.

AVDC notes the Thames Water reference in their representations to the completed Water Cycle Study: Phase 1 (2017) (CD/WCF/001m). The study assessed all the site options from the 2017 HELAA study for water cycle infrastructure implications for the relevant sites. Only a small number of the HELAA sites were ultimately allocated in the VALP Proposed Submission. The Water Cycle study looked at the impact of housing growth on Water Resources and Supply, Water Quality, Wastewater Treatment and Sewerage System Capacity and Climate Change.

The study fully involved both Thames Water and Anglian Water on the Steering Group. The study involved several steering group meetings with the companies attended concerning the methodology proposed for the study and also draft findings of a main report which the companies had the opportunity to make inputs. All comments received were responded to and changes were made before the final report was signed off for publication.

AVDC has fully considered the conclusions of the Water Cycle Study regarding specific sites and the infrastructure upgrades required. To address these issues, the following actions have been taken or will be taken:

- **VALP Policy I5 on Water Resources** – this policy covers water cycle infrastructure and the need for planning applications to consult the relevant water company to identify the level of current capacity, take into account the capacity available, the need for development phasing and the need for planning obligations to secure contributions to capacity improvements required as a result of development.

- **VALP Site Allocation Policy Criteria** – where capacity improvements are known from the Water Cycle Study these have been added to the site criteria.

- **Infrastructure Delivery Plan (CD/INF/001 and 001a)** – Section 7 on Utilities. The IDP is a living document and the intention is to update the Appendices for Section 7 once further details are known for water cycle infrastructure, for instance through the progress of planning applications for the allocated sites.

- **VALP Site Delivery Statements** for relevant sites will provide a statement on the deliverability of specific sites, working with the site promoter on behalf of the landowner. These SDSs can concern water cycle study issues if there are water
cycle infrastructure upgrades needed. These may be existing infrastructure deficiencies or deficiencies taking account of the VALP growth. The Water Cycle Study identifies current known infrastructure deficiencies. The developer is required to work with the water company to identify the capacity upgrades needed and whether or not developer contributions are needed to help deliver the upgrade.

In terms of Anglian Water’s comments regarding suggested changes to site criteria on sites BUC043, BUC51, BUC046, SCD003, SCD008 and MMO006 concerning water cycle and sustainable drainage matters, AVDC does not object to those changes being made. Anglian Water have also made suggestions to change Policies I4 and I5 and AVDC is also happy for those changes to be incorporated. However, the council will need to confirm that these changes are appropriate with Buckingham County Council and the Environment Agency before modifications are proposed. Their input has been requested by the council.

It is further considered, however, regarding appropriate site allocations that it would be appropriate for Thames Water to consider whether similar changes to those proposed by Anglian Water should be made on the allocation policies for sites within their area to be consistent in approach across the local plan area. Both Buckinghamshire County Council and the Environment Agency should also be asked to comment on whether they are happy with the suggested changes to site allocation policies as key stakeholders. Thames Water will also be asked to comment on the Anglian Water suggestions for policies I4 and I5 to ensure the changes raise no issues for them.

AVDC notes that Thames Water has indicated that it will not be in a position to approve the Council’s suggested approach set out in this answer until June. AVDC therefore provides this interim answer to question 48 and proposes to submit an updated answer in June once Thames Water has clarified its position.

AVDC has shared (on 29 May 2017) this response with Anglian Water for their comments. It is unclear when Anglian Water will be able to respond to this therefore AVDC therefore provides this interim answer to question 48 and proposes to submit an updated answer once Anglian Water has clarified its position.