



Representation Form

Loxwood Neighbourhood Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Loxwood Neighbourhood Plan Steering Group has prepared a Neighbourhood Plan. The plan sets out a vision for the future of the parish and planning policies which will be used to determine planning applications locally.

Copies of the Loxwood Neighbourhood Plan and supporting documents are available to view on the District Council's website: <http://www.chichester.gov.uk/neighbourhoodplan>.

All comments must be received by 5:00pm on 4th December 2014.

There are a number of ways to make your comments:

- Complete this form on your computer and email it to: neighbourhoodplanning@chichester.gov.uk
- Print this form and post it to us at: **Neighbourhood Planning, East Pallant House, 1 East Pallant, Chichester PO19 1TY**

All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Chichester District Council in line with the Data Protection Act 1998.

How to use this form

Please complete Part A in full, in order for your representation to be taken into account at the Neighbourhood Plan examination.

Please complete Part B overleaf, identifying which paragraph your comment relates to by completing the appropriate box.

PART A	Your Details
Full Name	Clare Gibbons
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Organisation (if applicable)	Southern Water
Position (if applicable)	Development Manager
Date	November 2014

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	New policy
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support Support with modifications Oppose Have Comments

Please give details of your reasons for support/opposition, or make other comments here:

Previous representation

We reiterate the comments that we made to the pre-submission version of the Neighbourhood Plan and seek policy provision to support new infrastructure. This would ensure that the Loxwood Neighbourhood Development Plan (NDP) would be in line with the National Planning Policy Framework (NPPF).

This is because new and improved water and wastewater infrastructure will be required to serve new development or to meet stricter quality standards. Delivery of infrastructure improvements needs to be supported by development plan policies, planning consents and in the case of wastewater treatment, environmental permits from the Environment Agency.

Our proposed policy provision would accord with one of the Core Planning Principles identified by the NPPF to '*proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs*'. The NPPF outlines the importance of achieving sustainable development and paragraph 177 states that '*It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion...For this reason, infrastructure and development policies should be planned at the same time...*'. Also the National Policy Statement for Waste Water outlines in paragraph 2.2.5 that one of the government's key policy objectives is '*to seek wastewater infrastructure that allows us to live within environmental limits and helps ensure a strong, healthy and just society*'.

Although the Parish Council is not the planning authority in relation to water supply and wastewater development proposals, support for essential infrastructure is required at all levels of the planning system.

Therefore, we seek the following additional policy provision:

New and improved utility infrastructure will be encouraged in order to meet the identified needs of the community.

Update

The examiner in relation to the previous version of the Loxwood NDP commented the provision of new infrastructure is covered by saved Local Plan Policy BE11 and it is not necessary to replicate a similar policy in the NDP. Policy 9 of the Chichester District Local Plan: Key Policies 2014-2019 also seeks to ensure that the infrastructure needed to support development is provided but we seek similar recognition in the NDP, as it may come into force in advance of the Local Plan. Such policy provision would be in line with government guidance, including paragraph 184 of the NPPF which states that '*To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to*

support them’.

Although there are no current plans, over the life of the NDP it maybe that we need to provide new or improved infrastructure. Page 8 of the National Policy Statement on Wastewater states that *‘Waste water treatment is essential for public health and a clean environment. Demand for **new and improved** waste water infrastructure is likely to increase in response to the following main drivers: **More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change.** The Government is taking measures to reduce the demand for new waste water infrastructure in England....However, there will still be a need for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems are able to function effectively together to deliver a wide range of ecosystem services and other benefits to society’.*

Our proposed policy provision would enable two of the basic conditions necessary for a NDP to be met, namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State and to contribute to the achievement of sustainable development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

To ensure consistency with government guidance and facilitate sustainable development, we propose the following additional policy in the NDP:

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community, subject to other policies in the development plan.

(Continue on separate sheet if necessary)

If you have additional representations feel free to include additional pages. Please make sure any additional pages are clearly labelled/ addressed or attached.