

Liz Pulley

From: Policy, Planning <Planning.Policy@southernwater.co.uk>
Sent: 11 February 2015 15:19
To: Neighbourhood Planning
Subject: RE: Publication of the Birdham Parish Neighbourhood Plan -Southern Water's response
Attachments: 150211 BirdhamSubmissionNDP New policy.doc; 150211 BirdhamSubmissionNDP Policy 3.doc

Dear Ms. Dobson,

Thank you for your email below. Please find attached Southern Water's response. We would be grateful if you could keep us informed of the progress that is made.

Regards,

Clare

Clare Gibbons
Development Manager
Regional Planning
Infrastructure

01273 663143 (direct)
www.southernwater.co.uk

Southern Water, Southern House, Lewes Road, Brighton, BN1 9PY

From: Valerie Dobson [mailto:vdobson@chichester.gov.uk]
Sent: 11 December 2014 08:19
Subject: Publication of the Birdham Parish Neighbourhood Plan

Publication of the Birdham Parish Neighbourhood Plan

The Neighbourhood Planning (General) Regulations 2012 (Regulation 16)

Birdham Parish Council as the qualifying body has prepared a neighbourhood development plan, entitled Birdham Parish Neighbourhood Plan, for their parish with the help of the local community. 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 Birdham Parish Neighbourhood Plan and supporting documentation are available to view on the District Council's website <http://www.chichester.gov.uk/neighbourhoodplan>

Hard copies are available for inspection at:

Chichester District Council

East Pallant House,
1 East Pallant
Chichester
PO19 1TY

(08:45 – 17:10 Mon – Thurs/ 08:45 – 17:00 Fri) *(NB Please note that the Council will be closed for the Christmas period from 4pm on Wednesday 24th December 2014 until 8.45am on Friday 2nd January 2015).*

By contacting the Clerk, Birdham Parish Council:

28 Langdale Avenue,
Chichester PO19 8JQ
(clerk@birdhamparishcouncil.org.uk 01243 790402)

The period for submission of representations will run for six weeks from Thursday 11th December 2014 until Thursday 12th February 2014. Representations should arrive no later than 5.00pm on 12th February 2014. All representations received will be available to view publicly.

To make representations:

Printed response forms are available from the locations listed above or can be downloaded and filled in electronically by visiting <http://www.chichester.gov.uk/neighbourhoodplan>

Completed response forms should be sent to:

- Neighbourhood Planning, Chichester District Council, East Pallant House, 1 East Pallant, Chichester PO19 1TY
- Or emailed to neighbourhoodplanning@chichester.gov.uk

Please note that any representations may include a request to be notified of the local planning authority's decision under regulation 19 in relation to the neighbourhood development plan.

Valerie Dobson

Neighbourhood Planning Officer

Chichester District Council

Tel: 01243 534594 | Fax: | vdobson@chichester.gov.uk |
www.facebook.com/ChichesterDistrictCouncil | www.twitter.com/ChichesterDC

Please note that the Council will be closed for the Christmas period from 4pm on Wednesday 24th December 2014 until 8.45am on Friday 2nd January 2015.

Chichester District Council would like to wish everyone a Happy Christmas and a prosperous New Year
<http://www.chichester.gov.uk/christmas>

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Representation Form

Birdham Neighbourhood Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Birdham Parish Council 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 Birdham 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 Thursday 12 February 2015.

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
Address	Southern Water Southern House Lewes Road Falmer Brighton
Postcode	BN1 9PY
Telephone	
Email	Planningpolicy@southernwater.co.uk
Organisation (if applicable)	Southern Water
Position (if applicable)	Development Manager
Date	11 th February 2015

PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	New policy provision sought.
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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:

We can find no policies to support the delivery of new or improved infrastructure, which is required to serve new development identified in the Neighbourhood Development Plan (NDP). Without this policy provision, the NDP does not meet the basic conditions necessary for a NDP, namely to have regard to national policies and contribute to the achievement of sustainable development.

National policies and guidance

Southern Water is the statutory sewerage undertaker for Birdham. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, parish councils and the planning authority. The adopted Birdham NDP and adopted Chichester Local Plan will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry's economic regulator. Investment proposals are prepared every five years through the price review process. The last price review was last year. Ofwat's price determination funds the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.

Over the life of the NDP it could be that we need to provide new or improved infrastructure that requires planning permission. 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 approached 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'*

Accordingly, we seek policy provision to support new or improved utility infrastructure should this be required. Such policy provision would also be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to *'proactively drive and support economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'*. Also paragraph 157 of the NPPF requires positive planning for development and infrastructure required in an area.

Proposed amendment

The assessment contained in the Basic Conditions Statement (accompanying the submission version of the Birdham NDP) does not recognise paragraphs 17 and 157 of the NPPF as outlined above. Our proposed policy provision supporting the delivery of utility infrastructure would

address these omission and enable 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 contribute to the achievement of sustainable development.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

Accordingly in line with government policy and guidance, we propose the following additional policy:

New or improved utility infrastructure will be supported, where the benefit outweighs any harm, or it can be demonstrated there are no reasonable alternative sites available.

(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.

