

Liz Pulley


From: Policy, Planning <Planning.Policy@southernwater.co.uk>
Sent: 08 June 2015 15:27
To: Neighbourhood Planning
Subject: RE: Publication of the Tangmere Parish Neighbourhood Plan- Southern Water's response
Attachments: 150608 TangmereNDPSubmisisonPolicy2.doc; 150608 TangmereNDPSubmisisonPolicy7.doc; 150608 TangmereNDPSubmisisonNewPolicy.doc

Dear Sir/Madam,

Thank you for consulting us on the submission version of the Tangmere NDP. Please find attached Southern Water's response. We would be grateful if you could keep us informed of any progress that is made.

Regards,

Clare Gibbons
Development Manager

 Southern Water | T. 01273 663143
www.southernwater.co.uk

From: Sue Payne [mailto:spayne@chichester.gov.uk] **On Behalf Of** Neighbourhood Planning
Sent: 30 April 2015 11:03
Subject: Publication of the Tangmere Parish Neighbourhood Plan

Publication of the Tangmere Parish Neighbourhood Plan

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

Tangmere Parish Council as the qualifying body has prepared a neighbourhood development plan, entitled Tangmere 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 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).

The period for submission of representations will run for six weeks from **Thursday 30th April until Thursday 11th June 2015**. Representations should arrive no later than **5.00pm on 11th June 2015**. 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.

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Representation Form

Tangmere Neighbourhood Plan

The Neighbourhood Planning (General) Regulations
2012 - Regulation 16

Tangmere 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 Tangmere 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 11th June 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 Brighton
Postcode	BN1 9PY
Telephone	
Email	Planning.policy@southernwater.co.uk
Organisation (if applicable)	Southern Water
Position (if applicable)	Development Manager

Date	8th June 2015
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PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	Policy 2: Strategic Housing Development
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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:

Policy 2 sets out the development principles for the 'Tangmere Strategic Development Location'. As indicated in our previous representations to the Tangmere Neighbourhood Development Plan (NDP), additional wastewater treatment capacity and local sewerage infrastructure would be required to serve this strategic development, which includes 1,000 homes. This is recognised in policy 18 of the emerging Chichester Local Plan. However, it is considered that as the provision of this essential infrastructure is fundamental to the delivery of the strategic development site, it should be included in the NDP. This approach is in line with paragraph 184 of the **National Planning Policy Framework (NPPF)** that states '*....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*' (underlining is our emphasis).

Without the requisite policy provision, the Tangmere NDP does not meet the basic conditions necessary for a NDP, namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State, to be in general conformity with the strategic policies contained in the development plan for the area of the authority and contribute to the achievement of sustainable development.

National policies and guidance

Specific policy provision to facilitate the delivery of local infrastructure and phasing of development in line with additional capacity at the wastewater treatment works, would be in line with government policy and guidance, including:

- paragraph 7 of the NPPF identifies that the economic role of sustainable development is to ensure '*sufficient land of the right type is available in the right places and at the right time to support growth and innovation; **and by identifying and coordinating development requirements, including the provision of infrastructure***' (highlighting is our emphasis).
- paragraph 21 of the NPPF states that '*Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or lack of infrastructure, services or housing*'.
- paragraph 183 of the NPPF requires NDPs to set planning policies to determine decisions on planning applications,
- the **National Planning Practice Guidance (NPPG)** advises in paragraph 41 that '*A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique*

characteristics and planning context of the specific neighbourhood area for which it has been prepared'.

- paragraph 45 of the NPPG also directs that *'infrastructure is needed to support development and ensure that a neighbourhood can grow in a sustainable way. The following may be important considerations for a qualifying body to consider when addressing infrastructure in a neighbourhood plan: * what additional infrastructure may be needed to enable development proposed in a neighbourhood plan to be delivered in a sustainable way...'*

If development is permitted to proceed where there is inadequate capacity in the sewerage network or at the wastewater treatment works, it could lead to flooding and pollution of the environment. This situation would be contrary to paragraph 109 of the NPPF, which requires the planning system to prevent both new and existing development from contributing to pollution.

Strategic policies

Policy 9 of the latest version of the Chichester Local Plan states that *'Development and infrastructure provision will be coordinated to ensure that growth is supported by the timely provision of adequate infrastructure, facilities and services.....All development will be required to meet **all the following criteria:**2. Provide or fund new infrastructure, facilities or services required, both on- and off- site as a consequence of the proposal'*. Paragraphs 15 and 16 of the 'Position Statement on Wastewater and Delivering Development in the Local Plan' set out that the majority of headroom at Tangmere Wastewater Treatment Works is taken up until the works are upgraded. Our proposed policy provision would ensure that a sustainable development is achieved in general conformity with the area's strategic planning policies.

There is a risk that: (i) the necessary local sewerage infrastructure (i.e. the network of underground sewer pipes and associated facilities such as pumping stations) will not be delivered in time to serve the proposed development and (ii) it could proceed before there is sufficient capacity at Tangmere wastewater treatment works, unless the delivery of local infrastructure and the phasing of development is supported by planning policies and subsequently in planning conditions.

The 'Basic Conditions Statement' submitted in support of the Tangmere NDP does not identify paragraphs 17, 109 or 162 of the NPPF or demonstrate how it is in general conformity with policy 9 of the emerging Chichester Local Plan.

(Continue on separate sheet if necessary)

What improvements or modifications would you suggest?

To ensure consistency with the strategic policies of Chichester District Council, the NPPF and National Planning Practice Guidance, we reiterate the following criteria should be included in policy 2 of the Tangmere NDP:

Development proposals for housing and other uses on land designated.....provided they accord with the following principles:

xi. Development will be dependent on the provision of infrastructure for adequate wastewater conveyance and treatment to meet strict environmental standards.

(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.

