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| CDC b&w LOW res | **Representation Form**  **Plaistow and Ifold Parish Neighbourhood Plan**  **The Neighbourhood Planning (General) Regulations 2012 - Regulation 16** |

Plaistow and Ifold 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 Plaistow and Ifold Parish Neighbourhood Plan and supporting documents are available to view on Chichester District Council’s website:

<http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00 pm on 30 April 2020.**

## There are a number of ways to make your comments:

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

## Use of your personal data

All comments in Part B below will be publicly available and identifiable by name and (where applicable) organisation. Please note that any other personal information included in Part A below will be processed by Chichester District Council in line with the principles and rights set out in the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018, which cover such things as why and for how long we use, keep and look after your personal data.

**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 to which paragraph your comment relates by completing the appropriate box.

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| **PART A** | **Your Details** |
| **Full Name** | Charlotte Mayall |
| **Address** | Southern Water, Southern House, Lewes Road Brighton |
| **Postcode** | BN1 9PY |

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| **Telephone** | 01273 663742 |
| **Email** | [Planning.policy@southernwater.co.uk](mailto:Planning.policy@southernwater.co.uk) |
| **Organisation (if applicable)** | Southern Water |
| **Position (if applicable)** | Regional Planning Lead |
| **Date** | 28 April 2020 |

# PART B

## To which part of the document does your representation relate?

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number | 5.13 | Policy Reference: | Ci 1 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer) Support Support with modifications Oppose Have Comments 

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Southern Water provides potable water supply and wastewater drainage services to the Parish of Plaistow & Ifold. Paragraph 5.13 of the Neighbourhood Plan states that Loxwood Wastewater Treatment Works (WTW) ‘*is currently at over-capacity’*. However Southern Water is currently operating the WTW within the parameters of the environmental permits issued by the Environment Agency, and has capacity to treat the current levels of incoming wastewater to the standards required by the Environmental Permit. Future population increases within the Loxwood catchment, including those settlements outside Plaistow & Ifold Parish, will trigger the need to implement upgrades. However this is business as usual for Southern Water and will be planned for and delivered in accordance with regulatory requirements.  (Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| In order to ensure the content of the Neighbourhood Plan is accurate, we would suggest the deletion of the following text in paragraph 5.13:  *[…] Also, Loxwood Parish receives effluent from Alfold Parish in Surrey ~~and the Loxwood Waste Water~~ ~~Treatment Works (WwTW) is currently at over-capacity~~.*  (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.

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| **Postcode** | BN1 9PY |
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| **Organisation (if applicable)** | Southern Water |
| **Position (if applicable)** | Regional Planning Lead |
| **Date** | 28 April 2020 |

# PART B

## To which part of the document does your representation relate?

|  |  |  |  |
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| Paragraph Number | 5.15 | Policy Reference: | Ci 1 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer) Support Support with modifications  Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Whilst Southern Water supports the inclusion of this paragraph within the neighbourhood plan, we would highlight that since the last consultation on the Plaistow & Ifold Neighbourhood Plan was carried out in October 2017, OFWAT has introduced a new water and wastewater charging mechanism that was implemented from 1st April 2018. As a result, we have adjusted our approach in line with the new requirements, and as a result the current content of paragraph 5.15 is no longer applicable. More detailed information regarding the new charging arrangements can be found on our website; [https://www.southernwater.co.uk/developing-building/connection-](https://www.southernwater.co.uk/developing-building/connection-charging-arrangements) [charging-arrangements](https://www.southernwater.co.uk/developing-building/connection-charging-arrangements).  (Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| In order to ensure that information contained in the Plaistow & Ifold Neighbourhood Plan conforms to the most up to date approach to wastewater infrastructure provision, Southern Water recommends the following amendments to paragraph 5.15;  *Southern Water have advised that ~~Ofwat, the water industry's economic regulator, takes the view that~~ ~~local infrastructure, such as site specific sewers required to serve individual housing development~~ ~~sites, should be delivered by the development. To this end, the principle is that new development~~ ~~needs to connect to the sewerage systems at the nearest points of adequate capacity. This may~~ ~~require off-site infrastructure, if the nearest point is not located within the immediate vicinity of the site~~ should their assessment of a new development site reveal that there is limited capacity to accommodate additional foul flows at the ‘practical point of connection’ (as defined in the New Connections Services), network reinforcement would be required ahead of the occupation of development. Any such reinforcement would be provided through the New Infrastructure charge, but*  *Southern Water would need to work with developers to understand the development program and* |

*review whether the delivery of network reinforcement aligns with the occupation of development. This is not a constraint to development, provided that planning policy and planning conditions ensure that occupation of development is phased to align with the delivery of infrastructure, in order to prevent any increased risk of flooding from the foul network.*

(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.

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| **PART A** | **Your Details** |
| **Full Name** | Charlotte Mayall |
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| **Postcode** | BN1 9PY |
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| **Organisation (if applicable)** | Southern Water |
| **Position (if applicable)** | Regional Planning Lead |
| **Date** | 28 April 2020 |

# PART B

## To which part of the document does your representation relate?

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| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | AIM 4 and AIM 5 |

**Do you support, oppose, or wish to comment on this paragraph?** (Please tick one answer) Support  Support with modifications Oppose Have Comments

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| **Please give details of your reasons for support/opposition, or make other comments here:** |
| Southern Water welcomes the inclusion of both AIM 4 – Safeguarding Water Resources and AIM 5 Foul Drainage Capacity, as are consistent with Paragraph 170 (e) of the NPPF (2019) which states that policy and decision makers should seek to enhance the natural and local environment by ‘*preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution*’.  (Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| (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.