

**Representation Form**

**Hunston Neighbourhood Development Plan 2019-2037**

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

Hunston Parish Council has prepared a Neighbourhood Plan Review. 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 Hunston Neighbourhood Development Plan 2019-2037 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 9 September 2021.**

## 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 House, Lewes Road, Brighton |
| **Postcode** | BN1 9PY |
| **Telephone** |  |
| **Email** | [Planning.policy@southernwater.co.uk](mailto:Planning.policy@southernwater.co.uk) |
| **Organisation (if applicable)** | Southern Water |
| **Position (if applicable)** | Regional Planning Lead |
| **Date** | 9 September 2021 |

# PART B

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

|  |  |  |  |
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| Paragraph Number |  | Policy Reference: | 3.4.18 |

**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:** |
| We previously commented on paragraph 3.4.18 as it relates to the operation of Southern Water's wastewater assets. However, whilst we are pleased to note that our suggested additional text was incorporated, the suggested text to be removed was not deleted from the paragraph, and we feel this renders the content confusing and potentially misleading.  We also take this opportunity to provide some additional information regarding future growth and planned investment within Pagham WTW catchment. Not all of Pagham development drains to Pagham WTW catchment, as areas to the north drain to Ford WTW catchment, therefore the figure of 2,000 new homes for ‘Pagham’ in the context of wastewater treatment is also misleading, as this will be split between the two adjacent catchments, dependent on location.  Current planned investment for Pagham WTW will be designed to meet several objectives including reducing the frequency of storm overflow, introducing Nitrogen and Phosphate removal to the treatment process and catering for growth up to 2035.  As stated in our previous comments, during periods of heavy rain when a significant amount of rainwater enters the sewers causing a spike in flows entering the WTW, excess flows are diverted to storm settlement tanks. These tanks hold the stormwater, which is a mixture of rainwater and wastewater. Wastewater by definition contains not only ‘raw sewage’ ie waste from toilets, but also greywater from dish/washing machines, sinks and showers in people’s homes. Stormwater, which is a high proportion of rainwater mixed with standard volumes of wastewater, is collected in tanks to enable it to settle out, with denser material sinking to the bottom. If rainfall is prolonged and tank capacity is exceeded, excess stormwater will weir out of the top through mesh screens to further ensure larger particles are not released to the environment. When incoming flows eventually subside to an appropriate level, the contents of the storm tanks are returned to the WTW for full treatment.  These controlled releases of stormwater into the watercourse are occasionally necessary to prevent flooding. Such releases are permitted under the terms of our licence from the EA.  With regard to housing growth across the Pagham WTW catchment, funds have been allocated in Southern Water’s current Business Plan (2020-2025) for upgrades to be carried out to address the above in order to minimise future storm discharges and improve water quality whilst also catering for additional growth within the catchment.  (Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| In order to accurately reflect the above, we propose the following amendments to the wording of paragraph 3.4.18 of Hunston Neighbourhood Plan (additional text is underlined and text to be removed is ~~struck through~~):  *In February 2017 it was reported that stormwater, which is a mix of rainwater and screened wastewater ~~and raw sewage~~ is being discharged every five weeks on average. High flows caused by heavy rainfall are diverted into storm settlement tanks to prevent overloading of ~~Untreated sewage from~~ the Treatment Works in Summer Lane. If the capacity of these tanks is subsequently exceeded as a result of prolonged heavy rainfall, the excess stormwater weirs off the top through mesh screens before it is discharged into the Pagham Rife from where it flows into the Harbour. Pagham Parish Council member Cllr Phil Hailey reported that “Since 2011,Southern Water have had to inform the Environment Agency 55 times of a discharge into Pagham Rife of untreated or partially treated sewage. Southern Water have said they have no issues with the proposed houses here because they would not cause the treatment works any problems but, clearly, there are big problems already.” This is of critical import as there are plans to build 2,000 plus homes in Pagham (of which less than half would to connect to Pagham WTW catchment. Additional housing allocated in the northern part of Pagham will drain to Ford WTW catchment which is also located in Arun District) along with the 200 homes planned for Hunston. Investment has been committed in the current Southern Water Business Plan (2020- 2025) to carry out improvements at Pagham WTW that will address the above concerns.*  (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.

# PART B

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

|  |  |  |  |
| --- | --- | --- | --- |
| Paragraph Number |  | Policy Reference: | LC4 |

**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 understands the desire to protect local green spaces. However, we cannot support the current wording of the above policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering essential infrastructure required to serve existing and planned development.  Policy LC4 states that ‘*Proposals for development of this area will not be permitted unless the development enhances the sites recreational value and is agreed by the majority of residents through community consultation*’, however this does not take account of the potential requirement for essential utilities infrastructure, which currently runs under some of the local green spaces mapped.  The National Planning Policy Framework (NPPF) (2021) establishes in paragraph 103 that Local Green Space policies should be consistent with those for Green Belts, and Paragraph 147 sets the intention of ruling out inappropriate development ‘*except in very special circumstances*’. Paragraph 148 explains that special circumstances exist if the potential harm of a development proposal is clearly outweighed by other considerations, whilst Paragraph 150 identifies that '*certain other forms of development are also not inappropriate*’ in the Green Belt, including '*engineering operations*'.  Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential wastewater infrastructure required to serve new and existing customers. This is because there are limited options available with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance recognises this scenario and states that ‘i*t will be important to recognise that water and wastewater infrastructure sometimes has needs particular to the location (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered*’.  (Continue on separate sheet if necessary) |

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| **What improvements or modifications would you suggest?** |
| In order to meet the basic conditions through consistency with Paragraphs 147-150 of the NPPF and NPPG, Southern Water propose the following amendment to Local green space policy LC4 (new text *underlined*)  *Proposals for development of this area will not be permitted unless the development enhances the sites recreational value and is agreed by the majority of residents through community consultation, except in very special circumstances, for example where it is essential to meet specific necessary utility infrastructure needs and no feasible alternative site is available, to access or upgrade existing infrastructure.*  (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.