



The Parish Clerk
Amberley Parish Council
82 Hormare Crescent
Storrington
RH20 4QW

Your Ref:

Our Ref:

Date:
22 April 2016

Contact:
01273 663742

Dear Sir/Madam,

Amberley Neighbourhood Plan – pre-submission

We welcome the opportunity to comment on the Pre-Submission Amberley Neighbourhood Plan.

Southern Water is the statutory water supply and sewerage undertaker for Amberley, with a statutory duty to serve new development, and is committed to ensuring the right infrastructure in the right place at the right time in collaboration with developers and the Local Planning Authority. The 'made' Amberley Neighbourhood Plan, together with the adopted South Downs National Park Local Plan and Horsham Development Framework 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 in 2014. Ofwat's price determination funds the investment programme for the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.

Strategic infrastructure such as extensions to wastewater treatment works can be planned and funded through the price review process, and coordinated with new development. However, Ofwat takes the view that local infrastructure, such as local sewers, should be delivered by the development if this is specifically required to service individual development sites. 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.

We look to Amberley's Parish Council and the South Downs National Park and Horsham District Councils to ensure through planning policies and planning conditions that development is coordinated with the provision of infrastructure and not permitted to proceed unless it connects to the sewerage system at the nearest points of adequate capacity, as advised by the service provider. This will ensure that levels of service are maintained to both new and existing customers, and that the risk of flooding is not increased to unacceptable levels, or water pressure adversely affected.

Please find following our response in respect of specific policies. In summary, we seek policy provision to support the potential future need for the development of utility infrastructure.

We hope that you find our response useful and that it will be taken into account in the next version of your Neighbourhood Plan. We would be grateful if you could keep us informed of any future progress.

Yours faithfully,

CMayall

Charlotte Mayall
Planning Coordinator

Policy EN7 - Local Green Space

Southern Water understands Amberley Parish Council's desire to protect green space. However, we cannot support the current wording of this policy as it could create a barrier to statutory utility providers, such as Southern Water, from delivering the essential infrastructure required to serve existing and planned development.

Southern Water may have to provide additional wastewater infrastructure to serve new and existing customers or meet stricter environmental standards. It is likely that there would be limited options with regard to location, as the infrastructure would need to connect into existing networks. The National Planning Practice Guidance (NPPG) recognises this scenario and states that *'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'*. Therefore, utility infrastructure is considered to constitute the 'very special circumstances' under which an exception may be granted to the ruling out of development in Local Green Space, envisaged by paragraph 76 of the National Planning Policy Framework (NPPF).

Proposed amendment

Accordingly, we propose the following amended wording to policy EN7 (new wording underlined):

Proposals for the development of these areas will not be permitted, unless it is essential to meet specific utility infrastructure needs, and where it has been demonstrated that no suitable alternative location is available.

Additional policy on the provision of water and wastewater infrastructure

We welcome the inclusion of Policy FI 5: Surface Water Management as an appropriate means of reducing flood risk in collaboration with the relevant flood authorities. However, to contribute to sustainable development over the lifetime of the Amberley Neighbourhood Plan, and to aid the reduction of flood and pollution risk, Southern Water would recommend the inclusion of a policy for the provision of utility infrastructure within Section 5.4 Facilities and Infrastructure. For example, it may be the case that additional wastewater treatment capacity at Amberley Wastewater Treatment Works might be required over the life time of the Neighbourhood Plan in order to serve new development, or to meet stricter environmental standards.

One of the core planning principles contained in paragraph 17 of the NPPF is 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*' [our highlight]. Also the National Planning Practice Guidance states that '*Adequate water and wastewater infrastructure is needed to support sustainable development*'.

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

On this basis, we propose the following policy provision, which could be included at the end of Section 5.4: Facilities and Infrastructure:

Policy FI 7 - Utility Infrastructure

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