



New Milton Town Council

Your Ref:

By Email

Our Ref:

Date:
01 May 2018

Contact:
[REDACTED]

Dear Sir/Madam,

New Milton Neighbourhood Plan – Pre-Submission

Thank you for the opportunity to comment on the pre-submission New Milton Neighbourhood Plan.

Southern Water is the statutory wastewater undertaker for New Milton parish, and is committed to ensuring the right infrastructure in the right place at the right time in collaboration with New Milton Town Council, developers and the Local Planning Authority. The 'made' New Milton Neighbourhood Plan, together with the adopted New Forest District Local Plan and the New Forest National Park Authority 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 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. However, we will assess local infrastructure, such as a local sewer connection point, for its ability to accommodate new development on a site by site basis. Where additional capacity is shown to be required, development should be delivered in parallel with the new infrastructure required to service it, in order to avoid sewer flooding and/or potential pollution incidents.

We look to New Milton Town Council, New Forest District Council and the New Forest National Park Authority to ensure through planning policies and conditions that development is coordinated with the provision. 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.

Please find following our response in respect of specific policies. We hope that you will find this 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 future progress.

Yours faithfully,



Planning Assistant

Policy NM4 Land South of Gore Road

The New Milton Neighbourhood Plan identifies the above site as able to deliver "at least 160" dwellings. In accordance with paragraph 162 of the National Planning Policy Framework (NPPF), and National Planning Practice Guidance, undertaken a desk study of the impact of the proposed development on the existing public sewer network. This indicates that connection at the "practical point of connection" as defined in the New Connections Services implemented from 1st April 2018, could lead to an increased risk of flooding unless network reinforcement is undertaken.

This reinforcement will be provided through the New Infrastructure charge but Southern Water will need to work with site promoters to understand the development program and to review to ensure the delivery of network reinforcement aligns with the occupation of the development.

This is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of sewerage infrastructure, in order to prevent the increased risk of flooding.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure.

Proposed amendment:

Accordingly, we propose the following additional criteria to policy NM4 (new text underlined):

j. Occupation of the development is phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

Policy NM5 Land at Caird Avenue

The New Milton Neighbourhood Plan identifies the above site as able to deliver "approximately 100" dwellings. In accordance with paragraph 162 of the NPPF, and the National Planning Practice Guidance, we have undertaken a preliminary assessment of the site in relation to our existing infrastructure.

Our assessment reveals that Southern Water's underground infrastructure crosses the site, which needs to be taken into account when designing the site layout. An easement would be required, which may affect the site layout or require diversion. This easement should be clear of all proposed buildings and substantial tree planting.

Proposed amendment:

Accordingly, we propose the following additional criteria to policy NM5 (new text underlined):

f. The layout of the site is planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes

Additional policy on the provision of water and wastewater infrastructure

Southern Water is the statutory wastewater undertaker for New Milton and as such has a statutory duty to serve new development within the parish.

Although there are no current plans, over the life of the Neighbourhood Plan, it may be that we will need to provide new or improved infrastructure either to serve new development and/or to meet stricter environmental standards.

It is important to have policy provision in the Neighbourhood Plan which seeks to ensure that the necessary infrastructure is in place to meet these requirements.

We could find no policies to support the provision of new or improved infrastructure. 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*'. Also the National Planning Practice Guidance states that '*Adequate water and wastewater infrastructure is needed to support sustainable development*'.

Although the Town 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.

Proposed amendment

To ensure consistency with the NPPF and facilitate sustainable development, we propose an additional policy as follows:

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other policies in the plan