



Danielle Dunn
Planning Policy Team
Ashford Borough Council

By email only to
planningpolicy@ashford.gov.uk

Your Ref:

Our Ref:

Date:
20 October 2016

Contact:
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Dear Danielle Dun,

Pluckley Neighbourhood Plan – Submission

We welcome the opportunity to comment on the Submission version of the Pluckley Neighbourhood Plan. Our advice in relation to the Submission Plan reflects the advice given to Pluckley Parish Council at the pre-Submission stage.

Southern Water is the statutory sewerage undertaker for Pluckley, with a duty to serve new development, and as such 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' Pluckley Neighbourhood Plan, together with the adopted Ashford 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, 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 Pluckley Parish and Ashford Borough Councils to ensure, through planning policies and 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.

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Having regard to the above, 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,

Kirsten Williamson
Planning Coordinator

Policy H2 - Housing Site Allocations

The Neighbourhood Plan identifies that site C could provide up to 25 residential units. In line with paragraph 162 of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, we have undertaken a preliminary assessment of the existing capacity of our infrastructure and its ability to meet the forecast demand for this proposal. Our assessment reveals that the local sewerage system currently has limited capacity to accommodate additional development at this scale. This is not a constraint to development however, provided planning policy for this site ensures that proposed development makes a connection to the sewerage network at the nearest point of adequate capacity.

If development is permitted to proceed where there is inadequate capacity in the sewerage network, without such policy provision Southern Water has limited powers to prevent connection and the system could become overloaded, leading to 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.

Furthermore, there could be a risk that the necessary local sewerage infrastructure will not be delivered in time to service the proposed development, unless delivery is supported by planning policies and subsequently in planning conditions. This is supported by the core planning principles identified in the NPPF, notably 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'* and ensure that plans *'provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency'*. Our approach is also supported by paragraph 21 of the NPPF, which requires that planning policies should recognise and seek to address any lack of infrastructure. The National Planning Practice Guidance specifies that *'Adequate water and wastewater infrastructure is needed to support sustainable development'*.

Proposed amendment

To ensure consistency with the NPPF as well as to meet the requirements of the Basic Conditions set out in the National Planning Practice Guidance (in particular (a) having regard to national policy and advice, (d) contributing to the achievement of sustainable development and (e) general conformity with the strategic policies in the development plan) we propose the following text (underlined) be added to Policy H2, to relate only to Site C:

Policy H2 C. Site C up to 25 dwellings. Development at Site C should connect at the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

Additional policy on the provision of water and wastewater infrastructure

We could find no specific policies to provide for new or improved infrastructure to support development. The **National Planning Policy Framework (NPPF)** outlines the importance of achieving sustainable development and paragraph 177 states that *'It is equally important to ensure that there is a reasonable prospect that planned infrastructure is delivered in a timely fashion....For this reason, infrastructure and development policies should be planned at the same time'*. 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.

Proposed amendment

On this basis, we propose the following additional policy to ensure consistency with the NPPF as well as to meet the requirements of the Basic Conditions set out in the National Planning Practice Guidance (in particular (a) having regard to national policy and advice, (d) contributing to the achievement of sustainable development and (e) general conformity with the strategic policies in the development plan):

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