



## Representation Form

### Loxwood Neighbourhood Plan

The Neighbourhood Planning (General) Regulations  
2012 - Regulation 16

Loxwood Neighbourhood Plan Steering Group 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 Loxwood Neighbourhood Plan and supporting documents are available to view on the District Council's website: <http://www.chichester.gov.uk/neighbourhoodplan>.

**All comments must be received by 5:00pm on 4<sup>th</sup> December 2014.**

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**

All comments will be publicly available, and identifiable by name and organisation (where applicable). Please note that any other personal information provided will be processed by Chichester District Council in line with the Data Protection Act 1998.

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

<b>PART A</b>	<b>Your Details</b>
<b>Full Name</b>	Clare Gibbons
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<b>Organisation (if applicable)</b>	Southern Water
<b>Position (if applicable)</b>	Development Manager
<b>Date</b>	November 2014

## PART B

To which part of the document does your representation relate?

Paragraph Number		Policy Reference:	9 (Infrastructure – Foul Water Policy)
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Do you support, oppose, or wish to comment on this paragraph? (Please tick one answer)

Support  Support with modifications X Oppose  Have Comments

**Please give details of your reasons for support/opposition, or make other comments here:**

Previous representation

In principle, we support the provision of a policy that seeks to address the requirement to provide local sewerage infrastructure. Such policy provision is in line with paragraph 157 of the National Planning Policy Framework (NPPF) that requires positive planning for '*the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework*'.

Southern Water looks to ensure that site specific infrastructure is provided in parallel with new development as the development comes forward. This approach ensures that new infrastructure is not left idle for long period of time if there are delays to planned development.

It is often difficult to predict precisely when development is likely to come forward within the life time of a Neighbourhood Plan. There can be significant delays, for example for economic reasons.

Furthermore, Ofwat, the water industry's economic regulator, takes the view that local infrastructure that is specifically required to service an individual site should be funded by that development. This ensures that the infrastructure is paid for by those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Connection to the sewerage system at the nearest point of adequate capacity is the mechanism by which the developer can provide the local infrastructure required to serve the site. Site specific infrastructure required to achieve this is initiated by the developer as and when required. Southern Water will take future income from customers into account, so that the developer would only need to fund a proportion of the total cost.

The critical issue is therefore not whether the sewerage improvements referred to in Policy 9 are "planned" but rather whether they can be delivered in parallel with the development. Even if improvements are not programmed by Southern Water – for the reasons explained above – development can come forward, subject to the necessary improvements being identified and provided in parallel with it. We look to planning policies and planning conditions to ensure that this is achieved.

Accordingly, we consider that the following text (new text underlined) should be added to the end of policy 9: '*...or through planned improvements to the system in advance of the construction of the development or can be provided in time to serve it*'.

Update

We welcome the examiner's support for our amendment as outlined above. We note that the final version of the NDP seeks to address this requirement for local infrastructure but requires it to be in

place in advance of construction of the development. In our view, the infrastructure could be provided in parallel with the development.

(Continue on separate sheet if necessary)

**What improvements or modifications would you suggest?**

We suggest the following amended wording to policy 8:

*'New developments will be permitted only if the network can accommodate the additional demand for sewerage disposal either in its existing form or through planned improvements to the system, or can be provided in time to serve it ~~in advance of the construction of the development~~'.*

(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.