



Plaistow and Ifold Parish Council

Your Ref:

By Email: clerk@plaistowandifold.org.uk

Our Ref:

Date:
20 October 2017

Contact:
01273 663742

Dear Sir/Madam,

Plaistow and Ifold Parish Neighbourhood Plan – Regulation 14 Consultation Draft

We welcome the opportunity to comment on the above version of the Plaistow and Ifold Neighbourhood Plan.

We note that one site of 11 new dwellings is proposed within the Neighbourhood Plan area. Please find following our response in respect of specific policies. It should be noted that Ofwat, the water industry's economic regulator, takes the view that local infrastructure, such as site specific sewers required to serve individual housing development sites, should be delivered by the development. 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.

Strategic infrastructure, such as extensions to wastewater treatment works, may be required to accommodate new development within a wastewater catchment as a whole, and this is planned and funded through the water industry's 5 yearly price review process. This process does not require involvement from developers, other than a potential need to coordinate delivery.

We hope that you will find this response useful and that it will be taken into account in the next version of your Neighbourhood Plan. We would be grateful to be kept informed of future progress.

Yours faithfully,

G Fensome

Gillian Fensome
Planning Coordinator

Community infrastructure

Policy CI1 - Reducing and Avoiding Flood Risk (page 15)

We support the requirement in Policy CI1 for all new development to provide for adequate foul drainage capacity.

However, we note the comments under "Justification" (section 5.4) and have investigated the incidents of effluent discharges reported to Southern Water over the last 5 years. Based on our customer service management system records from 2013-2017, the number of hydraulic overload incidents reported to Southern Water have not significantly increased, however we do appreciate that the number of reported incidents may not accurately reflect what is happening on the ground. We would also point out that we are not the authority responsible for surface water flooding, and that the relevant authority would be dependent on the source of flooding (eg rivers, ditches or blocked highways drains)

We would therefore suggest that the following amendments are made to the section, in order to more accurately reflect the situation regarding surface and foul water drainage in the area:

"The surface and foul water drainage systems serving the residential parish communities of Durfold Wood, Plaistow and Shillinglee operate reasonably well, with only a few isolated locations of surface-water flooding on low lying roads during periods of extensive rainfall. However, Ifold is ~~not so well served because it~~ located further down the catchment and therefore takes all the foul drainage from the other settlements of Durfold Wood and Plaistow passes through before transferring to the Brewhurst Mill pumping station in Loxwood. There have been frequent occurrences of surface water flooding together with occasional effluent discharge from sewage access chambers during episodes of prolonged and high levels of rainfall. Whilst Ifold's sewer system has suffered problems from its initial installation (on or around 1965), the periods of effluent discharge and flooding have ~~considerably~~ increased over recent years which may be due to excessive 'windfall' development within the Settlement Boundary and without appropriate amendment to the sewer infrastructure both within Plaistow & Ifold Parish but also in Loxwood Parish which hosts the Brewhurst Mill pumping station and also receives effluent from Alfold Parish in Surrey."

Additional policy on the provision of water and wastewater infrastructure

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

Whilst only one site of 11 new dwellings is proposed for the Plaistow and Ifold Neighbourhood Plan area over the next 15 years, it is possible that we will need to provide new or improved infrastructure over the Plan period 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 that explicitly 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 Parish Council is not the planning authority in relation to water or 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, which can be inserted at the end of Policy C11 - Reducing and Avoiding Flood Risk (page 16):

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