Name of the DPD to which this representation relates:

New Forest District (outside the National Park)
Local Plan Part 2: Sites and Development Management

Please return to New Forest District Council by 15 November 2013

Please note that your representation will be made available for public viewing at Appletree Court, Lyndhurst and via the Council’s website. (Personal information such as signatures and telephone numbers will not be published on the website).

There are two sections –
Part A – Personal Details
Part B – Your representation(s).

Please fill in Part A, and a separate Part B for each representation you wish to make.

Part A

1. Personal Details**

* Mandatory field

**If an agent is appointed, please complete the Title, Name and Organisation boxes for your client in 1, plus the full contact details of the agent in 2.
If you have previously made representations on this Plan, please give your representee ref. here: 

<table>
<thead>
<tr>
<th>Title</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>First Name</td>
<td>Clare</td>
</tr>
<tr>
<td>Last Name*</td>
<td>Gibbons</td>
</tr>
<tr>
<td>Job Title (where relevant)</td>
<td>Development Manager</td>
</tr>
<tr>
<td>Organisation (where relevant)</td>
<td>Southern Water</td>
</tr>
<tr>
<td>Address Line 1*</td>
<td>Southern House</td>
</tr>
<tr>
<td>Line 2</td>
<td>Lewes Road</td>
</tr>
<tr>
<td>Line 3</td>
<td>Brighton</td>
</tr>
<tr>
<td>Line 4</td>
<td></td>
</tr>
<tr>
<td>Post Code*</td>
<td>BN1 9PY</td>
</tr>
<tr>
<td>Telephone Number</td>
<td>01273 663143</td>
</tr>
<tr>
<td>E-mail Address</td>
<td><a href="mailto:Planning.policy@southernwater.co.uk">Planning.policy@southernwater.co.uk</a></td>
</tr>
</tbody>
</table>

(Where an email address is given, this will be used as the primary means of contact)
Part B – Please use a separate sheet for each representation
(Part A MUST also be completed)

Name or Organisation:

3. To which matter does this representation relate?
   i. Main Modification to the Local Plan Part 2: Sites and Development Management
      Main Modification Ref. (i.e. MM1) MM22
      Local Plan Part 2: Para. or Policy number

   OR
   ii. The draft Mitigation Strategy Supplementary Planning Document
       Draft Mitigation Strategy
       Paragraph No.
       or Project Reference

   OR
   iii. If you wish to comment on the Infrastructure Delivery Plan tick here.

If commenting on a modification to the Local Plan Part 2 (including the revised Habitats Regulations Assessment and Sustainability Appraisal) please fill in sections 4 – 9.
If commenting on the draft Mitigation Strategy, please fill in section 10.
If commenting on the Infrastructure Delivery Plan, please fill in section 11.

4. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is:
   4.(1) Legally compliant
        (4.2) Sound*

   Yes
   No

   (* The considerations in relation to the DPD being ‘Sound’ are explained in the National Planning Policy Framework)
   If you have entered No to 4.(2), please continue to Qu 5. In all other circumstances, please go to Qu 6.

5. On this matter, do you consider the Local Plan Part 2: Sites and Development Management is unsound because it is not:
   (1) Justified
   (2) Effective
   (3) Consistent with national policy

   x
   x
6. Please give details of why you consider the Local Plan Part 2 (as proposed to be modified by the Main Modifications) is not legally compliant or is unsound on this matter.
If you wish to support the legal compliance or soundness of the Local Plan Part 2: Sites and Development Management, please also use this box to set out your comments.

- It is noted that proposed modification MM22 adds a reference to ‘Policy CS8 Community services and infrastructure: Regarding the provision of appropriate infrastructure to serve development’. However, Southern Water still considers that wastewater infrastructure requirements should be cited within the site specific proposals, as the main purpose of the ‘Sites and Development Management Development Plan Document’ (DPD) is to provide the detailed planning policies and proposals for New Forest District (outside of the National Park).

Paragraph 162 of the National Planning Policy Framework (NPPF) requires local planning authorities to work with providers to assess the quality and capacity of infrastructure for wastewater to meet forecast demands. As indicated in our representations, Southern Water has undertaken capacity assessments for the sites contained within the DPD and the associated proposed modifications. These assessments indicate that for a significant number of sites there is insufficient capacity to accommodate the proposed residential developments. This is not a constraint but infrastructure would be required to connect the development at the nearest point of adequate capacity. Also it is important that the necessary local sewerage infrastructure is delivered in phase with development and this can be achieved through policy recognition.

Southern Water is not fully funded to provide local sewerage infrastructure, as Ofwat, the water industry’s economic regulator, expects the company to recover new development and growth costs from developers. Policy provision would provide early warning to developers of the requisite infrastructure arising directly from proposed residential development and ensure its delivery. If the infrastructure is not delivered, the sewers would become overloaded, leading to foul water flooding and pollution of the environment. This would be contrary to paragraph 109 of the NPPF which states ‘The planning system should contribute to and enhance the natural and local environment by…preventing both new and existing development from contributing to …unacceptable risk from…..pollution’.

Overall, the policy provision that Southern Water seeks is in line with one of the core planning principles cited in the NPPF, which requires that planning should ‘proactively drive and support sustainable economic development to deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs’. Also paragraph 157 of the NPPF that requires positive planning ‘for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework’.

(Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the Local Plan Part 2 legally compliant or sound on this matter, having regard to the test you have identified at 5 above where this relates to soundness. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of the relevant policy or text. Please be as precise as possible.

Sites TOT1, TOT3, TOT6, TOT11, HYD1, LYM1, LYM2, MoS1, NMT2 and NMT3 should include a site specific criterion to require the developer to connect to the sewerage system at the nearest point of adequate capacity. This approach is justified and will make the policy effective in terms of infrastructure delivery and consistent with the National Planning Policy Framework. The proposed site specific criterion is as follows:

* provision of a connection to the sewerage system at the nearest point of adequate capacity.

(Continue on a separate sheet /expand box if necessary)

8. If your representation is seeking a change to the Local Plan Part 2, do you consider it necessary to participate at the oral part of the examination?

- No, I do not wish to participate at the oral examination
- Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

Comments on other documents, for consideration by NFDC.

10. Please state here your comments on the draft Mitigation Strategy.

11. Please state here your comments on the Infrastructure Delivery Plan.
Representations should be posted to:
Policy and Plans Team
New Forest District Council
Appletree Court
Beaulieu Road
Lyndhurst
Hampshire
SO43 7PA

Or e-mailed to: sdmrepresentations@nfdc.gov.uk

Representations should be received by no. later than 5pm on 15th November 2013.