

**Winchester City Council
Local Plan Part 2:
Development Management and Site Allocations**

Statement from Southern Water

June 2016

**Local Plan Part 2 Examination
Planning Inspector's Matters 12/13**

Wickham - Policies WK1 to 3
South Hampshire Urban Areas - Policies SHUA1 to 5

- i) Are the policies and proposals for growth and change in this area appropriate and justified, including in relation to the NPPF/PPG, and in terms of environmental, economic and social impact?*
- ii) Are they clear and deliverable, including in respect of the associated infrastructure requirements?*

1. Introduction

1.1 Southern Water is the statutory sewerage undertaker for the village of Wickham and South Hampshire Urban Areas. The company does not supply water to Wickham, but does supply to the area covered by policies SHUA1 to 5 (Whiteley South).

1.2 The company is a Flood Risk Management Authority (FRMA) with responsibility for managing the risk of flooding from public sewerage systems including those that receive surface water from buildings and yards.

1.3 The company is not responsible for the risk of flooding from rivers, surface water, ordinary and minor watercourses, or groundwater, which should be dealt with by land drainage. The Wickham Flood Investigation Report published by Hampshire County Council in June 2015 indicates that such sources of flooding affect the village and adversely impact the functioning of the sewerage system. The sewerage system is not designed to take flood water that should be dealt with by land drainage.

1.4 For clarity, we comment on each policy linked to Matters 12 and 13 in turn below.

2. Policy WK1 - Drainage Infrastructure

2.1 Policy WK1 states that development will only be permitted at Wickham provided that development does not increase the risk flooding and is acceptable in planning terms. The policy lists three requirements that are necessary in order for these principles to be met.

2.2 Southern Water considers that the principle that new development should not lead to an increased risk of flooding is appropriate and justified in relation to the NPPF/PPG (National Planning Policy Framework/Planning Practice Guidance). From a foul water drainage perspective (for which Southern Water is responsible) an unacceptable increase in the risk of flooding from the public sewerage system as a result of new development would lead to pollution of the environment contrary to paragraph 109 of the NPPF. Where new development is expected to increase the risk of flooding mitigation is required to protect the environment as well as prevent social impact on customers and ensure the development is made acceptable in planning terms.

2.3 Criterion (i) of Policy WK1 requires a co-ordinated multi-agency strategy for dealing with existing flooding issues in Wickham. We agree that a multi-agency approach is required in order to resolve the existing risk of flooding in the area. However, from an engineering perspective it is conceivable that a site-specific solution could be found and that development could come forward without increasing the risk of flooding ahead of the multi-agency strategy being finalised. It is up to individual development proposals to demonstrate to the satisfaction of the planning authority, in collaboration with

the LLFA and FRMAs, that the proposal will not unacceptably increase the risk of flooding.

2.4 In the context of this matter it would be relevant to note that Southern Water is a statutory sewerage undertaker and is unable to refuse new foul water connections to our network even if there is a pre-existing risk of flooding. Such refusal would be contrary to our statutory obligations. It is our role to find solutions to mitigate any adverse effects and deliver those solutions in collaboration with developers, the planning authority and other stakeholders. As a minimum we seek to ensure that the existing risk of sewer flooding is not made worse. We look for opportunities to bring down the risk of sewer flooding where funding allows. We prioritise flooding inside homes and the most cost-effective schemes across our operational area, which stretches from Kent through Sussex, Hampshire and the Isle of Wight. It is not possible to reduce the risk of sewer flooding in all locations and at the same time maintain affordable bills to our customers. Therefore we need to use resources where the most benefit is delivered to our customers overall, without triggering excessive bills.

2.5 The principle of no deterioration as a minimum is supported by town & country planning principles but it would not be justified for Southern Water to ask new development to contribute to betterment, i.e. the reduction of a pre-existing risk of sewer flooding. However, it may be possible for some developments to contribute to this goal overall. We support the planning authority's intention to do so where possible, particularly if poor land drainage is addressed, thereby removing surface water entering the sewerage network and compromising its functioning.

2.6 We also take this opportunity to point out that Southern Water has undertaken a Drainage Area Plan (DAP) in Wickham to assess the performance of the sewerage network with respect to hydraulic, structural, operational and environmental criteria. Based on the work to date it is unlikely that Southern Water would be in a position to progress mitigation measures to resolve the existing flood risk without collaboration with, and co-operation from, the LLFA and other FRMAs including Winchester City Council (for example to remove surface water that enters our sewerage system following periods of prolonged rainfall).

2.7 In this context it should be recognised that Ofwat, the water industry's economic regulator, reviewed the performance of Southern Water's sewer network in Wickham in 2013/14. They took account of data collected from flow surveys as well as EA flood maps and concluded that the area is effectively drained from a foul water drainage perspective and therefore Southern Water meets its duty under Section 94 of the Water Industry Act 1991. Nevertheless, we are fully committed to working in partnership with the LLFA and other FRMAs to consider measures to reduce the existing risk of flooding from other sources that adversely impact our assets.

2.8 In the meantime new development can progress in the catchment from Southern Water's perspective providing the existing risk of flooding is not increased.

3. Policy WK2 - Winchester Road Housing and Open Space Allocation

3.1 This policy allocates sites at Winchester Road and Mill Lane for about 125 dwellings and public sports provision.

3.2 The policy recognises under *Other Infrastructure* that there is a requirement to provide a connection to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.

3.3 We consider that this approach is justified as it reflects representations from Southern Water following a site-specific assessment which revealed that the current capacity of the local sewerage system is insufficient to accommodate the anticipated demand from the development. Provision of necessary infrastructure is therefore required to serve the development, and the policy will support delivery of the requisite infrastructure in parallel with development. This is consistent with the general principle set out in paragraph 17 of the National Planning Policy Framework which seeks to ensure that the planning system supports delivery of infrastructure necessary for sustainable development. It is also consistent with paragraph 109 because pollution of the environment would occur if the development is not co-ordinated with necessary infrastructure and the sewerage system becomes overloaded.

3.4 In summary, we have not identified any fundamental reasons why the development could not come forward but necessary wastewater infrastructure will need to be delivered in parallel with development.

4. Policy WK3 - The Glebe Housing and Open Space Allocation

4.1 This policy allocates land at the southern end of The Glebe for about 80 dwellings and public open space.

4.2 The policy recognises under *Other Infrastructure* that there is a requirement to provide a connection to the local sewerage system at the nearest point of adequate capacity, in collaboration with the service provider.

4.3 We consider that this approach is justified as it reflects representations from Southern Water following a site-specific assessment which revealed that the current capacity of the local sewerage system is insufficient to accommodate the anticipated demand from the development. Provision of necessary infrastructure is therefore required to serve the development, and the policy will support delivery of the requisite infrastructure in parallel with development. This is consistent with the general principle set out in paragraph 17 of the National Planning Policy Framework which seeks to ensure that the planning system supports delivery of infrastructure necessary for sustainable development. It is also consistent with paragraph 109 because pollution of the

environment would occur if the development is not co-ordinated with necessary infrastructure and the sewerage system becomes overloaded.

4.4 In summary, we have not identified any fundamental reasons why the development could not come forward but necessary wastewater infrastructure will need to be delivered in parallel with development in collaboration with the service provider.

5. Policy SHUA1 - Whiteley Green Housing Allocation

5.1 This policy allocates land at Whiteley Green for about 75 homes.

5.2 Southern Water carried out a site specific assessment which revealed that both the local water supply network and the local sewerage system currently has sufficient capacity to serve the residential development proposed.

5.3 We have not identified any fundamental reasons why the development could not come forward.

6. Policy SHUA2 - Solent 1 Employment Allocation

6.1 Southern Water is unable to assess the demand of this proposed development on our infrastructure until specific proposals come forward. This is because it will depend on the specific nature of the employment use (e.g. an office use is likely to have lower requirements than those using industrial processes). We consider that the requirement for the development to contribute towards infrastructure (as set out under the heading *Other Infrastructure*) is appropriate and justified by the principles set out in paragraph 17 of the National Planning Policy Framework. This requires planning to proactively drive and support delivery of necessary infrastructure.

6.2 We have not identified any fundamental reasons why the development could not come forward provided it is co-ordinated with provision of necessary sewerage and water supply infrastructure in collaboration with the service provider.

7. Policy SHUA 3 - Solent 2 Employment Allocation

7.1 Southern Water is unable to assess the demand of this proposed development on our infrastructure until specific proposals come forward. This is because it will depend on the specific nature of the employment use (e.g. an office use is likely to have lower requirements than those using industrial processes). We consider that the requirement for the development to contribute towards infrastructure (as set out under the heading *Other Infrastructure*) is appropriate and justified by the principles set out in paragraph 17 of the National Planning Policy Framework. This requires planning to proactively drive and support delivery of necessary infrastructure.

7.2 We have not identified any fundamental reasons why the development could not come forward provided it is co-ordinated with provision of necessary sewerage and water supply infrastructure in collaboration with the service provider.

8. Policy SHUA 4 - Little Park Farm Employment Allocation

8.1 Southern Water is unable to assess the demand of this proposed development on our infrastructure until specific proposals come forward. This is because it will depend on the specific nature of the employment use (e.g. an office use is likely to have lower requirements than those using industrial processes). We consider that the requirement for the development to contribute towards infrastructure (as set out under the heading *Other Infrastructure*) is appropriate and justified by the principles set out in paragraph 17 of the National Planning Policy Framework. This requires planning to proactively drive and support delivery of necessary infrastructure.

8.2 We have not identified any fundamental reasons why the development could not come forward provided it is co-ordinated with provision of necessary sewerage and water supply infrastructure in collaboration with the service provider.

9. Policy SHUA5 - Botley Bypass Safeguarding

9.2 Southern Water expects highway runoff from the proposed Bypass to be considered in consultation with the Lead Local Flood Authority. Connection of highway drainage to infrastructure owned by Southern Water would be subject to agreement.