

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Ms	First Name*	Charlotte
Surname*	Mayall		
Organisation* (If responding on behalf of an organisation)	Southern Water		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*			
		Postcode	

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General
N/A

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Paragraph Ref	Specific Comments
Policy NA4	<p data-bbox="395 636 959 674">Land south of London Road, Picket Twenty</p> <p data-bbox="395 696 1382 981">Southern Water is the statutory water and wastewater undertaker for Andover. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local water supply infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development aligns with the delivery of upgraded infrastructure.</p> <p data-bbox="395 1016 1386 1339">Proposals for 90 dwellings at this site will generate a need for reinforcement of the water supply network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to water supply low pressure issues unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1375 1350 1518">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF).</p> <p data-bbox="395 1554 1358 1626">Having regard to the above, Southern Water proposes the following additional criterion to Policy NA4 (new text underlined):</p> <p data-bbox="395 1662 1350 1733"><u><i>e. Occupation of development will be phased to align with the delivery of water network reinforcement, in consultation with the service provider.</i></u></p>

Paragraph Ref	Specific Comments
Policy NA5	<p data-bbox="395 277 791 313">Land at Manor Farm, Andover</p> <p data-bbox="395 338 1385 622">Southern Water is the statutory water supplier and wastewater undertaker for Andover. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 660 1385 981">Proposals for 800 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1019 1374 1265">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1303 1374 1480">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1518 1378 1765">In addition, this approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), '<i>Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.</i>'</p> <p data-bbox="395 1803 1358 1872">Having regard to the above, Southern Water proposes the following additional criterion to Policy NA5 (new text underlined):</p> <p data-bbox="395 1910 1318 1980"><u>h. Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></p>

Paragraph Ref	Specific Comments
Policy NA6	<p data-bbox="395 286 614 315">Land at Bere Hill</p> <p data-bbox="395 342 1385 622">Southern Water is the statutory water and wastewater undertaker for Andover. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that both existing local sewerage infrastructure and water supply infrastructure to the site have limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new infrastructure.</p> <p data-bbox="395 667 1385 1014">Proposals for 1,400 dwellings at this site will generate a need for reinforcement of the water supply and wastewater networks in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of sewer flooding and low water pressure issues unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1059 1385 1305">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our suggested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1350 1385 1518">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1563 1385 1798"><i>This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1843 1385 2056">Our initial assessment of this site has also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p data-bbox="1257 2056 1353 2085" style="text-align: right;"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p data-bbox="395 286 1361 353">Having regard to the above, Southern Water proposes the following additional criteria to Policy NA6 (new text underlined):</p> <p data-bbox="395 394 1342 495"><i><u>i. Occupation of development will be phased to align with the delivery of water supply and wastewater network reinforcement, in consultation with the service provider.</u></i></p> <p data-bbox="395 535 1358 602"><i><u>j. Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
Policy NA7	<p data-bbox="395 288 719 315"><u>Land east of Ludgershall</u></p> <p data-bbox="395 342 1374 622">Southern Water is the statutory wastewater undertaker for Ludgershall. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development aligns with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 667 1385 981">Proposals for 350 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1025 1374 1272">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1317 1374 1485">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1529 1374 1776">In addition, this approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), '<i>Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.</i>'</p> <p data-bbox="395 1821 1358 1877">Having regard to the above, Southern Water proposes the following additional criterion to Policy NA7 (new text underlined):</p> <p data-bbox="395 1921 1318 1977"><u><i>g. Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</i></u></p>

Paragraph Ref	Specific Comments
Policy NA8	<p data-bbox="395 286 798 315">Land south east of Ludgershall</p> <p data-bbox="395 342 1374 622">Southern Water is the statutory wastewater undertaker for Ludgershall. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 667 1385 981">Proposals for 1150 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1025 1374 1272">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1317 1374 1485">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1529 1369 1776">This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), <i>'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1821 1378 1989">In addition to the above, it should be noted that this site is within 100m of Ludgershall Wastewater Treatment Works (WTW), which could potentially have an unacceptable impact on the amenity of the site's future occupants arising from the WTW's essential operational activities. Such impacts may include odour from wastewater processing, and noise and vibration from wastewater pumping.</p> <p data-bbox="1273 2022 1362 2051"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p>Whilst we support the inclusion of (h) requiring an odour assessment, we have suggested below some amendments to wording to ensure it is clear that this is in relation to the WTW, and that the odour assessment should be carried out in consultation with Southern Water, as operator of the WTW.</p> <p>Having regard to the above, Southern Water proposes the following additional criterion and amendments to Policy NA8 (new text underlined):</p> <p><i>h) An odour assessment <u>to be carried out in consultation with Southern Water, and appropriate mitigation in relation to nearby sources Ludgershall WTW.</u></i></p> <p><i>i) <u>Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></i></p>

Paragraph Ref	Specific Comments
Policy SA4	<p data-bbox="395 286 884 315">Land south of Ganger Farm, Romsey</p> <p data-bbox="395 342 1394 622">Southern Water is the statutory water supplier and wastewater undertaker for Romsey. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development aligns with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 667 1394 981">Proposals for 340 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1025 1394 1272">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1317 1394 1485">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1529 1394 1776">This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), <i>'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1821 1394 2022">Our initial assessment of this site has also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p data-bbox="1257 2056 1347 2085"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p data-bbox="395 286 1393 353">Having regard to the above, Southern Water proposes the following additional criteria to Policy SA4 (new text underlined):</p> <p data-bbox="395 387 1321 454"><i><u>f) Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></i></p> <p data-bbox="395 499 1369 566"><i><u>g) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
Policy SA5	<p data-bbox="395 286 852 315">Land south of the Bypass, Romsey</p> <p data-bbox="395 342 1394 622">Southern Water is the statutory water supplier and wastewater undertaker for Romsey. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development aligns with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 667 1394 981">Proposals for 110 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1025 1394 1272">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1317 1394 1485">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1529 1394 1776">This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), <i>'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1821 1394 2022">Our initial assessment of this site has also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p data-bbox="1265 2022 1361 2051" style="text-align: right;"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p data-bbox="395 282 1358 353">Having regard to the above, Southern Water proposes the following additional criteria to Policy SA5 (new text underlined):</p> <p data-bbox="395 389 1318 461"><i><u>g) Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></i></p> <p data-bbox="395 497 1366 568"><i><u>h) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
Policy SA6	<p data-bbox="395 286 687 315">Land at Velmore Farm</p> <p data-bbox="395 342 1374 656">Southern Water is the statutory water supplier and wastewater undertaker for Valley Park. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 701 1385 1014">Proposals for 1070 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1059 1374 1305">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1350 1374 1518">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1563 1369 1798"><i>This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), 'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1843 1382 2056">Our initial assessment of this site has also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p data-bbox="1265 2056 1358 2085"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p data-bbox="395 282 1358 353">Having regard to the above, Southern Water proposes the following additional criteria to Policy SA6 (new text underlined):</p> <p data-bbox="395 389 1318 461"><i><u>j) Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></i></p> <p data-bbox="395 497 1362 568"><i><u>k) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
Policy SA8	<p data-bbox="395 286 655 315">Land at Upton Lane</p> <p data-bbox="395 342 1385 622">Southern Water is the statutory water supplier and wastewater undertaker for Upton. As such, we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided planning policy and subsequent conditions ensure that occupation of the development aligns with the delivery of new wastewater infrastructure.</p> <p data-bbox="395 667 1385 981">Proposals for 80 dwellings as well as the commercial element at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation.</p> <p data-bbox="395 1025 1385 1272">Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited; water companies are not statutory consultees on planning applications, and under Section 106 of the Water Industry Act, developers have a right to connect foul drainage on 21 days' notice to the public sewer network. It is therefore important that our requested criterion is included in the site allocation policy to ensure that it is considered as an essential part of planning for the site's delivery.</p> <p data-bbox="395 1317 1385 1485">Planning policies and conditions play an important role in ensuring that development is coordinated with the provision of the infrastructure required to serve it, in accordance with paragraphs 8(a) and 11(a) of the revised National Planning Policy Framework 2023 (NPPF) and does not contribute to flooding or pollution of the environment, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1529 1385 1776">This approach is also supported by National Planning Practice Guidance (NPPG, Paragraph: 019 Reference ID: 34-019-20140306), <i>'Good design and mitigation measures can be secured through site specific policies for allocated sites [...]. For example, they can be used to ensure that new development and mains water and wastewater infrastructure provision is aligned and to ensure new development is phased and not occupied until the necessary works relating to water and wastewater have been carried out.'</i></p> <p data-bbox="395 1821 1385 2022">Our initial assessment of this site has also ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p data-bbox="1281 2056 1385 2085"><i>Contd...</i></p>

Paragraph Ref	Specific Comments
	<p>Having regard to the above, Southern Water proposes the following additional criteria to Policy SA8 (new text underlined):</p> <p><i><u>f) Occupation of development will be phased to align with the delivery of wastewater network reinforcement, in consultation with the service provider.</u></i></p> <p><i><u>g) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>
Policy SA9	<p>Land adjacent to Abbey Park Industrial Estate</p> <p>Southern Water is the statutory water supplier and wastewater undertaker for Romsey.</p> <p>Our initial assessment of this site has ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p>Having regard to the above, Southern Water proposes the following additional criterion to Policy SA9 (new text underlined):</p> <p><i><u>d) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
<p>Policy SA10</p>	<p>Land south of Botley Road, Romsey</p> <p>Southern Water is the statutory water supplier and wastewater undertaker for Romsey.</p> <p>Our initial assessment of this site has ascertained that Southern Water's infrastructure crosses the site, which needs to be taken into account when designing the layout of the proposed development. An easement width of 6 metres or more, depending on pipe size and depth, would be required, which may affect site layout or require diversion. Easements should be clear of all proposed buildings and substantial tree planting.</p> <p>Having regard to the above, Southern Water proposes the following additional criterion to Policy SA10 (new text underlined):</p> <p><i><u>e) Layout of the development must be planned to ensure future access to existing infrastructure for maintenance and upsizing purposes.</u></i></p>

Paragraph Ref	Specific Comments
CL2	<p data-bbox="395 277 539 313">Flood Risk</p> <p data-bbox="395 338 1374 707">Southern Water supports the overall intention of this policy to manage flood risk, in particular the priority given to natural flood management and drainage approaches in SuDS design. However, for major development in areas where SuDS are viable, we believe their use should be mandated. Until Schedule 3 of the Flood & Water Management Act is implemented, S106 of the Water Industry Act continues to confer a right to connect surface water to the public sewer network. Therefore, to increase the effectiveness of this policy we would encourage the prevention of any connection of developments' surface water drainage to the foul sewer network. This is to minimise the risk of sewer flooding, and increase available capacity for foul drainage.</p> <p data-bbox="395 748 1374 1099">Whilst some parts of the wastewater network were originally designed to accommodate surface water, the expansion of towns and cities, in particular of 'urban creep' can exacerbate capacity issues. As stated in Water UK's 21st Century Drainage Programme; <i>"The country's built environment is constantly changing and "urban creep" – home extensions, conservatories and paving over front gardens for parking – can all add to the amount of water going into our sewers and drains. Green spaces that would absorb rainwater are covered over by concrete and tarmac that will not. In fact, studies show that "urban creep" results in a larger increase in predicted flooding than new housing, because it adds more rainwater to these systems'.</i></p> <p data-bbox="395 1140 1350 1312">Southern Water therefore supports this policy's requirement (g) that land for flood management is safeguarded from development – and would add that any areas of land utilised for SuDS such as ponds, swales etc, should also be safeguarded from future alterations or development that would impede their effectiveness.</p> <p data-bbox="395 1352 1362 1462">We therefore support, with suggested additional wording, this policy's approach for its contribution to reducing the risk of flooding and pollution, in line with paragraphs 166 and 180(e) of the NPPF.</p> <p data-bbox="395 1503 1158 1538">Proposed amendments to Policy CL2 (new text underlined);</p> <p data-bbox="395 1579 963 1650"><i>Development will be permitted provided that;</i> [...]</p> <p data-bbox="395 1655 1350 1727">g) <i>The proposal does not prejudice land, structures and features required for current or future flood management <u>and/or sustainable drainage.</u></i></p> <p data-bbox="395 1767 1318 1803">h) <u>Surface water is not permitted to discharge to the wastewater network</u></p>

Paragraph Ref	Specific Comments
Policy CL4	<p data-bbox="395 286 774 315">Water Use and Management</p> <p data-bbox="395 342 1382 584">Southern Water supports parts (a) and (b) of this policy, requiring higher levels of water efficiency. A requirement for no more than 100l/p/d aligns with our own Target 100 program, which seeks to reduce customer consumption to this level by 2040, whilst we also work to reduce leakage by 40% in the same timeframe. This will help to protect the water environment by ensuring that existing sources are used as sustainably as possible, which in turn will contribute to achieving sustainable development and mitigating the impacts of climate change.</p> <p data-bbox="395 629 1378 835">In addition, we support parts (c) and (d) of this policy to protect water quality, along with the requirement for occupation to be aligned with the necessary infrastructure upgrades in cases where there are network capacity constraints. We would however request the removal of <i>‘connected to the nearest point of capacity’</i> as this requirement pre-dates Ofwat’s changes to the new infrastructure charging mechanism, introduced in 2018.</p> <p data-bbox="395 880 1385 1122">To increase efficacy of this policy in relation to safeguarding water quality, we would also encourage the addition of reference to the combined sewer network. A combined sewer is one originally designed to convey both surface water and wastewater in the same pipe. Despite a requirement for new systems to be separated, which has been in place for some time, until Schedule 3 of the Flood & Water Management Act is implemented, S106 of the Water Industry Act continues to confer a right to connect surface water to the combined sewer network.</p> <p data-bbox="395 1167 1385 1516">During heavy rain, combined sewer networks’ drainage capability can be exceeded by the amount of rainwater entering pipes and storage tanks connected via roads, roofs and paved areas. When these fill up, storm overflows release excess water through outfalls into rivers and the sea to prevent flooding of homes and businesses. Storm overflows are part of the network’s original design and are regulated by the Environment Agency. Over time, the expansion of urban settlements as well as ‘urban creep’ (home extensions, conservatories and paving over front gardens for parking) have incrementally added to the amount of rainwater entering sewers, increasing reliance on network pressure release via storm overflows to prevent flooding.</p> <p data-bbox="395 1561 1337 1731">The Environment Act 2021 places a legally binding duty on water companies to progressively reduce the adverse impacts of discharges from storm overflows. Work is underway to reduce reliance on these systems and by 2025, water companies will have reduced storm overflow discharges from 2020 levels by around 25%. (DEFRA, Storm Overflows Discharge Reduction Plan 2023).</p> <p data-bbox="395 1776 1369 2018">Preventing surface water from entering the foul and combined systems during heavy rainfall is the most sustainable and cost-effective way to reduce storm overflows. Southern Water is investing heavily in work to reduce their use across its region (see southernwater.co.uk/water-for-life/clean-rivers-and-seas-plan/map), in part by removing existing connections of surface water to the combined and foul networks. Allowing new connections will extend the amount of time and money needed to resolve the issue.</p>

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Paragraph Ref	Specific Comments
	<p>We therefore request the following amendments to policy CL4 (new text underlined);</p> <p><i>Prior to occupation, adequate water supply, surface water drainage, wastewater infrastructure and wastewater treatment capacity is available, or can be made available and connected to the nearest point of adequate capacity, to serve the development so as to avoid risks of adverse effects on the water environment. <u>To protect water quality, there will be a presumption against connection of surface water to the combined sewer.</u></i></p>

Paragraph Ref	Specific Comments
Policy COM1	<p data-bbox="395 286 710 315">Delivering Infrastructure</p> <p data-bbox="395 342 1356 443">As the wastewater undertaker and water supplier to Test Valley Borough, Southern Water supports this policy dedicated to the provision of infrastructure by development.</p> <p data-bbox="395 481 1380 752">However, over the lifetime of the Local Plan Southern Water may itself need to deliver improvements to existing, or provide new, strategic infrastructure (such as treatment works) in order to accommodate planned growth across catchments, and/or meet stricter water quality objectives. Southern Water therefore looks to Local Plan policies to support water companies' plans to effectively deliver infrastructure at a strategic level, as well as support for phased delivery at a local level. We note that this is referenced in supporting text paragraph 5.91, but request that this is included in policy.</p> <p data-bbox="395 790 1385 994">Page 8 of the National Policy Statement for Wastewater states that <i>'Waste water treatment is essential for public health and a clean environment. Demand for new and improved waste water infrastructure is likely to increase in response to the following main drivers: More stringent statutory requirements to protect the environment and water quality; Population growth and urbanisation; Replacement or improvement of infrastructure; Adaption to climate change.'</i></p> <p data-bbox="395 1032 1372 1133">In addition, Paragraph 20 of the revised National Planning Policy Framework (NPPF) (2018), states: <i>"Strategic policies should [...] make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</i></p> <p data-bbox="395 1171 1377 1341">In order to reflect the fact that it is often solely within the remit of the infrastructure provider, rather than the developer, to provide upgrades necessary not only to facilitate individual developments, but to better serve the wider community and/or make necessary catchment scale environmental improvements, we would seek the support of local plan policy in this regard.</p> <p data-bbox="395 1379 826 1408">Proposed addition to Policy COM1:</p> <p data-bbox="395 1447 1382 1547"><u><i>Proposals by service providers for the delivery of new or improved water supply and/or wastewater infrastructure will be supported, subject to other policies in the development plan.</i></u></p>

What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.