

**From:** [REDACTED]  
**Sent:** 30 November 2021 11:21  
**To:** PlanningPolicyConsultation  
**Cc:**  
**Subject:** Local Plan 2038 Consultation Response Form

Form Submission

Gosport Borough Local Plan 2038 Consultation Response Form

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Please provide your details

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Is an Agent/Consultant appointed? No

Please provide the Agent's/Consultant's details:

Name

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Your representation (1)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy D7: Flood Risk and Coastal Erosion

Support or Object? Support

Please summarise why: Southern Water supports the aims of this policy. However in relation to criterion 5 of this policy which seeks the implementation of SuDS in major development schemes, we would query the inclusion of parts (b) and (c) relating to the need for development to demonstrate availability of adequate capacity in 'sewerage and sewage disposal facilities'. The purpose of effective SuDS is to manage surface water without making use of existing foul drainage facilities, therefore SuDS should be required regardless of whether there is or is not adequate capacity in the foul drainage network.

However, the need remains to demonstrate either that there is available capacity in the sewer network to accommodate foul flows arising from new development, or that it can be provided prior to occupation. This is essential for managing additional foul flows arising from new development, thus mitigating the risk of foul flooding.

Therefore to ensure these important aspects of Policy D7 are retained, whilst acknowledging that they are not related, we recommend creating a separately numbered criterion for sewerage capacity, and suggest the following amendment to Policy D7:

5. Proposals for major developments in areas at risk of flooding should incorporate Sustainable Drainage Systems (SuDS). Such systems must address the following elements:

- a) be designed in accordance with the latest best practice; and
- b) ensure that surface water drainage of adequate capacity and design is available; and
- c) appropriate arrangements must be put in place for their ownership and whole life maintenance and management.

6. Proposals must ensure that sewerage, sewage disposal facilities and surface water drainage of adequate capacity are available, and where they are not, that the required capacity will be provided prior to occupation of the development.

If you have no more representations to add, please select this box

Your representation (2)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy D11: Securing Infrastructure/paragraph 2.12.27

Support or Object? Support

Please summarise why: Southern Water broadly supports Policy D11 which seeks to co-ordinate development with provision of infrastructure. This will help to ensure that a high level of service can be maintained to both new and existing customers.

However, supporting text paragraph 2.12.27 requires updating. In April 2018 the way in which water companies charge developers for new infrastructure connections was amended, meaning that developers now pay a flat rate new infrastructure charge, rather than costs being worked out on a site by site basis. Further information can be found here; <https://www.southernwater.co.uk/developing-building/connection-charging-arrangements>

On this basis, we recommend the following amendment to paragraph 2.12.27;

2.12.27 The provision of certain types of infrastructure including utilities such as local sewerage facilities will need to be secured by agreement with the relevant service provider. The developer will be required to contact the provider as early as possible in the planning process to determine whether network reinforcement will be required to accommodate development.

If you have no more representations to add, please select this box

Your representation (3)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy SS2: Gosport Waterfront – Mixed Use Redevelopment

Support or Object? Object

Please summarise why: Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from 300 dwellings proposed at Gosport Marina and Harbour Road. New and/or improved local sewerage infrastructure will therefore be required to serve the development, or separation of surface water which currently drains to the combined system.

This is not a constraint to development, provided Southern Water can 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.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the revised NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.

Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.

The need to protect existing on-site infrastructure also needs to be recognised in planning policies. Existing underground sewers and water mains are present on the site. This infrastructure must be allowed to continue to fulfil its function. It must not be damaged or built over. Appropriate easements will be required to secure future access for maintenance and upsizing purposes. Any pumping stations on site will require 15 metres clearance to the nearest habitable room.

Proposed amendment:

We propose the following additional criteria to Policy SS2:

6. Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.
7. Future access to existing wastewater infrastructure must be ensured for maintenance and upsizing purposes.

If you have no more representations to add, please select this box

Your representation (4)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy SS3: Gosport Town Centre

Support or Object? Object

Please summarise why: Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from up to 240 dwellings proposed at Gosport Bus Station. New and/or improved local

sewerage infrastructure will therefore be required to serve the development, or separation of surface water which currently drains to the combined system.

This is not a constraint to development, provided Southern Water can 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.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the revised NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.

Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.

The need to protect existing on-site infrastructure also needs to be recognised in planning policies. Existing underground sewers and water mains are present on the site. This infrastructure must be allowed to continue to fulfil its function. It must not be damaged or built over. Appropriate easements will be required to secure future access for maintenance and upsizing purposes. Any pumping stations on site will require 15 metres clearance to the nearest habitable room.

Proposed amendment:

We propose the following additional criteria are added to part 3 of Policy SS3:

- i) Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.
- j) Future access to existing wastewater infrastructure must be ensured for maintenance and upsizing purposes.

If you have no more representations to add, please select this box

Your representation (5)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy SS11: Daedalus

Support or Object? Object

Please summarise why: Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from 300 dwellings proposed at this site. New and/or improved local sewerage infrastructure will therefore be required to serve the development, or separation of surface water which currently drains to the combined system.

This is not a constraint to development, provided Southern Water can 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.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the revised NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.

Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.

The need to protect existing on-site infrastructure also needs to be recognised in planning policies. Existing underground sewers and water mains are present on the site. This infrastructure must be allowed to continue to fulfil its function. It must not be damaged or built over. Appropriate easements will be required to secure future access for maintenance and upsizing purposes. Any pumping stations on site will require 15 metres clearance to the nearest habitable room.

Proposed amendment:

We propose the following additional criteria are added to part 2 of Policy SS11:

- i) Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.
- j) Future access to existing wastewater infrastructure must be ensured for maintenance and upsizing purposes.

If you have no more representations to add, please select this box

Your representation (6)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy A2: Housing  
Support or Object? Object

Please summarise why: Southern Water has identified that there is insufficient capacity in the local sewerage system to meet the anticipated demand from 60 dwellings proposed at the Gasworks Site, Mariners Way. New and/or improved local sewerage infrastructure will therefore be required to serve the development, or separation of surface water which currently drains to the combined system.

This is not a constraint to development, provided Southern Water can 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.

Southern Water has limited powers to prevent connections to the sewerage network, even when capacity is limited. Planning policies and planning conditions, therefore, play an important role in ensuring that development is coordinated with the provision of the necessary infrastructure.

Unless planning policies support delivery of the network reinforcements required to accommodate new development, there is a risk that it will not be delivered in tandem with development, leading to an unacceptable risk of foul water flooding to both new and existing residents. This situation would be contrary to paragraph 174(e) of the revised NPPF (2021), which requires the planning system to prevent both new and existing development from contributing to pollution.

Therefore, whilst a lack of capacity is not a fundamental constraint to development, planning policies should ensure that new or improved infrastructure will be provided in parallel with the development.

Proposed amendment:

We propose the following additional criteria are added to part 3 of Policy A2:

- e) Occupation of development will be phased to align with the delivery of sewerage infrastructure, in collaboration with the service provider.

If you have no more representations to add, please select this box

Your representation (7)

The draft Gosport Borough Local Plan 2038 contains a vision, objectives and policies with explanation text. Please use the boxes below to let us know what you are commenting on and whether you support or object along with your comments.

Paragraph/Policy Number: Policy LE13: Water Resources

Support or Object? Support

Please summarise why: Southern Water supports Policy LE13, in particular criterion 3 including sub sections a), b) and c). These will help to ensure that foul and surface water drainage provisions for new development are appropriately considered, and that Southern Water or other service providers have sufficient time to deliver any requisite network upgrades prior to occupation. This management of new connections to the existing network will help to avoid the risk of pollution that could arise if the network is overloaded as a result of new development.

We note however, that criterion 4 appears to repeat criterion 5 of Policy D7, and implies that adequate capacity in the sewerage network is a prerequisite to SuDS. Southern Water considers that all proposals, regardless of whether they incorporate sustainable drainage systems for surface water, should only be permitted to proceed if adequate sewerage and wastewater disposal facilities are available to serve the development.

Proposed amendment

We propose the following amendments to Policy LE13:

4. Development proposals which incorporate, where practical, the use of sustainable drainage systems will be permitted, provided that:

- a) Surface water drainage of adequate capacity and design is available; and
- b) Appropriate long-term management arrangements are made for their maintenance.

If you have no more representations to add, please select this box

Confirm