

Medway Council

Core Strategy Examination in Public

Further Written Evidence from Southern Water

Matter 2. Spatial vision

2a. Does the CS present a clear spatial vision for the Borough. Has it been positively prepared and will it deliver sustainable development in accordance with national and regional policy or identified needs?

Southern Water made representations to Medway's Publication Draft Core Strategy (August 2011) regarding the lack of any policies relating to proposals for new development in close proximity to existing wastewater treatment works. In our view this omission adversely affects the Core Strategy's ability to deliver sustainable development.

To set the context (but without repeating earlier representations) new development in close proximity to existing wastewater drainage and treatment facilities creates two problems: 1) the amenity of the new development could be adversely affected due to, for example, the odours that inevitably arise, and 2) it increases the risk to Southern Water of land-use conflict with new neighbours. This could have a negative impact on the company's ability to continue to provide the wastewater services required by both new and existing development.

Encroaching development in proximity to existing wastewater treatment works is a growing problem in Southern Water's operational area, which includes Kent, East and West Sussex, Hampshire and the Isle of Wight.

The lack of any policies in Medway's Core Strategy to prevent inappropriate proposals for new development close to existing wastewater treatment works means that the Core Strategy is not effective in delivering sustainable development in accordance with national policy. Paragraph 17 of the National Planning Policy Framework states that the planning system should seek to secure a good standard of amenity for future occupants of buildings, and paragraph 109 of the Framework says that the planning system should prevent new development from being put at unacceptable risk from pollution, including odour.

Proposed changes to overcome Southern Water's concerns

Please refer to Southern Water's original representation to the Publication Draft Core Strategy (August 2011). Inclusion of the following policy was proposed:

Development proposals in proximity to existing wastewater facilities will only be permitted if there is no unacceptable impact on the amenity of future occupants. The distance between the infrastructure and the development must be sufficient to allow adequate odour dispersion. This applies to Wastewater Treatment Works and major pumping stations.

Alternatively, a more generic policy to protect the amenity of new development might be appropriate.