

# Medway Council

## Core Strategy Examination in Public

### Further Written Evidence from Southern Water

#### Matter 5. Lodge Hill Strategic Allocation

*5c. Is the timetable for development realistic and achievable, particularly the necessary infrastructure provision and its impact on viability?*

Southern Water made a representation to Policy CS33 (Lodge Hill) in response to the Council's consultation on the Publication Draft Core Strategy (August 2011).

This representation is not repeated here, but in short Southern Water – as the incumbent water and sewerage undertaker – is concerned that the provision of strategic and local water and wastewater infrastructure for Lodge Hill has not been adequately addressed in the Core Strategy. This could impact on the timetable for the development.

It is not yet clear whether Southern Water will be selected as the service provider for Lodge Hill. It is our understanding that alternative service providers have investigated two options for wastewater services. If Southern Water is not selected as the service provider, the selected provider could: 1) use its statutory powers as a sewerage authority to requisition a connection through Southern Water to a wastewater treatment works owned by Southern Water, or 2) provide treatment facilities on site and discharge treated effluent to watercourses that pass through the development site. The second option would require environmental permits from the Environment Agency, who sets the wastewater treatment standards required.

The need for strategic and local water and wastewater infrastructure to serve Lodge Hill is a significant issue which in our opinion requires clear recognition in Policy CS33 to facilitate planning and delivery. A number of amendments were proposed by Southern Water in its representation, one of which the Council has taken on board as a minor amendment. However, the change proposed (insertion of the word “*utilities*”) is not sufficient to address this significant issue.

Paragraph 17 of the National Planning Policy Framework says that the planning system should proactively drive and support sustainable economic development to deliver homes, businesses, infrastructure and thriving local places. Paragraph 157 says that Local Plans should plan positively for the infrastructure, as well as the development, required in an area. In our view, these requirements have not been met in relation to Lodge Hill. Due to lack of clarity on who will be the service provider, we are not convinced that the water and wastewater infrastructure required to serve Lodge Hill can be provided in accordance with the timetable for development.

If development is permitted to progress before the necessary water and wastewater services are available, existing infrastructure could become overloaded and pollution events could occur. This would be contrary to paragraph 109 of the Framework, which requires the planning system to prevent new development from contributing to pollution.

#### **Proposed changes to overcome Southern Water's concerns**

Please refer to Southern Water's original representation to the Publication Draft Core Strategy (August 2011): Policy CS33: Lodge Hill.