

Mahil, Jaskarn

From: Planning Policy
Sent: 20 November 2007 13:24
To: Mahil, Jaskarn
Subject: FW: Gravesham Core Strategy Issues and Options - Southern Water's representation

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Taking Pride in Gravesham

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-----Original Message-----

From: Policy, Planning [mailto:]
Sent: 20 November 2007 12:31
To: Planning Policy
Subject: Gravesham Core Strategy Issues and Options - Southern Water's representation

Dear Sir/Madam

Thank you for the opportunity to comment on Gravesham's Core Strategy Issues and Options. Southern Water supplies water and provides wastewater services to the borough.

Please find attached our comments on the sections of the Core Strategy that are relevant to our function as statutory water and sewerage undertaker.

As part of Southern Water's investment programme for the period 2005-2010 improvements to the Northfleet wastewater treatment works were implemented, this included strategic improvements to the sewerage network across the area.

These improvements will provide additional wastewater treatment capacity to meet the demands from new development identified by the local authorities in this investment period.

With Kent Thameside being identified as an area to accommodate major growth, continued improvements will be required through the life of the Core Strategy. We are currently reviewing projections in our investment programme for the period 2010-2015, Gravesham's LDF will provide details of future growth and development proposals to help us ensure levels of service are maintained.

Southern Water is represented on the Thameside Water Cycle Study steering group. This will give us the chance to highlight any issues at the earliest opportunity but also to offer our experience in water supply and wastewater collection to ensure the needs of any Thameside development are considered and can be delivered.

I hope you find these comments helpful. If you would like to discuss our comments, or require further information, please do not hesitate to contact me.

22/11/07

Yours sincerely

David Sims

<<GraveshamCoreStrategyI&ONov07.doc>>

Waterwise Tip:

After preparing vegetables or salad, use the water left in the bowl for your garden.

For more tips on how to save water visit Southern Water's website at www.southernwater.co.uk

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Section 6 - Community Infrastructure

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We support the aim of this section as it recognises the need to support new and existing development with adequate infrastructure, and the provision of infrastructure will determine the scale and pace of the development.

Southern Water is committed to providing a high standard of water and wastewater services to existing customers, and meeting increased demand from growth and new development. Gravesham's Local Development Framework (LDF) will inform Southern Water's investment planning. We look to the Core Strategy to provide planning policies that facilitate provision of new and improved infrastructure.

Additional water supply and wastewater infrastructure will be required to meet the demand arising from development proposals, or to meet stricter quality standards in the treatment of water and wastewater. Delivery of infrastructure improvements needs to be supported by development plan policies.

Funding for investment to strategic infrastructure can normally be obtained through the Ofwat periodic review of prices, subject to their approval. However, if investment is required to local water or sewer networks, Ofwat takes the view that water and sewerage companies should seek to finance this work through contributions from developers. This reduces the financing burden on existing customers, who would otherwise have to pay through increases in general charges.

Assuming funding is successfully obtained through the periodic review, delivery of additional infrastructure will be dependent on obtaining necessary planning permissions from the relevant planning authority, and consents from the Environment Agency. This may result in additional lead-in time which would need to be taken into account in the timing of development.

The formal requisition procedures set out in the Water Industry Act 1991 provide a legal mechanism for developers to provide the necessary infrastructure to serve their site.

If development is allowed to proceed before the necessary infrastructure is in place to serve it, both new and existing customers may experience unsatisfactory levels of service, for example poor water pressure, flooding of property and environmental pollution. The council need to ensure that the necessary infrastructure is in place before new proposals are commenced.

Section 12 - Flood Risk

Page 150

Southern Water fully supports the Council's intention to promote mitigation measures if development is proposed in flood zone areas.

In periods of flooding, surface water can inundate the public sewerage system, thereby exceeding its capacity. The extra pressure can cause flows from the main sewer to surcharge up tributary sewers. As a result, properties may become flooded by foul water, even relatively remote from the flooded site. It is therefore important to minimise the risk of flooding.

It is important that new developments incorporate suitable arrangements for surface water drainage.

Sustainable Drainage Systems (SUDS) are often promoted in relation to surface water drainage. Southern Water is supportive of the objectives of SUDS. However, such systems require long term maintenance and rely on facilities which are not adoptable by sewerage undertakers. The developer should therefore ensure that arrangements exist for the long term maintenance of SUDS, so that their effectiveness is maintained in perpetuity. Good management will avoid flooding and subsequent inundation of the foul sewerage system.

We look to the Core Strategy to provide a policy on Sustainable Drainage.

Furthermore, the design of SUDS must be appropriate for the location. Factors that need to be considered include topography, run-off rates and ground conditions in relation to the size, type and density of development. SUDS are not suitable in areas with limited free drainage, for example in areas with clay soils.

These comments are consistent with PPG25, Appendix E, and The Interim Code of Practice for Sustainable Drainage System, published by the National SUDS Working Group, July 2004.

Where SUDS are not appropriate, alternative arrangements must be made. Surface water should not be drained to foul sewers, as this will increase the risk of flooding of the sewerage system.

Section 13 – Water Supply and Water Quality

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We support the council's approach on water consumption and conservation in residential and commercial development.

Efficient use of water is important at a time when the demand for water is rising both as a result of population growth and increased per capita consumption. Southern Water promotes efficient use of water as part of a twin-track approach of managing demand for water as well as providing additional resources. This strategy has been developed in collaboration with the Environment Agency and helps to minimise the volume of water abstracted from the environment.

We would welcome a policy in the Core Strategy to express the Council's intentions for standards of water efficiency.

Section 13 – Water Supply and Water Quality

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We support the key issue text on page 162 which states that it is important that future operational needs are not constrained as a result of encroachment of inappropriate development in the vicinity of the treatment plants. Protection of our sites will facilitate continued provision of water and wastewater services. Sensitive development adjacent to wastewater treatment works could result in complaints, as they are not ideal neighbours. This could ultimately threaten operation at the site.

The Core Strategy should therefore contain a policy to protect the amenity of residents, to support a more detailed policy in a subsequent Development Plan Document. This policy should permit development adjacent to wastewater treatment works only if the distance between the works and the development is sufficient to allow adequate odour dispersion.

Omission

Section 6 – Community Infrastructure

Construction of sewers to adoptable standards

Ensure that on-site and off-site sewers serving new developments of ten or more dwellings are constructed to adoptable standards (please refer to the current edition of *Sewers for Adoption*).

Omission

Section 13 – Water Supply and Water Quality

Quality and potential yield of water resources

Supply of water for public consumption relies on abstraction from reservoirs, rivers and groundwater. It is important that these resources are protected from contamination. Pollutants from built up areas could potentially be carried into rivers and groundwater by run-off or seepage. In addition, rapid run-off can reduce recharge of groundwater aquifers and therefore the availability of water for abstraction. Land-use planning decision can therefore significantly impact on water supply issues.