

Table 1

Consultee	Section	Comment	Response
<b>WSCC Planning and Transport</b>	GA4	This policy establishes opposition to the potential closure of the Woodgate level crossing if it does not have community support. Please note the level crossing closure may be a possibility if the A29 realignment is delivered, but no decision has been taken to close the level crossing. The Parish Council does not need to establish a position at this stage. It is suggested that this policy is removed.	See amended policy
	GA5	It is unclear as to why this policy includes the proposal to designate several roads in the parish as Quiet Lanes. Any proposal for this legal status would need to be supported by sufficient evidence. It is suggested that this part of the policy is removed; if it is to be retained then it could be stated in the 'Community Aspirations' section. It is suggested that the focus of policy GA5 is on ensuring safe and suitable road use for non-vehicular traffic.	Sufficient evidence will be provided
	LC8	Please note, there are no current plans to expand Aldingbourne Primary School.	Understood
	LC8.1	Please note, expansion of Eastergate Primary School has now been completed and the capacity is now for 30 pupils per year of age (total of 210).	Understood
	LC10	Given that the pre-submission Neighbourhood Plan for Aldingbourne includes the proposed allocation of a site for camping / touring caravans, it should be noted that site specific principles in the Neighbourhood Plan will need to be tested and refined through the Development Management process (through the provision of pre-application advice or at the planning application stage) or as part of a consultation for a Community Right to Build Order. Whilst the County Council supports the proactive approach undertaken to allocate sites in the Neighbourhood Plan, we are unable to comment on site specific principles at this stage. In considering site specific principles, please refer to the attached Development Management guidance.	Understood
<b>Oving PC</b>		No issues	
<b>Highways England</b>		No comments	
<b>Sussex Police</b>		No comments	

Southern Water	H6	<p>Whilst specific location and housing numbers are not determined within this policy, Southern Water considers that the policy should support the delivery of any new or improved wastewater infrastructure that may be required to serve new development. Without this provision, the Neighbourhood Plan does not meet the basic conditions required by the NPPF, namely to have regard to national policies and contribute to the achievement of sustainable development.</p> <p>Policies for residential development should recognise the need to connect to the local sewerage network at the nearest point of adequate capacity, to be consistent with paragraph 157 of the National Planning Policy Framework (NPPF). That paragraph requires positive planning for the development and infrastructure required to deliver sustainable development. Also one of the core planning principles in the NPPF is to 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'.</p> <p>If the necessary infrastructure is not delivered, the level of service could reduce, potentially leading to poor drainage or foul water flooding. This scenario would be contrary to paragraph 109 of the NPPF, which states that 'The planning system should contribute to and enhance the natural and local environment by...preventing both new and existing development from contributing to.....unacceptable risk from...pollution'.</p> <p>Proposed amendment</p> <p>Taking into account the aforementioned national policies, and to support Southern Water in expeditiously serving the future needs of your community, we propose the addition of the following criterion to Policy H6:</p> <p>vi: New residential development will be permitted only if sufficient capacity in the utility infrastructure network is either available, or can be provided in time to serve it (which may require agreements direct with service providers).</p>	Southern Water can add such a policy through the planning process
Southern Water	EH1	Built up area boundary (page 31)	

	<p>Southern Water understands the desire to protect land outside of the built up area boundary from development. However, we cannot support the current wording of policy EH1 where it states 'Proposals for development outside the built up area boundary that do not accord with development plan policies in respect of the control of the countryside, will be resisted'. Having made reference to Arun District Council's Local Plan (2003), Policy GEN3 Protection of the Countryside in its current form contains no provision to make allowance for essential utility infrastructure. This omission is rectified in the emerging Arun Local Plan published in October 2014, which states in policy C SP1 that development will be permitted if it is in accordance with other policies in the Plan, and policy INF SP1 states that: 'The Local Planning Authority will support proposals by service providers for the delivery of utility infrastructure and the improvement or development of locally and regionally important infrastructure where needed to serve existing or new development required through this Plan, or to secure long term supply, subject to other relevant policies.' However this plan is currently suspended pending further work following examination, and as such leaves a gap in policy for the provision of essential infrastructure. Paragraph 116 of the National Planning Policy Framework (NPPF) establishes that development should be permitted in designated areas in exceptional circumstances, where it can be demonstrated that the proposal is in the public interest. This approach is further supported by paragraph 118, which describes the principles that development should be permitted if the benefit outweighs any harm. Provision of wastewater infrastructure would be in the public interest, as it would potentially serve both existing and new development to meet stricter environment standards where appropriate. The National Planning Practice Guidance states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'.</p> <p>Therefore Policy EH1 of the Aldingbourne Parish Neighbourhood Development Plan does not meet the basic conditions necessary for a Neighbourhood Development Plan (NDP), namely: to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.</p> <p>Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</p> <p>Proposals for development outside of the built-up area boundary that do not accord with development plan policies in respect of control of the countryside, will be resisted, <u>except for essential utility infrastructure, where the benefit outweighs any harm, or it can be demonstrated there are no reasonable alternative sites available.</u></p>	<p>Southern Water has statutory powers to allow for this.</p>
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Southern Water	EH2	<p>Green Infrastructure and Ecosystem Services (page 31)</p> <p>Southern Water understands the desire to protect Green Infrastructure Corridors, woodland and orchard. However, we can not support the current wording of policy EH2 as it could create a barrier to statutory utility providers, such as Southern Water, from delivering their essential infrastructure required to serve existing and planned development.</p> <p>Policy EH2 of the Aldingbourne Parish Neighbourhood Development Plan does not meet the basic conditions necessary for a Neighbourhood Development Plan (NDP), namely: to be in general conformity with the strategic policies contained in the development plan for the area of the authority, to have regard to national policies and advice contained in guidance issued by the Secretary of State and contribute to the achievement of sustainable development.</p> <p>Paragraph 116 of the National Planning Policy Framework (NPPF) establishes that development should be permitted in designated areas in exceptional circumstances, where it can be demonstrated that the proposal is in the public interest. This approach is further supported by paragraph 118, which describes the principles that development should be permitted if the benefit outweighs any harm. Provision of wastewater infrastructure would be in the public interest, as it would potentially serve both existing and new development to meet stricter environment standards where appropriate. The National Planning Practice Guidance states that 'it will be important to recognise that water and wastewater infrastructure sometimes has locational needs (and often consists of engineering works rather than new buildings) which mean otherwise protected areas may exceptionally have to be considered'. Our proposed amendment would accordingly be in line with the NPPF and NPPG and so enable the basic conditions of a Neighbourhood Plan to be met (new text is underlined):</p> <p><u>New development within the Biodiversity Corridors or identified on Map A will not be supported unless it is for essential utility infrastructure, where the benefit outweighs any harm, or it can be demonstrated there are no reasonable alternative sites available.</u></p>	Southern Water has statutory powers to allow for this.
Southern Water	EH9	<p>We note that Policy EH9 proposes that the local planning authority consider the designation of one new Conservation Area and two Areas of Special Character within the Parish. Whilst Southern Water would not object to new designations in principle, we would be keen to ensure that any policy protecting these areas is not unduly restrictive to the provision of essential utility infrastructure.</p> <p>We further note that this policy has not been deleted in line with the recommendation of the Examiner in her report dated October 2015, and as such will not comment further at this stage.</p>	Southern Water has statutory powers to allow for this.

<p><b>Southern Water</b></p>	<p>Omission of policy</p>	<p>Provision of additional wastewater infrastructure</p> <p>As our previous representations identified, we can find no policies to support the delivery of new or improved infrastructure, which may be required to serve new development. Without this policy provision, the NDP does not meet the basic conditions necessary for NDP, namely to have regard to national policies and contribute to the achievement of sustainable development.</p> <p>Southern Water is the statutory sewerage undertaker providing wastewater services for Aldingbourne. Southern Water has a statutory duty to serve new development, and is committed to ensuring the right wastewater infrastructure in the right place at the right time in collaboration with developers, the parish council and the planning authority. Once 'made', Aldingbourne NDP and the adopted Arun Local Plan, will inform Southern Water's investment planning. Adoption provides the planning certainty required to support investment proposals to Ofwat, the water industry's economic regulator. Investment proposals are prepared every five years through the price review process. Last year's price determination will fund the investment programme in the period to 2020. There will be another price review in 2019, covering the investment period 2020 to 2025.</p> <p>Over the life of the NDP it may be that we need to provide new or improved infrastructure. Page 8 of the National Policy Statement for Wastewater states that '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. The Government is taking measures to reduce the demand for new waste water infrastructure in England...However, there will still be a need for new waste water infrastructure to complement these approaches and ensure that the natural and man-made systems are able to function effectively together to deliver a wide range of ecosystem services and other benefits to society'.</p> <p>Accordingly, we seek policy provision to support new or improved utility infrastructure. Such policy provision would also be in line with the main intention of the National Planning Policy Framework (NPPF) to achieve sustainable development. For example, one of the core planning principles contained in paragraph 17 of the NPPF is to 'Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs'. Also paragraph 157 of the NPPF requires positive planning for development and infrastructure required in an area.</p> <p>Arun District Council's strategic policies recognise the importance of supporting utility infrastructure proposals. The publication version of the Arun Local Plan published in October 2014 says, in policy INF SP1, that: 'The Local Planning Authority will support proposals by service providers for the delivery of utility infrastructure and the improvement or development of locally and regionally important infrastructure where needed to serve existing or new development required through this Plan, or to secure long term supply, subject to other relevant policies.' However this plan is currently suspended pending further work following examination, and as such leaves a gap in policy for the provision of essential infrastructure.</p> <p>The following proposed policy provision supporting the delivery of utility infrastructure, would be</p>	<p>Southern Water has statutory powers to allow for this.</p>
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Southern Water	3.4.9	<p>Flood Risk and Drainage (page 16)</p> <p>We are unable to support this section of the NDP because it does not meet the basic conditions necessary for NDP, namely to contribute to the achievement of sustainable development.</p> <p>A joint project led by Lead Local Flood Authority West Sussex County Council and including Arun District Council, the Environment Agency and Southern Water has recently been carried out in the Lidsey catchment to formulate a Surface Water Management Plan (SWMP). It would be helpful if this was reflected in Aldingbourne's Neighbourhood Plan to contribute to the achievement of sustainable development.</p> <p>Paragraph f on page 16 of the Aldingbourne NDP describes 'deficiencies in the public and private sewer network'. The main issue is that during periods of significant rainfall the functioning of the sewerage system in the Lidsey catchment is adversely affected by surface water and groundwater entering the system. The system is not designed to accept this water which should be dealt with by appropriate land drainage. Southern Water is not responsible for land drainage but as described above we have been working with the Lead Local Flood Authority (West Sussex County Council) in the development of a SWMP. The SWMP has been published and identifies actions that are currently being progressed by a number of Flood Risk Management Authorities, including West Sussex County Council, Arun District Council, the Environment Agency and Southern Water.</p> <p>To reflect this, we suggest an additional paragraph for section 3.4.9 as follows:</p> <p><u>A Surface Water Management Plan has been carried out in the catchment, and recommendations have been made to improve the situation through partnership working involving all the relevant Flood Risk Management Authorities (West Sussex County Council, Arun District Council, the Environment Agency, Southern Water) and local groups.</u></p> <p>In the same vein, we suggest that paragraphs (f) and (g) of section 3.4.9 are amended to accurately reflect the situation.</p> <p>We propose the following amendments, new text is underlined, deleted text is struck through.</p> <ul style="list-style-type: none"> <li>· f) It is acknowledged that the Lidsey catchment is adversely affected following periods of prolonged rainfall due to <u>inundation of</u> <del>deficiencies in</del> the public and private sewer network and land drainage systems. The Barnham and Eastergate/ Westergate trunk sewers, transferring flow to the LWWTW are <u>not designed to act as a land drainage system and become</u> extensively overloaded in wet weather causing flooding and pollution problems. The overloading of the sewer system is considered to be caused mainly through ground water infiltration and inundation within the catchment.</li> <li>· g) The resultant effects of <u>this inundation of</u> <del>these deficiencies</del> within the public and private sewer network and the inability <u>of the network and the land drainage system</u> to cope with peak rainfall events are clearly recorded in the recent flooding events of June 2012 and December 2012. In particular the flood events of June 2012 were of such magnitude as to attract media attention at national level and the January/ February 2014 events caused wide spread disruption to traffic and damage to homes</li> </ul>	Agreed
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<b>Luken Beck</b>		Attached.	