Wealden District Council
(incorporating part of the South Downs National Park)

Core Strategy
Examination in Public

Further Written Evidence from Southern Water

Matter 15. Infrastructure (WCS7, WCS13)

a) *Have the critical infrastructure requirements in the Infrastructure Delivery Plan been justified by the evidence base? What would be the consequences for the strategy if any of the critical infrastructure was not delivered? Is there sufficient commitment at this stage from the relevant organisations responsible for delivery?*

Southern Water has worked closely with Wealden District Council to identify the wastewater infrastructure required to serve the development proposed in the Core Strategy.

A study was commissioned in 2006 to investigate capacity at wastewater treatment works and the level of development that would trigger the need for investment. The study was updated on numerous occasions throughout the preparation of the Core Strategy. The capacity assessments informed Southern Water's investment planning for the periodic review of prices in 2009, and a number of the infrastructure schemes identified in the Infrastructure Delivery Plan are funded and scheduled for completion by 2015. Southern Water will deliver these schemes unless there are exceptional circumstances that prevent delivery. No exceptional circumstances are currently known.

Schemes that are deemed critical based on the Infrastructure Delivery Plan (Background Paper 11 which incorporates proposed changes), but have not yet been allocated funding, are shown in table 1 overleaf.

With regard to items 1 and 2 of table 1, Southern Water will seek funding in the next periodic review of prices in 2014, provided Wealden's adopted Core Strategy demonstrates the need. Ofwat generally agrees to fund investment to strategic infrastructure (such as wastewater treatment works) in order to meet demand from new development. Southern Water therefore assesses the risk of non-delivery as low if the need for the investment is demonstrated through the Core Strategy and by progress of development.

With regard to items 3 and 4 of table 1, odour mitigation might permit development adjacent to wastewater treatment works which would otherwise be unacceptable on the grounds of exposure to unpleasant

odours. However, Ofwat would not fund the infrastructure within the price setting mechanism under these circumstances. Mitigation measures would therefore have to be funded by the development itself rather than by Southern Water.

Southern Water has no powers to prevent development adjacent to wastewater treatment works, and would rely on the planning authority to impose appropriate planning conditions in order to secure funding for the required odour mitigation measures. If appropriate infrastructure is not delivered, the amenity of residents would be adversely affected due to unacceptable exposure to unpleasant odours. We would ask the Inspector to clarify with Wealden District Council whether they are clear on their role in ensuring odour mitigation measures are delivered.

Ref	Scheme Name	Risk and Contingency Measures
1	Hooe WWTW	Scheme is deemed critical to the development of up to 50 dwellings, but risk is low….
2	Tunbridge Wells South WWTW	Scheme is deemed critical to development of 120 homes, as a contingency if development in south Wealden is unable to be delivered due to infrastructure constraints. Low risk….
3	Odour mitigation Uckfield WWTW	Infrastructure required if development will be affected by potential odour….
4	Odour mitigation Hailsham North WWTW	Infrastructure required if development will be affected by potential odour….
5	Sewerage infrastructure	Infrastructure may be required, particularly at green field locations to connect development with mains sewerage.

Table 1. Extract from the Infrastructure Delivery Plan (Background Paper 11 incorporating proposed changes) - schemes that are deemed critical, but have not yet been allocated funding.

With regard to item 5, Southern Water is expected by Ofwat to recover the costs of local sewerage infrastructure required to serve new development. This approach ensures that the infrastructure is paid for by those who directly benefit from it, and protects existing customers who would otherwise have to pay through increased general charges.

Southern Water has limited powers to ensure that necessary local sewerage infrastructure is delivered by the development, and would therefore rely on the planning authority to impose appropriate planning conditions. If the necessary infrastructure is not delivered, both new and

existing customers would experience unsatisfactory levels of service, for example poor drainage or foul water flooding. We would ask the Inspector to clarify with Wealden District Council whether they are clear on their role in ensuring local sewerage infrastructure is delivered to development sites (strategic, non-strategic and windfall).

We note that the alternative discharge location to provide additional wastewater treatment capacity is not identified as critical to the Core Strategy in the Infrastructure Delivery Plan, and that the Environment Agency has proposed that the scheme be deleted.

b) *Is it clear what infrastructure is required in the first 5 years of the plan and who is going to fund and provide it?*

Southern Water is clear on the wastewater treatment infrastructure required in the first 5 years. Local sewerage infrastructure is less clear because it will need to be provided on a site-by-site basis as sites come forward for development. As explained above, local sewerage infrastructure will need to be provided by the development, facilitated by planning conditions. This applies to all development sites – strategic, non-strategic and windfall.