

Catherine Adamson obo Southern Water

Please state which part(s) of the Southborough and High Brooms Neighbourhood Development Plan (NDP) (or supporting documents) this response relates to.

Policy SHB10 Local Green Spaces

Please enter your comments on the Southborough and High Brooms NDP (or supporting documents) in the space below. It would be helpful if you could state which document, section or paragraph you are referring to in Question 1 above.

Further to our representations at the Regulation 14 stage, whilst we note that policy SHB1, the Location of Development, allows for 'necessary utilities infrastructure where no reasonable alternative location is available', policy SHB10 does not make this clear for local green spaces. Nor does policy SHB10 make clear that development proposals within the designated local green spaces will be consistent with national policy for Green Belt. We therefore recommend adding the following wording to policy SHB10: Development proposals within the designated local green spaces will be consistent with national policy for Green Belt. Further explanation and recommendations: Southern Water infrastructure runs beneath a number of the sites proposed for designation, and at times this infrastructure will require essential maintenance and/or reinforcement/replacement. For example: LGS4 Corner of Blackthorn Avenue and Juniper Close Foul and surface water sewers run through the middle of the site from north to east. LGS5 Open space adjacent to TCHG flats and car park A foul sewer runs through the south edge of the site. LGS6 Blackthorn Avenue entrance space A foul sewer runs through the south edge of the site. LGS9 Barnett's Wood Allotments Two foul sewers run across the site west to east. LGS17 Southborough Hockey Pitch A foul sewer runs through the site from west to south. LGS20 Pennington Place off Pennington Road A surface water sewer runs through the site from south to northeast. LGS22 Garlinge Road A surface water sewer runs through the site, from south to west. LGS25 Harland Way tree strip A foul sewer runs through the site from west to east. LGS26 The Crescent, Darnley Drive A surface water sewer runs through the site from west to east. LGS27 Camp Field A foul sewer runs through the site from northwest to northeast. LGS28 Doctor's Meadow A foul sewer runs through the southern site boundary LGS29 Woodland Area, near Holden Pond Two surface water sewers run northwest through the site LGS30 Holden Pond A surface water sewer runs through the northern part of the site, and a foul sewer runs through the southern segment. The National Planning Policy Framework (NPPF) (December 2024) sets out the intention to protect the countryside and prevent settlement coalescence through its Green Belt policies, for which it establishes: • The intention in paragraph 153 of ruling out inappropriate development 'except in very special circumstances' that exist if the potential harm of a development proposal is clearly outweighed by other considerations. • In paragraph 154 that 'certain other forms of development are also not inappropriate' including 'engineering operations'. • Also in paragraph 108 of the NPPF that Local Green Space policies should be consistent with those for Green Belts. Southern Water considers that should the need arise, special circumstances exist in relation to the provision of essential water or wastewater infrastructure (e.g a new pumping station) required to serve new and existing customers. This is because there can be limited options available with regard to location, as the infrastructure would need to connect into existing networks. The draft National Planning Practice Guidance recognises this scenario and states that 'it is important to recognise that water and wastewater infrastructure can have specific locational needs (and often consists

of engineering works rather than new buildings). This means exceptionally otherwise protected areas may have to be considered, where this is consistent with their designation.'

If the appointed Examiner determines that a hearing is necessary, do you wish to attend?

No

Would you like to be notified of the Council's decision regarding the outcome of the Southborough and High Brooms NDP under Regulation 19?

Yes