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Executive Leader of the Council
Councillor Seán D T Woodward

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Rt Hon David Miliband MP
Secretary of State Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

30 March 2007

Dear Mr Miliband

SEWAGE INFRASTRUCTURE AND THE PLANNING PROCESS

I am writing on behalf of the Partnership for Urban South Hampshire (PUSH). PUSH is, as I am sure you will recall, a voluntary working partnership of eleven local authorities stretching from the New Forest to East Hampshire. It was formed in 2003 in response to evidence that the overall economic performance of the sub region was significantly lower than the remainder of South East England.

PUSH consists of the following local authorities: East Hampshire District Council, Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Hampshire County Council, Havant Borough Council, New Forest District Council, Portsmouth City Council, Southampton City Council, Test Valley Borough Council and Winchester City Council. These authorities have been working together to develop a Vision for Urban South Hampshire and have submitted a draft Sub Regional Spatial Strategy as part of the South East Plan.

Representatives of PUSH recently met representatives of Southern Water to discuss urban drainage issues in South Hampshire and following this meeting I would like to draw the following matters to your attention.

There is a fundamental problem in coordinating the decisions that need to be made as part of the planning process in terms of the scale and location of development and the timetable for funding of new infrastructure through Ofwat. The Ofwat funding programme only looks forward 5 years and beyond this time period there can be no certainty as to Southern Water's investment programme. Southern Water need to be certain that development will take place before it can allocate funds to develop infrastructure. When allocating development to broad locations as part of the strategic planning process, the planning authorities needs to be certain that the requisite infrastructure can and will be provided. The planning authorities will be looking ahead over a 20 year time frame and there are

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difficulties in reconciling the 2 different timetables. The 5 year funding periods are too short to provide any certainty for the planning process and the timetables for review of funding and strategic planning are not linked. For example, the planning process is identifying growth in South Hampshire, but if the necessary funding to increase the capacity to deal with the waste water from this development is not provided then the development will not be able to go ahead and the aims of the South East Plan and South Hampshire Sub-regional Strategy will not be realised. This may not become apparent until several years into when the strategy should have been started to be implemented.

The planning system will only ever formally identify or allocate to sites a certain proportion of development. Historically, a large proportion of development has come from unidentified or windfall sites. This is predicted to continue. However, this causes the sewerage undertakers problems, as there is uncertainty about the precise scale of development in specific locations.

The narrow definition of a sewer also causes problems. Sustainable urban drainage systems often contain elements that deal with the storage or movement of waste water. If these do not fall within the very tight legal definition of a sewer, the waste water undertaker cannot adopt them. This is irrational as the statutory undertaker has a clear and logical interest in being able to maintain the infrastructure and ensure that it is fit for the purpose for which it was designed. It is also unfortunate in that measures that do not meet the legal definition for adoption (e.g. water meadows or balancing ponds) are often more sustainable than traditional measures but there is an incentive not to have them because they cannot be adopted.

I hope you will give consideration to the matters raised in this letter and look forward to your response.

Yours sincerely

A handwritten signature in black ink that reads "Seán Woodward". The signature is written in a cursive style with a long, sweeping underline.

Councillor Seán Woodward
Chairman of the Partnership for Urban South Hampshire