

## Southern Water Draft Water Resources Management Plan 2024 Consultation

### Joint Response from Chichester District Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, West Sussex County Council, South Downs National Park Authority

Date: 20 February 2023

This document is the joint response to the Southern Water WRMP consultation prepared by the Local Planning Authorities affected by the Water Neutrality Issue in the Sussex North Water Resource Zone.

Individual authorities may make additional comments specific to their area in a separate response.

<b>Question 1 Regional Plans</b>
Do you agree that our WRMP should reflect the best value regional plan, so we are aligned with our neighbouring water companies?
YES
Please Explain Your Answer
It is imperative that the water resources both nationally and in the SE Region should be managed holistically. Therefore we agree that Southern Water's WRMP should align with the WRSE strategy as a whole.
<b>Question 2 Increasing resilience to drought</b>
To protect the environment, we currently have a lower level of service in our Central area, covering West Sussex and Brighton and Hove, compared to our target. This means up to 2027 there is an increased likelihood of needing to impose restrictions on water use. We have set out our plan to address this gap.
Do you have any comments or concerns about this level of service in our Central area and our plan to address it?
YES
Please Explain Your Answer
The Water Neutrality issue is having a major impact on all of the planning authorities in the Sussex North Water Resource Zone. Whilst there are other recognised environmental issues affecting your plan, this issue is currently halting much development across the affected authorities. We think that this issue should receive greater recognition from Southern Water in this plan, as well as their current operations in the area – we feel that Southern Water should be doing all they can in the immediate-term to help address the issues facing the affected local authorities.
We welcome the scheduling of the Littlehampton recycling plan and the importing of water from nearby suppliers early in the plan (2025-2035). This will contribute to addressing this issue which is delaying Local Plans, restricting economic development and holding up much needed affordable housing in the local authority areas supplied by the SNWRZ.
<b>Question 3 Drought orders</b>
We propose to stop using drought orders and permits that allow us to continue abstracting from the environment after 2040, unless we experience a severe drought. This means we'll need to develop new water supplies to replace them.
Do you agree with this approach and the timescale we are proposing to deliver it?
NO
Please Explain Your Answer
Whilst we understand that there are significant challenges in developing alternative water sources within the region, the current timescales mean that water will continue to be abstracted from the environment over the next 17 years. It is noted that most areas supplied by Southern Water are heavily dependent on groundwater extraction. The impact on the Sussex North Water Resource zone area has already demonstrated that the

environment is already threatened from such activities. It is therefore considered that further investment is required to fast track and implement this work.
<b>Question 4 Planning for an uncertain future</b>
We have considered a range of future scenarios in our adaptive planning approach.
Are there any other future scenarios that you think we should consider?
NO
Please Explain Your Answer
It is considered that the three scenarios post 2030 and the nine scenarios post 2035 cover a wide enough range of variables at this stage in the process. Taking account of the overall 50 year timescale it is the best that can be reasonably predicted. However this will need to be kept under review and updated to take account of new data and trends as soon as it becomes available. It is essential that the predictions are based on the most realistic position of growth and are flexible over the period to allow for increases in development levels, particularly given the requirement for Local Plans to be reviewed every five years and be based on a “standard method” for calculating housing need that it includes uplifts for affordability. The WRMP24 should be adaptable between scenarios rather than become fixed to a particular scenario approach. We are generally supportive of the flexible approach needed to adapt to changing circumstances.
<b>Question 5 Efficient use of water and minimal wastage across society</b>
Do you support our plan to at least halve leakage by 2050?
YES and NO
Please Explain Your Answer
The Councils are supportive of the requirement to ensure that water is used efficiently and that leakage reduction takes place given that leakage reduction will provide the single biggest benefit in terms of water supply security especially in the short term. It is considered that efforts should be made to bring forward effective leakage reduction as soon as possible and prior to 2050, given that this is nearly 30 years into the future. In our view operations to fix the leaks should be front loaded in the plan between 2023 and 2027. Without sufficient leakage reduction early in the plan period, there is a risk that the development of new water sources could be ineffectual because of continued (or greater) losses through leakage.
<b>Question 6 Water Usage Target</b>
Do you support us achieving our WRMP target of reducing average personal daily use from 131 litres per person per day to a) 109 litres by 2040 or b) should we retain our more ambitious target of 100 litres per person per day by 2040?
NEITHER
Please Explain Your Answer
Overall, the authorities in the Sussex North Water Resource Zone area are supportive of Southern Water’s aims to reduce average personal use below the current level of 131 litres per person per day. Given the impact of water neutrality, we are however aware that there are clear technological innovations which are relatively simple that would allow much lower levels of water efficiency to be achieved. It is this which has informed the proposals for our emerging local plans to set a target of 85 litres per person per day. These targets are considered realistically achievable and include the retrofitting existing housing stock. The Councils are therefore of the view that whilst it may not be possible to achieve 85 litres in all properties, neither target above is sufficiently ambitious. As a minimum however, the more ambitious target of 100 litres per day should be retained. There is also need to consider water usage arising from non-residential development. Our emerging Local Plans set a target for non-residential development to require an advanced BREEAM standard to support water neutrality (i.e. new buildings must achieve 3 credits within the water (WAT01 Water Consumption) issue category).
<b>Question 7 Government Interventions</b>
Do you support additional proposed government interventions and the timing of their introduction?
NO
Please Explain Your Answer
As for the role of Government policies it is agreed that labelling of water-using products by 2024 is realistic. However the minimum standards for water using products by 2045 is inadequate and we agree that this should

be brought forward to at least 2030 as suggested in the draft WRSE regional plan. Given that 2024 is realistic to start introducing this water labelling, there is no reason for this not to start to be introduced through changes to the building regulations. This will assist local authorities affected by water neutrality (the list is expected to grow) to deliver development, and would additionally assist local residents in making good purchasing choices which will also lower their operational costs (as the water bills will come down). This will assist with the cost of living. Waiting until 2040 or 2060 is entirely unacceptable. We suggest all stakeholders lobby the government to accelerate the introduction of improved water efficiency standards which would increase the available supply sooner. We would be happy to work with Southern Water and other water companies in this respect.

#### **Question 8 Temporary restrictions**

Our plan continues to rely upon temporary restrictions on water use to help lower demand during droughts to avoid further investment in new supplies.

Do you agree with our approach to continue using temporary water restrictions during droughts?

YES

Please Explain Your Answer

The forecast accelerating rate of climate change will make these restrictions essential rather than optional in the short term so it is prudent to include them in the plan. As outlined in previous replies, further work and investment in new water supplies need to be introduced to minimise the reliance on such restrictions and as soon as possible.

#### **Question 9 New water sources to provide resilient and sustainable supplies**

A new strategic reservoir is an integral part of the regional best value plan for the South East. Do you have any comments on the size of the new reservoir?

NOT AT THIS STAGE

Please Explain Your Answer

We do not have any detailed comments on this matter, but would wish to be kept informed of the proposals and implications this may have across the south east as a whole.

#### **Question 10 Strategic Reservoir and Havant Thicket**

Does your position change if the size of that reservoir (which will supply the transfer into Hampshire) impacts on the size of water recycling plant needed at Havant Thicket? (See section seven in our technical document for more information)

UNKNOWN

Please Explain Your Answer

It is unclear how the two projects are connected as the Havant Thicket Reservoir and Havant Water Recycling scheme are due to come online 2029-30 whereas the SESRO is not due until 2040, a gap of ten years.

#### **Question 11 Pipelines**

Do you support our strategy to develop new pipelines that will transfer water into our supply area, that is made available through the development of new strategic water sources in other water companies' supply areas?

YES

Please Explain Your Answer

The authorities support in principle the potential for new pipelines from outside the Southern Water area. However, we are not yet convinced that this will be a mechanism which can effectively deliver solutions, particularly early in the strategy. Consideration must be given to the potential environmental impact of any particular routes. We are aware that Pipelines of this length may require EIAs or need to be considered through the NSIP process. Furthermore, it is our understanding that at the current time, this would require the water to be chemically compatible across the region in order to transfer from one water company's WTWs to another company's delivery pipeline, and we are unclear as to whether this is currently technologically feasible. Also the transfers would have to be enabled fairly quickly in response to demand. This would require digitisation and monitoring of the regional network to be effective. Different water companies in the region are at different stages of network monitoring so this will need to be evened up.

We are also concerned that the water resource issues facing Southern Water will also be felt by other water companies, given the high levels of growth across the whole of the SE. These water companies may therefore

not be able to transfer water (or as much as is planned) to SW. Given this, we are somewhat concerned at the proposed heavy reliance in the SW Plan of transfers from other water companies throughout the plan period.

#### **Question 12 Water Recycling**

Do you agree that water recycling has a role to play in securing water supplies for the future?

YES

Please Explain Your Answer

We agree that water recycling opportunities should be explored more. As technology evolves this could deliver more water than drought orders and permits. We are generally supportive of alternative water supply options regardless of the technology used. However, in the short term the Littlehampton water recycling scheme early in the plan (2025-2035) uses existing assets so should be “planning neutral”. Therefore we welcome the plan to supply the water supply works near Pulborough as it will have a material impact in achieving Water Neutrality in the Sussex North WRZ.

#### **Question 13 Desalination Plant**

Our plan has shown we could need a desalination plant in Sussex by 2040 and that more could be needed in the future if we experience high population growth, and we need to reduce how much water we take from sensitive sources.

Do you think we should use desalination to provide additional water supplies?

This should be investigated

Please Explain Your Answer

It is considered that desalination may have potential to provide additional water supply in times of water stress and should be investigated. However, it is important that water savings and reduction measures such as leakage reduction are prioritised. It is also understood such technologies are highly energy intensive, and may have other wider ecological impacts that need to be mitigated. If these plants were powered by renewable or other non CO2 emitting energy sources then they would be more able to be supported. Further information is required to understand the costs, feasibility and timescales to introduce such a scheme.

#### **Question 14 Blackstone Reservoir**

Our plan has identified the need for a new reservoir to store water in West Sussex.

Do you think we should investigate this further to establish whether it could provide a new source for the area?

YES

Please Explain Your Answer

Given the need to identify a range of alternative water sources, it is considered that all realistic options to provide an alternative water supply for the area should be investigated. However, these proposals have raised questions locally with residents who may potentially be affected by these proposals. At this stage it is difficult to provide effective comment and feedback as the precise location and timescales for the implementation of the scheme are not fully understood. According to the WRSE regional plan this proposed reservoir is not scheduled to come online until 2046. However we suggest the initial hydrogeological groundwork be undertaken to establish if the reservoir is actually feasible. This initial work should be done sooner in the plan (2025-2035) and if it is not deliverable then resources could then be spent investigating other sources. As local planning authorities it is important that we have early sight of any reservoir location in order to factor this in to our business activities including local plan making as appropriate. We therefore request that we are kept informed on the progress and thinking with regard to this reservoir.

#### **Question 15 Water Recycling**

Do you think we should look at water recycling options where water is stored in reservoirs, lakes or other waterbodies as well as those where it is released back into nearby rivers and abstracted again?

YES

Please Explain Your Answer

We agree that all water recycling opportunities should be explored more. As technology evolves this could deliver more water than drought orders and permits.

#### **Question 16 Additional Comments**

Do you have any additional comments on any of the schemes we have proposed in our draft plan?

NO
Please Explain Your Answer
We wish to be kept informed of developments as the plan progresses.
<b>Question 17 A network that can move water around the region</b>
Do you agree that we should develop our pipeline network so we can move more water between our supply areas and share supplies with our neighbouring water companies?
YES
Please Explain Your Answer
We support the plan for new pipelines within the Southern Water area in principle, however shared supplies would have to overcome the issues raised in the answer to Question 11 above. Assuming these issues are resolved we support this proposal.
<b>Question 18 Catchment and nature-based solutions</b>
Do you support our ambition to proactively use catchment and nature-based solutions where we can, to help improve the quality of the water sources we rely upon so we can abstract water sustainably and deliver wider environmental benefits?
YES
Please Explain Your Answer
We support the use of nature-based solutions in principle as they may have a useful role alongside other water supply solutions. However, the extent to which NBS can affect the region's water supply and the wider impacts are unknown. The environmental and additional benefits may be more immediately obvious but unless they can deliver an appreciable extra supply they may have a limited role within a wider suite of measures. Furthermore, land in the south east is at a premium so the number of sites for NBS may be limited. However, there may be opportunities to align with Local Nature Recovery Strategies. For example, water courses are some of the key corridors in Horsham District's emerging draft Nature Recovery Network and appropriate management of these, which could include NBS, may preserve the water supply to key environmental sites freeing up water from other sources for other uses. There may also be opportunities for land use changes away from water intensive uses and for schemes to contribute to Biodiversity Net Gain for developments off site.
<b>Question 19 Cost of delivery</b>
Do you think that others who benefit from a healthy water environment should contribute to the cost of delivering these solutions?
UNSURE
Please Explain Your Answer
It is not specified in what circumstances and by what mechanism this contribution would be levied. All homes and businesses use water and pay water bills and everybody benefits directly or indirectly from a healthy water environment. Therefore it is not clear who these "others" would be. However it is considered that given the significant levels of investment which are likely to be required to ensure safe, effective and sustainable water resources across the UK as a whole, it is likely that additional levels of national or government investment may be required.
<b>Question 20 Similar work</b>
Do you or your organisation have similar work planned in our catchments?
Do you have any views on how best we can co-ordinate this work so we achieve the most benefits?
N/A
Please Explain Your Answer
The responding NW Sussex authorities do not operate beyond their administrative areas. However it is understood that water neutrality is likely to become more common place, and as the first area to have this requirement placed upon us are happy to share best practice and our experience with others who may need to pursue such an approach.
<b>Question 21 How we'll provide your water</b>
Our draft WRMP includes options that will reduce demand and a mix of different schemes to produce extra water supplies.

Do you think our plan strikes the right balance between demand and supply solutions?
YES
Please Explain Your Answer
In principle we agree that the plan strikes the right balance between demand and supply solutions – however this will need to be informed by further detail as schemes are developed in the future.
<b>About You</b>
Is this a response on behalf of an organisation?
YES
If yes, which organisation?
Horsham District Council, Crawley Borough Council, Chichester District Council, Mid Sussex District Council, West Sussex County Council, South Downs National Park Authority
Does Southern Water supply your water?
YES
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