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Your Ref:
Our Ref: SEWWRMP

Date: 20th February 2023

Submitted Online

Dear Sir / Madam,

South East Water – Consultation on the draft Water Resources Management Plan

Thank you for the opportunity to comment on the emerging Water Resources Management Plan. Mid Sussex District Council supports the co-ordinated and collaborative approach to securing future water supplies and supports the Key Priorities within the WRMP, particularly those related to:

- Reducing leakage
- Reducing reliance on abstraction, to support habitats
- Reducing demand for water through efficiency initiatives
- Reducing household water use

However, the Council has the following detailed comments.

Increasing Resilience of Supply

Mid Sussex residents are concerned that there will be insufficient water supply to serve current and future planned growth. Whilst not directly connected, this concern has been exacerbated by recent weather-related operational incidents which have led to residents being without water supply for a considerable period.

It is therefore vital that reassurance can be provided to residents that there will be sufficient water supply to cater for existing and future demand. The Water Resource Management Plan must be fully conscious of the levels and locations of planned growth in Local Plans and plan for them accordingly.

Therefore, although the Council notes that South East Water was fully engaged during the production of the District Plan and Site Allocations DPD (and were committed to ensuring sufficient water supply to serve planned growth) it would be helpful to remind you of the levels of future planned growth.

The National Planning Policy Framework (NPPF) states that the planning system should be plan-led. To this end, the District Council places great importance on ensuring it has an up-to-date Local Plan to plan for future housing, employment and infrastructure needs. This provides greater certainty for infrastructure providers by setting out where, when and how much development will take place and therefore assist with planning for the infrastructure required to support such development.

Mid Sussex District Council adopted its current District Plan in 2018, covering the period to 2031. This identified a housing requirement of 876 homes per annum until 2023/24, rising to 1,090 for the rest of the plan period. It contained strategic allocations to meet most of this housing need, with a Site Allocations Development Plan Document (DPD) adopted in June

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2022 to allocate further sites to meet the remaining housing need. Overall, the Council has sufficient commitments (allocations and planning permissions) to demonstrate that it can meet its housing need in full – planning for a total of 17,297 dwellings to 2031.

The District Council has now embarked on a review of its District Plan. This will plan for any additional growth identified, noting that housing need has increased since the current District Plan was adopted. The Government’s Standard Methodology identifies a starting point of 1,119 dwellings per annum for the district.

The draft District Plan 2021 – 2039 was published for public consultation in November 2022, with adoption anticipated in 2024. The draft District Plan plans for a total of 20,444 dwellings for the period to 2039.

The Council has reviewed the background evidence that supports the draft Regional Plan (which in turn has influenced the WRMP), in particular the “Population and Property Forecasts” document prepared by Vicus/Edge Analytics. Whilst it is recognised that it is difficult to predict future population and water consumption habits with certainty, this document provides a good starting point. It provides the supporting evidence for the High/Medium/Low population growth scenarios set out in the draft Plan.

However, it is unclear as to what extent Local Plan housing growth forecasts have been accounted for. Whilst there are scenarios related to “Housing Need” set out, for Mid Sussex this was based on March 2020 data. The forecasting for the emerging plan does not therefore specifically account for the locations and quantum of housing and employment development set out in the adopted Site Allocations DPD (June 2022) or increased housing need identified by the Standard Method.

Whilst population and household projections are a valid starting point for such forecasts, the Standard Method also applies an ‘affordability uplift’ which increases housing need further. For Mid Sussex, this increases the housing need identified by ONS Household Projections by over 50% and provides the starting point for Local Plans to plan for. This re-emphasises the fact that Local Plan housing figures are likely to be a better representation of future growth (both quantum and location) and should therefore be considered alongside projections. The forecasts should also account for planned employment growth in Local Plans given water consumption by certain industries is likely to be high.

The Council welcomes South East Water’s past engagement with the Local Plan process and encourages ongoing future engagement to ensure that housing and employment growth can be supported by the necessary infrastructure.

Delivering Longer-Term Environmental Improvements

Mid Sussex District is adjacent to the local authorities currently affected by the water neutrality issue in relation to designated nature conservation sites in the Arun Valley. Whilst not directly affected to the same degree, the Council is engaged with its neighbours to identify a water neutrality strategy and supports the approach to reduce the impact of growth on the environment. The Council therefore supports the Regional Plan’s ambitions for environmental improvements, for example by reducing reliance on abstraction.

Reducing Household Water Use

The Council recognises the water-stressed nature of the South East. It is also cognisant of environmental issues related to water abstraction, particularly the Water Neutrality position affected the Sussex North Water Resource Zone (Southern Water) and the impacts of climate change.

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To this end, the draft District Plan sets out the Council's ambitions for achieving tight standards for water efficiency in new developments – at least Home Quality Mark 3 Star for residential development and BREEAM Excellent for non-residential development. The draft policies require developers to demonstrate opportunities have been taken to reduce water use through use of efficient fittings and appliances, rainwater harvesting, greywater recycling and Sustainable Drainage Systems.

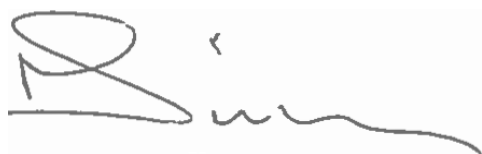
For sites over 1,000 dwellings, 85 litres/person/day will be expected. This is consistent with the standards being sought by authorities in the Sussex North Water Resource Zone as part of the strategy to achieve water neutrality. The Council notes South East Water's response to the draft District Plan consultation and their full support for policies related to reducing water consumption and recommendation for the Council to seek to be even more ambitious once regulation permits.

However, this relates only to new development. It will be vital for the water companies to play their part in encouraging and incentivising reductions in water consumption and achieving efficiencies in existing properties and businesses. The Council recognises the Government's national target to reduce household consumption to 110 litres/person/day by 2050 however given the water-stressed nature of the south east, it is disappointing that the draft Regional Plan predicts only 112 litres per person per day is likely to be achieved and could be more ambitious.

To improve this position and help increase resilience to the effects of climate change, the Council strongly feels that the water companies have a vital role to play in requiring developers to implement higher water efficiency standards and to lobby the Government to tighten Building Regulations sooner than anticipated. Due to the local water neutrality issue and the availability of water resources in general, including the security of future water supply, these interventions are needed now.

Mid Sussex District Council looks forward to engaging with South East Water as the Water Resources Management Plan progresses towards adoption and ongoing input from South East Water to the Council's draft District Plan.

Yours faithfully



Councillor Robert Salisbury
Cabinet Member for Planning

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